

Surrey Heath Choral Society



SHCS & GDPR

Introduction

This document sets out the initial steps Surrey Heath Choral Society is taking to ensure the society complies with General Data Protection Regulation (GDPR). We expect this document to be updated as our GDPR procedures are applied in practice.

Data Audit

The GDPR requires all businesses, including charitable organisations to demonstrate they are processing data legally and protecting the rights of individuals regarding the personal data held.

Understanding what data SHCS holds and uses across its activities will help our Society comply with the new regulations. For this reason, a data audit is currently being carried out internally. This includes:

1. Identifying all the personal and sensitive data the society holds.
2. Documenting where the data is stored, how the data is used and with whom the data is shared.
3. Establishing from where the data came from and identifying the legal basis for holding and processing it. Any processing of the data will only be performed if it is necessary to carry out the Society's official functions, and that the task or function has a clear basis in law.
4. Determining whether the data has been held with the consent of the individual whose data it concerns, and considering whether we need to continue to hold that data.
5. When Members leave they cease to be a member of the Society we will ensure that their personal data is deleted from existing lists and registers.

Security Review

We are also reviewing relevant security measures to ensure systems are robust and personal data is safeguarded. This will help the Society identify any potential risks of non-compliance or any weaknesses in our data storage and handling systems.

Protecting against Cyber Attacks

To ensure that the individual computers that hold circulation lists and personal data are protected against cyber attacks, we will ensure the computer systems

that hold personal information utilise security software and that they are kept up-to-date.

Data Encryption

As a minimum, SHCS expects that any personal data sent electronically will be by encrypted attachment.

Data Protection Officer

SHCS does not require to have a Data Protection Officer (DPO). However, we have appointed a Trustee to have responsibility for Data Protection within the Society.

Reporting a Data Breach

We will have clear policies in place for reporting a data breach including where applicable, notification of the ICO (Information Commissioners Office). Any data breach will be reported to the DPO (Trustee with DP responsibility) immediately. If we do not report it to the ICO, SHCS will justify this decision and document it.

Legal Basis for Processing Data

Personal Data is anything that can identify or be associated with an individual. This includes name, address, email address, telephone number. We therefore are in the process of ensuring the legal basis is there for processing such data, and documenting it as part of the above Audit.

Data Subject Rights

We will ensure that procedures are in place to deal with individual's enhanced rights under GDPR, such as the right to data portability and the right to erasure.

Prepared by Colin Gunner (Trustee responsible for Data Protection)

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