

# Data Protection Policy

## 1 What personal data does WCC collect?

The data we normally collect includes names, addresses, telephone numbers and email addresses. In addition, we also collect date joined, merit class, distinctions, photographic interests by category, committee membership, special interest group membership and camera equipment. We collect this data directly from individuals, and it is stored in the club membership system.

We also collect the images, scores and awards from WCC competitions / exhibitions which may include personal data. This data is collected and published in the club's competition system (PhotoEntry), and published in emails and on our website outlining the results and unless the individual has opted out when considering an image for External competitions.

We also collect information about attendance of events, so the Club can improve its offering to its members.

We collect personal data on judges and speakers, including name, email address, telephone number and limited biographical data.

## 2 What is our data protection policy?

WCC complies with the principles of data protection enumerated in the General Data Protection Regulation (GDPR). We will make every effort possible in everything we do to comply with these principles. The principles are:

### 2.1 Lawful, fair and transparent

Data collection must be fair, for a legal purpose and we must be open and transparent about how the data will be used.

### 2.2 Limited for its purpose

Data can only be collected for a specific purpose.

### 2.3 Data minimisation

Any data collected must be necessary and not excessive for its purpose.

### 2.4 Accurate

The data we hold must be accurate and kept up to date.

### 2.5 Retention

We will not store data longer than necessary.

### 2.6 Integrity and confidentiality

The data we hold must be kept safe and secure.

### **3 What is this personal data used for?**

We use data on members for the administration of club membership; the communication of information, including both WCC matters and third party events and developments deemed to be of interest to members; and the organisation of events.

We use data on judges and speakers for the administration of our programme and to advertise some events to other camera clubs.

### **4 Who is your data shared with?**

Your personal data is not passed on to external organisations, with the following exceptions:

- Data on some of the WCC committee members (Chair, Secretary and Treasurer) is published on the Southern Counties Photographic Society's website.
- Email addresses of members are held on our Club's email system (Groups.IO). This allows communication to all members, without disclosing each member's email address on the accompanying email.
- The email address of each of our members is passed to PhotoEntry for administration of our online Competition solution.
- The names of judges and speakers are published on our website, and for Speakers their websites, Facebook pages and Instagram accounts are also shown within our Programme section of the website.

No data is shared with anyone outside the UK.

### **5 Where does this data come from?**

Data comes from club members: when they complete the membership form annually; and when club members take on duties and responsibilities requiring other members to know either as a Committee Member or volunteer.

Data comes from Judges and Speakers: when they agree to judge one of our competitions or to deliver a talk.

### **6 How is your data stored?**

This information is mainly stored in digital form on private computers. Some paper records exist temporarily (e.g. the Door list), but then recorded digitally and the paper destroyed.

Data relating to members, as outlined in Section 1, is stored in the following web applications:

Web Application	Purpose	Privacy Policy
Groups IO	Emails and circulars to all members of WCC	<a href="https://groups.io/static/compliance">https://groups.io/static/compliance</a>
Photoentry	Submission of entries and recording of marks for WCC Internal competitions.	<a href="https://photoentry.uk/information/privacy.html">https://photoentry.uk/information/privacy.html</a>
Google Drive	Storage of minutes, spreadsheets, etc.	<a href="https://cloud.google.com/privacy/gdpr">https://cloud.google.com/privacy/gdpr</a>

### **7 Who is responsible for ensuring compliance with the relevant laws and regulations?**

Under the GDPR (General Data Protection Regulation) we do not have a statutory requirement to have a Data Protection Officer. If you have a GDPR question, please contact one of the Committee Members (by the usual means) or via our contact page ([click here](#)).

### **8 Who has access to your data?**

Members of the Committee have access to data in order for them to carry out their legitimate tasks on behalf of the Club, for example contacting members and steering the programme offered to members. They are not permitted to use it for any other purpose.

### **9 What is the legal basis for collecting this data?**

WCC collects personal data that is necessary for the purposes of its legitimate interests as a membership organisation and participant in locally and nationally recognised exhibitions/awards/competitions. At least one of the following two conditions must apply whenever we process personal data:

#### **A Consent**

We hold recent, clear, explicit, and defined consent for the individual's data to be processed for a specific purpose. We must also ensure that individuals whose data is being processed by us are informed of the basis for processing their data, as well as the intended purpose. We do this by making this policy known when we seek consent.

#### **B Legitimate Interest**

The processing is necessary for our legitimate interests.

#### **10 How you can check what data we have about you?**

If you want to see the data we hold about you, you may contact any Committee Member. If you are interested in any particular aspects, specifying them will help us to provide you with what you need quickly and efficiently. We will provide this to you within one month. There is not usually a fee for this, though we can charge a reasonable fee based on the administrative cost of providing the information if a request is manifestly unfounded or excessive, or for requests for further copies of the same information.

#### **11 Does WCC collect any “special” data?**

The GDPR refers to sensitive personal data as “special categories of personal data”. We do not record any such special data with the sole exceptions of:

- data received from club members on emails regarding judge and presenter performance at WCC organised competitions or talks
- data which may relate to the disabilities and special needs of individuals who have explicitly requested it to be recorded for the purpose of assisting them

#### **12 How can you ask for data to be removed, limited or corrected?**

Contact any Committee Member.

#### **13 How long do we keep your data for and why?**

We normally keep member data for two years after a member leaves WCC in case they later wish to re-join. However, we will delete any details entirely on request.

Since underlying statistical data, such as information from competitions/exhibitions continues to be necessary in relation to the purpose for which it was originally collected and processed, results from these events are not deleted. Historical lists and award lists are required for archiving purposes and names cannot be removed from them.

Other data, such as that relating to accounting or personnel matters, is kept for the legally required period.

#### **14 What happens if a data subject dies?**

We do not normally keep information after someone dies with the exception of historical data outlined in 13 above.

#### **15 What about WCC and Social Media websites (e.g. Facebook, Instagram and Flickr)?**

WCC has a presence on the following social media sites: Facebook, Instagram and Flickr. All members are free to join these pages. If you join one of these Social Media sites, please note that providers of the social media platforms have their own privacy policies and that the club does not accept any responsibility or liability for these policies or the use of your personal data on them. Please check these policies before you join any social media platforms, which is required before you subscribe or follow the WCC presence on them.