

**DEDHAM HORTICULTURAL  
SOCIETY  
(THE DHS)**

**DATA PROTECTION POLICY**

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## VERSION CONTROL

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1 - Issued	General	30 June 2006
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3Draft - GDPR	Committee	March 2018
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## **1 Introduction**

This document sets out how the DEDHAM HORTICULTURAL SOCIETY (hereafter referred to as DHS) adheres to the requirements of the General Data Protection Regulation. It explains the requirements of the Regulation, the steps the DHS as an organisation has taken to comply with the Regulation, and the actions that DHS Officials and users of DHS data must take to ensure compliance with the Regulation.

## **2 The General Data Protection Regulation**

The General Data Protection Regulation in force from 25 May 2018, sets out rules for processing personal information and applies to some paper records as well as those held on computers. Whilst the Regulation is limited to “personal information”, that is, information held about identifiable living individuals, the DHS applies the requirements of the Regulation to all information it holds.

## **3 Background**

### **3.1 Why does the DHS collect and hold Data?**

In order to offer Society facilities to its members, the DHS needs to hold personal information about members. The DHS records, as a condition of membership, details of members Names, Addresses, telephone numbers, email addresses and membership status. This information is used solely for the purpose of managing the Society and is not passed to any other organisation or person unless in relation to Society business. Data is held both on computer-based records and paper records.

### **3.2 The Data Subject**

This is the term used in the Regulation to define the individual who is the subject of personal data. For the DHS this means members of the Society.

### **3.3 Data Processing**

The Regulation sets out rules for the “processing” of data. Processing is defined as “obtaining, recording or holding information or data or carrying out any operation or set of operations on the information or data”.

This definition therefore encompasses all of the DHS’s operations. Processing of DHS data might be carried out by companies operating on the DHS’s behalf (such as printers). This Policy therefore applies to these bodies as well as to the DHS itself.

### **3.4 Data Controller**

The Data Controller is a role defined in the Regulation. The Data Controller is responsible for Notification under the Regulation, ensuring compliance with the Regulation, documentation relating to the Regulation, and responding to individual requests for information or complaints.

For the DHS, the Data Controller is the Secretary of the Society. Contact details for the current Secretary are published on the Society’s Membership Cards.

## **4 Provisions of the General Data Protection Regulation.**

### **4.1 General provisions**

**Responsibility:** The DHS Data Controller is the Secretary of the Society. Contact details for the current Secretary are published on the Society’s Membership Cards.

**Review:** This policy is reviewed annually prior to the Society's Annual General Meeting.

**Data definition:** The DHS records details of members Names, Addresses, telephone numbers, email addresses and membership status. These data are required for the Society to retain contact with members and is a condition of membership.

**Breach reporting:** Any member believing that a breach of the regulations has taken place may contact the Society's Data Controller directly or via any of Society's Officials when a full investigation will be carried out.

#### **4.2 Lawful, fair and transparent processing**

**Data audit:** The DHS records details of members Names, Addresses, telephone numbers, email addresses and membership status. These data are reviewed annually on renewal of individual membership.

**Disclosure:** Any member wishing to see what data is held by the DHS may contact the Data Controller directly or via any of the Society's Officials.

#### **4.3 Purpose limitations**

The DHS records details of members Names, Addresses, telephone numbers, email addresses and membership status. This information is used solely for the purpose of managing the Society and is not passed to any other organisation or person unless in relation to Society business. The information is collected from persons when applying for membership (Appendix B); and is a condition of membership.

#### **4.4 Data minimisation**

The DHS only records details of members Names, Addresses, telephone numbers, email addresses and membership status. No 'sensitive personal data' is held by the DHS. (Sensitive data includes racial or ethnic origin, political opinions, religious or other beliefs, trade union membership, physical or mental health or condition, sexual life, and records of offences.)

#### **4.5 Accuracy**

The DHS has procedures in place to verify certain information (such as address), but Officials must make sure that information they record is both accurate and relates to the correct data subject. Errors must be corrected immediately. The accuracy of data is achieved by checking with data subjects on annual renewal of membership.

#### **4.6 Storage limitations**

The DHS currently has no historic information that it is not appropriate to retain. On cessation of membership, all data is removed.

#### **4.7 Integrity and confidentiality**

Data held by the DHS is only available to the Elected Officials. All Officials are personally responsible for the security of any data made available to them.

Data held by the DHS may only be used for the purposes for which it has been collected and stored.

Users of the DHS data must **not** release any data to a third party in any circumstances.

If a mailing list of the DHS members is to be provided to a third party for any reason whatsoever, the prior express permission of the Data Controller must be obtained.

Any arrangements with third parties must include the explicit agreement of the third party to:

- abide by the requirements of the General Data Protection Regulation and this Policy;
- use the data only for the purpose for which it was provided, and
- either return or destroy the data immediately after the approved use.

DHS data must **not** be published in any manner whatsoever.

Users must be aware of inadvertent disclosure of data to third parties.

