

# **Société Franco-Britannique**

## **GDPR (General Data Protection Requirement) Policy V1.2 August 2018**

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### **General principles**

- 1 SFB requires the consent of the individual to store personal data.
- 2 The GDPR requires that the SFB process personal data in a manner that is transparent to individuals, ie that they know what use we make of their personal data.
- 3 The information the SFB holds must be limited to that which is necessary.
- 4 SFB must take reasonable steps to ensure the data is accurate, and correct it when necessary.
- 5 SFB must ensure the safety of this data, and delete it when no longer required.
- 6 It follows that SFB needs to know what data it holds, why it holds them, where it holds them, how it keeps them secure, and to have a policy on deletion.
- 7 SFB also needs to be able to tell individuals, on request, what data it holds on them, and to delete this data, on request, if it no longer need it.

### **Individual Consent**

- 1 SFB holds personal data on:  
members who supply names and contact data;  
attendees at meetings who supply their name and contact details;  
others who make enquiries by email or otherwise and provide their details;  
speakers who also supply some contact details;  
people who wish to participate in events organised by the SFB;

others who we may need to contact about room hire, to arrange facilities for meetings, or to publicise our meetings.

2 SFB will put this policy document, with an accompanying notice, on the SFB website to make it clear that anyone contacting us gives consent for us to store the personal data supplied for use in managing their query; to make it clear that if someone supplies us with personal data on anybody else – for example alternative contacts for the enquiry, or someone else who might be interested in SFB events - the person supplying the information must have permission to do so.

SFB will amend the membership form and the signing-in book to make it clear that anyone supplying personal details gives us permission to use them within the terms of this policy.

3 SFB will contact all persons on the official email accounts to draw attention to this policy document and to offer to remove any email accounts which the person concerned no longer wishes SFB to store.

### **What SFB Uses the Data For**

1 SFB uses the data to communicate with the individual regarding the running of the SFB. SFB may also use the contact details to inform them of any events relating to the French language or culture which may be of interest to members.

SFB does not contact individuals for any other reason. SFB does not share contact details with third parties. The only personal data shared with third parties is that required for the running of SFB trips and events and that required by the Inland Revenue for the running of the Gift Aid scheme.

### **Limited Data**

1 SFB holds only what we need to manage our communications and activities or to deal with an enquiry.

### **What Data SFB Holds**

1 SFB holds the data supplied by members, guests at SFB meetings, or anyone else who contacts SFB. This will typically include name and email address, and may also include other contact details such as postal address and telephone number (landline and mobile).

2 For some organised events the SFB may need to hold additional details; for example if SFB organises a trip abroad it may need to hold DOB, nationality, passport details, insurance details, medical details and next-of-kin and emergency contact details.

In this case the data will be held by the event organiser and these additional details will be retained only as long as necessary, and will be deleted after the trip when any issues have been resolved satisfactorily.

3. SFB claims money each year from the Inland Revenue under the Gift Aid scheme. This requires the SFB to provide personal data to the Inland Revenue comprising name, address, and date of signature of Gift Aid declaration.

### **Why SFB holds Data**

1 SFB needs the personal data to let it communicate with individuals who wish to be informed of SFB activities, or whom it needs to communicate with to arrange or publicise its activities.

2 SFB may need extra data on individuals who participate on holidays or other trips organised by the SFB to ensure the smooth running of the event.

### **Where does the SFB hold Personal Data?**

1 The principal store of personal data is on the computers and email accounts of the Secretary and Treasurer.

2 Whole or partial copies of this data may be made available to other committee members to assist in the smooth running of the SFB.

4 When SFB needs to hold additional data for participants at a particular event, this data will be held securely by the event organiser either on a personal compute with restricted access, on an email account with restricted access, or in hard-copy files under the personal control of the organiser or organisers.

### **Accuracy**

1 SFB will attempt to correct any errors which it spots. This will typically involve querying any items that look wrong, for example a telephone number or email address in the wrong format.

### **Data Security and Deletion**

1 Personal data is held by the Secretary on a personal computer with limited access and a password, and on an email account protected by a password, or in a paper filing system at a private residence.

2 The Treasurer may also hold personal data on a personal computer with limited access and a password, and on an email account protected by a password, or in a paper filing system at a private residence.

3 Other committee members (or event organisers) may also hold personal data on a personal computer with limited access, and on an email account protected by a password, or in a paper filing system at a private residence.

4 Personal data will be retained as long as the consent is valid. The Secretary, Treasurer and other committee members who hold personal data will review the data at least annually and delete information that is no longer relevant or where permission has expired.

5 The President of the SFB will seek an annual assurance from every committee member and event organiser that any personal data held has been reviewed and deleted according to this policy.

### **Other**

1 SFB is not required to have a Data Protection Officer (DPO). However, in order to provide a first point of contact for supervisory authorities or for individuals whose data is processed, the SFB will nominate a person to act as DPO. In the first instance this will be the President but the committee or the AGM may appoint someone else.

2 Subject Access Requests, or requests to amend or delete data, should be made to the Data Protection Officer.

3 The SFB should ask all committee members on a regular basis to state what personal data they hold (if any) and why they hold it.

4 Data breaches should be reported to the DPO. Possible breaches could be either the theft or loss of a computer or paper file holding the data, or a successful cyber attack on Google or other email service.

**End of Document**