



Manchester Geological Association

DATA PROTECTION POLICY

1) Policy scope

This policy outlines how the Manchester Geological Association (the MGA) uses, manages, secures and protects members' data. This policy applies to the work of the MGA. The policy sets out the requirements that the MGA has to collect and process information for membership purposes. The policy details how personal information is collected, stored and managed i

n line with data protection principles and regulations. The policy is reviewed on an ongoing basis by the MGA committee members to ensure that the MGA remains compliant. This policy should be read in tandem with the MGA's Privacy Policy.

2) Why this policy exists

This data protection policy ensures the MGA:

- a. Complies with data protection law and follows good practice
- b. Protects the rights of members
- c. Is open about how it stores and processes members' data
- d. Protects itself from the risks of a data breach

3) General guidelines for committee members

- a. The only people able to access data covered by this policy should be those who need to communicate with or provide a service to the MGA members. The committee will agree who has access to personal data. This will be reviewed regularly.
- b. Committee Members should keep all data secure, by taking sensible precautions and following the guidelines below.
 - i. Strong passwords must be used, and they should never be shared.
 - ii. Data should not be shared outside of the MGA unless with prior consent and for specific and agreed reasons.
 - iii. Member information should be refreshed periodically to ensure accuracy, via the membership renewal process or when policy is changed.

4) Data protection principles

The General Data Protection Regulation identifies key data protection principles which the MGA adhere to.

a) Lawful, fair and transparent data processing

- a. The MGA requests personal information from potential members and members for membership applications and for sending communications regarding members' involvement with the MGA. Members are to be informed as to how the information will be used. The lawful basis for obtaining member information is due to the legitimate interest relationship that the MGA has with individual members.
- b. In addition, members will be asked to provide consent verbally for specific processing purposes such as taking photographs. The MGA members will be informed as to who they need to contact should they wish for their data not to be used for specific purposes for which they have provided consent. Where these requests are received, they will be acted upon promptly and the member will be informed as to when the action has been taken.

b) Processed for specified, explicit and legitimate purposes

Members will be informed as to how their information will be used and the committee of the MGA will seek to ensure that member information is not used inappropriately. Appropriate use of



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information provided by members will include:

- a. Communicating with members about the MGA events and activities
- b. Sending members information about MGA and other earth science events and activities judged by the committee to be relevant to the MGA
- c. Communicating with members about their membership and/or renewal of their membership
- d. Communicating with members about specific issues that may have arisen during the course of their membership

The MGA will ensure that members' information is managed in such a way as not to infringe individual members' rights which include:

- a. The right to be informed
- b. The right of access
- c. The right to rectification
- d. The right to erasure
- e. The right to restrict processing
- f. The right to data portability
- g. The right to object

c) Adequate, Relevant and Limited Data Processing

Members of the MGA will normally only be asked to provide information that is relevant for membership purposes. This will include:

- a. Name
- b. Postal address
- c. Email address
- d. Telephone number
- e. Gift Aid entitlement

Where additional information may be required this will be obtained with the consent of the member who will be informed as to why this information is required and the purpose for which it will be used.

Where the MGA organises a trip or activity that requires next of kin information to be provided, a legitimate interest assessment will have been completed in order to request this information. Members will be made aware that the assessment has been completed.

d) Photographs

Photographs are classified as personal data. Where group photographs are being taken members will be asked to step out of shot if they do not wish to be in the photograph. Otherwise, consent will be obtained from members in order for photographs to be taken and members will be informed as to where photographs will be displayed. Should a member wish at any time to remove their consent and to have their photograph removed then they should contact the MGA to advise that they no longer wish their photograph to be displayed.

e) Accuracy of data and keeping data up to date

The MGA has a responsibility to ensure members' information is kept up to date. Members will be informed to let the membership secretary know if any of their personal information changes. In addition, on an annual basis, the membership renewal process will provide an opportunity for members to inform the MGA as to any changes in their personal information.

f) Accountability and governance

The MGA committee are responsible for ensuring that the MGA remains compliant with data



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protection requirements and can evidence this. Where consent is required for specific purposes then evidence of this consent (either electronic or paper) will be obtained and retained securely. The MGA committee will ensure that new members joining the committee receive an induction into the requirements of GDPR and the implications for their role.

Committee Members will stay up to date with guidance and practice and will seek advice should any uncertainties arise. The MGA committee will review data protection requirements on an ongoing basis as well as reviewing who has access to data and how data is stored and deleted. When Committee Members relinquish their roles, they will be asked to either pass on data to those who need it and/or delete data.

g) Secure Processing

Committee Members have a responsibility to ensure that data is both securely held and processed. This will include:

- a. Committee members using strong passwords
- b. Committee members not sharing passwords
- c. Restricting access of sharing member information to those on the committee who need to communicate with members on a regular basis
- d. Using password protection on laptops and PCs that contain personal information
- e. Using password protection, a membership database or secure cloud systems when sharing data between committee members

h) Subject Access Request

MGA members are entitled to request access to the information that is held by the MGA. The request needs to be received in the form of a written request to the Membership Secretary of the MGA.

On receipt of the request, it will be formally acknowledged and dealt with expediently (the legislation requires that information should generally be provided within one month) unless there are exceptional circumstances as to why the request cannot be granted. The MGA will provide a written response detailing all information held on the member. A record shall be kept of the date of the request and the date of the response.

i) Data Breach Notification

Were a data breach to occur, action will be taken to minimise the harm. This will include ensuring that all the MGA committee members are made aware that a breach has taken place and how the breach occurred. The Committee shall then seek to rectify the cause of the breach as soon as possible to prevent any further breaches.

Where a MGA member feels that there has been a breach by the MGA, a committee member will ask the member to provide an outline of the breach, preferably confirmed in writing. The alleged breach will then be investigated by members of the committee, records will be kept and all those involved notified of the outcome.

The committee will agree what reporting is required to the Information Commissioners Office.

The MGA Data Protection Policy		
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