

Wortham and Burgate Twinning

General Data Protection Regulation compliance

1 Awareness

All Committee Members were made aware of the GDPR on 16th April 2018 both verbally in the Committee meeting and by the ICO's "12 steps" document being previously made available by email. The lawful basis for processing data is agreed to be "Legitimate Interest" which means that the individual members of the TWINNING ASSOCIATION would not have to formally agree to their data being held by the Association.

The Committee as a whole takes responsibility for Data Protection and the designated point of contact is the Secretary.

2 Information we hold

THE TWINNING ASSOCIATION holds personal data for its Committee Members and members. It does not have a conventional office.

Committee Members – the information held about Committee Members is the same as that held for Members. Those details are held electronically by the Secretary and Treasurer and only shared between Committee Members. Those details are not shared with other people and organisations unless consented to by the Committee Member or for operating the bank accounts.

Members – Members give the basic information necessary to communicate with them, name, address, phone and email. Children's data is limited to just their name age and parent's data. Forms are kept on paper and electronically by the membership manager. Data is destroyed 3 years after the member last paid the membership fee or when they indicate they no longer wish to receive newsletters and information about events – whichever is the later.

No information on members is given to or shared with any other organisation without that member's consent other than for reasons deemed to be in our Legitimate Interest.

3 Communicating privacy information

All forms of communication, whether electronic or paper which require personal data shall contain the following wording:

The lawful basis for the TWINNING ASSOCIATION holding data under General Data Protection Regulations is Legitimate Interest and if you wish to see the TWINNING ASSOCIATION Privacy Policy please contact the TWINNING ASSOCIATION Secretary [Judith Phillip; Telephone: 01379 741806].

A copy of the policy is also available on the Twinning website:

(><http://www.worthamandburgatetwinning.onesuffolk.net/><)

4 Individuals' rights

Data can be obtained by the individual concerned from the TWINNING ASSOCIATION Secretary by photocopy, computer printout or as in "Word", "Excel", or "PDF".

The GDPR includes the following rights for individuals:

The right to:

- be informed
- access

- rectification
- erasure
- restrict processing
- data portability
- object
- not to be subjected to automated messaging

5 Subject access requests

There will be no charge for complying with a request and the reply will be given within one month.

6 Lawful basis for processing personal data

The lawful basis for THE TWINNING ASSOCIATION processing personal data is Legitimate Interest.

7 Consent

Consent is not required as the lawful basis is Legitimate Interest.

8 Children

Children's data is limited to just their names, ages and parents' data.

9 Data breaches

Having a procedure to detect personal data breaches is not practical for such a small organisation with small data bases. A breach would be most likely to be detected by a complaint.

A breach would be investigated by a group of the Chair, Treasurer, and Secretary and notified to the individual(s) concerned and to the ICO if it were likely to result in a high risk to the rights and freedoms of individuals – if, for example, it could result in discrimination, damage to reputation, financial loss, loss of confidentiality or any other significant economic or social disadvantage.

10 Data Protection by Design and Data Protection Impact Assessments

Personal data systems will be designed to protect privacy appropriate to the risk and size of any possible data protection breach.

The TWINNING ASSOCIATION is a low risk for significant data protection breaches. A formal Data Protection Impact Assessment is not required as the TWINNING ASSOCIATION

- Is not deploying a new technology
- Does not use profiling
- There is no processing of the special categories of data

11 Data Protection Officer

The TWINNING ASSOCIATION Committee takes responsibility for data protection and the contact is the Secretary.

The TWINNING ASSOCIATION as a not for profit small organisation is not required to formally designate a Data Protection Officer.

12 International

The TWINNING ASSOCIATION does not operate in more than one EU member state.