

## **The Italy and Colonies Study Circle Data Protection Policy**

### **SCOPE OF THE POLICY**

This policy applies to the activities of the Italy and Colonies Study Circle (hereafter 'the ICSC'). The policy sets out the requirements that the ICSC has when requesting personal information for membership purposes. The policy details how personal information will be gathered, stored and managed in line with data protection principles and the General Data Protection Regulation.

### **WHY THIS POLICY EXISTS**

This data protection policy ensures that the ICSC:

1. Complies with data protection law and follows good practice.
2. Protects the rights of members.
3. Is open about how it stores and processes members' data.
4. Protects itself from the risks of a data breach.

### **GENERAL GUIDELINES FOR COMMITTEE MEMBERS AND GROUP ORGANISERS**

1. The only people able to access data covered by this policy should be those who need to communicate with or provide a service to the members of the ICSC.
2. Data must not be shared informally or outside of the ICSC.
3. The ICSC will provide information to committee members and group organisers to help them understand their responsibilities when handling personal data.
4. Committee Members and group organisers and anyone else who has access to members' data should keep all data secure, by taking sensible precautions and following the guidelines below.
5. Personal data should not be shared outside of the ICSC unless with prior consent and/or for specific and agreed reasons.
6. Member information should be reviewed and consent refreshed periodically.

### **DATA PROTECTION PRINCIPLES**

The General Data Protection Regulation identifies 8 data protection principles.

1. Personal data shall be processed lawfully, fairly and in a transparent manner.
2. Personal data can only be collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes.
3. The collection of personal data must be adequate, relevant and limited to what is necessary compared to the purpose(s) data is collected for.
4. Personal data held should be accurate and, where necessary, kept up to date. Every reasonable step must be taken to ensure that personal data that are inaccurate are erased or rectified without delay.
5. Personal data which is kept in a form which permits identification of individuals shall not be kept for longer than is necessary.
6. Personal data must be processed in accordance with the individuals' rights.
7. Personal data must be processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures.
8. Personal data cannot be transferred to a country or territory outside the European Union unless that country or territory ensures an adequate level of protection for the rights and freedoms of individuals in relation to the processing of personal data.

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

The ICSC requests personal information from potential members and members for the purpose of sending communications about their involvement with the ICSC. The forms used to request personal information will contain a privacy statement informing potential members and members as to why the information is being requested and what the information will be used for. Members will be asked to provide consent for their data to be held and a record of this consent along with member information will be securely held. ICSC members

will be informed that they can, at any time, remove their consent and will be informed as to who to contact should they wish to do so. Once an ICSC member requests not to receive certain communications this will be acted upon promptly and the member will be informed as to when the action has been taken. The use of email or phone to communicate with any member is dependent on having the necessary consent.

#### **Processed for Specified, Explicit and Legitimate Purposes**

Members will be informed as to how their information will be used and the Committee of the ICSC will seek to ensure that member information is not used inappropriately. Appropriate use of information provided by members will include:

1. Communicating with members about the ICSC's events and activities.
2. Group organisers communicating with their group members about specific group activities.
3. Adding members' details to the direct mailing list for the society journal and the society auction catalogue.
4. For members signed up to receive the printed editions of the journal and auction catalogue, sharing their names and mailing addresses with an external company employed by the ICSC to handle the actual mailing process. *(For members signed up to receive the digital versions of the journal and auction catalogue, distribution by email will be carried out by the ICSC).*
5. Communication with members of the Exchange Packet System, and with Vendors and Bidders in the society auctions.
6. Communicating with members about their membership and/or renewal of their membership.
7. Communicating with members about specific issues that may arise during the course of their membership.

The ICSC will not send marketing and/or promotional materials to members.

The ICSC will ensure that members' information is managed in such a way as to not infringe an individual members rights

#### **Adequate, Relevant and Limited Data Processing**

Members of the ICSC will only be asked to provide information that is relevant for membership purposes. This may include:

1. Name.
2. Postal address.
3. Email address.
4. Telephone number.

Where additional information may be required, this will be obtained with the specific consent of the member who will be informed as to why this information is required and the purpose for which it will be used for.

Where the ICSC organises a trip that requires next of kin information to be provided, the ICSC will advise the member that they must gain consent from the identified next of kin. The consent will provide permission for the information to be held for the purpose of supporting and safeguarding the member in question. Were this information is needed as a one off for a particular trip or event then the information will be deleted once that event or trip has taken place unless it was to be required (with agreement) for a longer purpose. The same would apply to individuals who may attend either a one-off event or on an ongoing basis to support an ICSC member with the agreement of the ICSC.

There may be occasional instances where a member's data needs to be shared with a third party due to an accident or incident involving statutory authorities. Where it is in the best interests of the member or the ICSC, in these instances where the ICSC has a substantiated concern, then consent does not have to be sought from the member.

#### **Accuracy of Data and Keeping Data up to Date**

The ICSC has a responsibility to ensure members' information is kept up to date. Members will be asked to let the membership secretary know if any of their personal information changes.