



Elstree & Borehamwood Resident's Association - Data Protection Policy

1. The EBRA Data Protection Policy is based on the new requirements of the General Data Protection Regulations (GDPR) which are effective from 25 May 2018. Under the GDPR, the data protection principles sets out the main responsibilities for organisations, both large and small. If personal data of any kind is held by an organisation, an audit trail and controls of how that data is being used must be detailed. Consent for holding that data is required from every member of the organisation.

2. Many of the GDPR's main concepts and principles are much the same as those in the current Data Protection Act (DPA), so if we are complying properly with the current law then most of our approach to compliance will remain valid under the GDPR and can be the starting point to build from. However, there are new elements and significant enhancements, so we will have to do some things for the first time and some things differently.

3. The GDPR states that organisations must determine the lawful basis for holding personal data and that basis needs to be determined, before processing begins. The reason should be documented and should state why personal data is required and the purposes of the processing and the types of processing activity, and the consequence of not holding personal data.

4. Our lawful basis for holding membership data is 'so we can inform members by newsletter and email'. There is no other way we can carryout these activities without holding personal data. This forms our lawful basis for holding membership data under the GDPR and inline with UK and EU law.

5. The EBRA Data Protection Officer (DPO) will be responsible for holding, maintaining membership data, and obtaining consent from each member of the Resident's Association. The only the EBRA Chairman and Membership Secretary will be able to access membership. Membership is never given out to third parties.

6. All members of the EBRA will need to contact the Membership Secretary regarding the withdrawal of their consent for data held on them at anytime.

7. If a member resigns, relapses or dies all data concerning that member must be destroyed within a reasonable period of time.

8. The data that the EBRA will hold on members is as follows:

- a) Name
- b) Address
- c) Telephone number (which may be a landline or mobile number)
- d) Email Address

9. Committee members may also give consent to having a photograph published in newsletters or on the Elstree & Borehamwood Resident's Association website.

10. When a member receives a consent form they must also be provided with information as to how they can withdraw their consent at anytime.

11. It is recommended that landline numbers should not be used by committee members as it can sometimes be difficult to block unwanted calls. It is recommended that mobile phone numbers are used where possible on websites and in newsletters as they can easily be blocked, which can help protect committee members from antisocial or unwanted phone calls. It is also recommended that corporate email addresses are used in publications and on websites and personal addresses must not feature on websites or in Newsletters. This is also to help protect individual personal data.

12. The GDPR sets a high standard for individual consent. Consent means offering individuals real choice and control. Genuine consent should put individuals in charge, build membership trust and engagement, and enhance the reputation of EBRA. Consent requires a positive opt-in. The GDPR states that pre-ticked boxes or any other method of default consent must not be used.