Individual computer systems are also backed up as required.

## 5 The Data Protection Principles

Under the GDPR, the data protection principles set out the main responsibilities for organisations.

### 5.1 Article 5 of the GDPR requires that personal data shall be:

*a) processed lawfully, fairly and in a transparent manner in relation to individuals;*  
The DHS records details of members Names, Addresses, telephone numbers, email addresses and membership status. These data are reviewed annually on renewal of individual membership. Any member wishing to see what data is held by the DHS may contact the Data Controller directly or via any of the Society's Officials.

*b) collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes; further processing for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes shall not be considered to be incompatible with the initial purposes;*

All data collected by the DHS is used solely for the purpose of managing the Society and is not passed to any other organisation or person unless in relation to Society business. Data is used for contacting individuals and sharing marketing information about events and activities which the Society's Committee believe will be of interest to its members.

*c) adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed;*

The DHS records details of members Names, Addresses, telephone numbers, email addresses and membership status. No 'sensitive personal data' is held by the DHS. (Sensitive data includes racial or ethnic origin, political opinions, religious or other beliefs, trade union membership, physical or mental health or condition, sexual life, and records of offences.)

*d) accurate and, where necessary, kept up to date; every reasonable step must be taken to ensure that personal data that are inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay;*

The DHS has procedures in place to verify certain information (such as address), but Officials must make sure that information they record is both accurate and relates to the correct data subject. Errors must be corrected immediately. The accuracy of data is achieved by checking with data subjects on annual renewal of membership.

*e) kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed; personal data may be stored for longer periods insofar as the personal data will be processed solely for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes subject to implementation of the appropriate technical and organisational measures required by the GDPR in order to safeguard the rights and freedoms of individuals;*

The DHS currently has no historic information that it is not appropriate to retain. On cessation of membership, all data is removed.

**5.2 Article 5(2) requires that: “the controller shall be responsible for, and be able to demonstrate, compliance with the principles.”**

For the DHS, the Data Controller is the Secretary of the Society. Contact details for the current Secretary are published on the Society's Membership Cards.

**5.3 The GDPR provides the following rights for individuals:**

*1. The right to be informed*

- The DHS membership application form contains the wording at Appendix B.

*2. The right of access*

- Any member wishing to see what data is held by the DHS may contact the Data Controller directly or via any of the Society's Officials.

*3. The right to rectification*

- Any member wishing to see what data is held by the DHS may contact the Data Controller directly or via any of the Society's Officials. Corrections will be made as soon as practicable.

*4. The right to erasure*

- The DHS records details of members Names, Addresses, telephone numbers, email addresses and membership status. These data are required for the Society to retain contact with members and is a condition of membership. Any individual wishing that their data is erased will be required to cease their membership.

*5. The right to restrict processing*

- All data collected by the DHS is used solely for the purpose of managing the Society and is not passed to any other organisation or person unless in relation to Society business. Data is used for contacting individuals and sharing marketing information about events and activities which the Society's Committee believe will be of interest to its members. If an individual wishes to restrict the use of their data, they will not be contactable by the Society.

*6. The right to data portability*

- The DHS will provide a printed copy of data held to any individual wishing to port their data to another organisation.

*7. The right to object*

- Data is used for contacting individuals and is not used or processed for any other purpose such as marketing. The right to object is upheld by the DHS in relation to the terms of membership.

*8. Rights in relation to automated decision making and profiling*

- The DHS does not employ automated decision making and profiling

## **Appendix A – The DHS Data Protection Statement**

The General Data Protection Regulation (May 2018) defines your rights as an individual in relation to the information held about you and how it may be used.

Like any membership organisation, the DHS holds information about its members, including names and addresses, your membership details, and payment of your subscription. The provision of this information is therefore a condition of membership.

The most important way in which the Society uses data is providing you with information about the activities of the Society and the membership benefits available to you as a member of the DHS. The DHS does not, as a matter of general policy, pass on information about you to third parties

It is absolutely essential that you should trust the DHS to act responsibly and in your interests. The DHS fully accepts this responsibility and is happy to give you a firm undertaking that the Society will keep information about you up to date and accurate and do everything it can to prevent it from being used in any unauthorised or illegal way.

In addition to the Society's commitment, the Data Protection Regulation gives you more extensive rights in relation to the information held about you. If you prefer that the Society stops using your information for the purpose of advising you about the DHS activities, or if you feel that we are using information about you in any way that which you believe may cause you (or another person) substantial damage or distress, you should contact the Society Secretary (details are on your membership card) to request that your records are no longer used in this way.

If you would like to see a copy of the information we hold about you, please contact the Secretary.

## **Appendix B – Application Form, etc. Text**

The DHS will use the information you have provided here for the purpose of providing you with information about the DHS activities and membership benefits available to you as a member of the DHS. The provision of this information is a condition of membership.

The DHS will not disclose this information to any other person or organisation except in connection with the above purposes.

I agree to the above use of my data.

Signed: