

# Privacy Policy

## GDPR: Data Protection Policy: Norfolk Group of Reflexologists (NGR)

**Document Created:** 28<sup>th</sup> February 2022

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Compiled for the NGR by Chris Hall, Treasurer for the NGR

### Policy Purpose

This policy outlines the NGR data protection policy, and thus how we comply with the GDPR.

**GDPR Registration** - We have registered an interest with the ICO.

### Policy Content

#### 1. The data that we process and how it flows into, through and out of the NGR.

Data comes into the NGR in 4 ways:

- a. Via email messages to NGR or Team (Committee) Members from potential members (PM) and members (M) that have my email address or the email address of a fellow team member.
- b. Via text messages (as above)
- c. Via Telephone messages
- d. Via Facebook Messenger

It flows through the Norfolk Group of Reflexologists:

- By laptop – used by team members
- By smart phone – carried by team members
- By paper file - which goes from home to group meeting

The information does not flow out of the NGR.

## **2. The personal data the NGR holds, where it came from, who it is shared with and what we do with it.**

Information Asset Register

- The NGR holds personal information about members that they have supplied to register for membership.
- This includes name, contact details, and, where appropriate address.
- The NGR does not share this information with anyone who is not a team member for the purposes of administering the Group.
- The NGR keeps all data for:
  - a. Contacting individuals to advise of future meetings and workshops etc
  - b. Maintaining membership records
  - c. Any other legitimate reason for contacting members, for which the NGR is required to retain information for 8 years.

## **3. The lawful bases for the NGR to process personal data and special categories of data.**

The NGR will process member's personal data under:

- **Legitimate interest:** The NGR is required to retain the information about members in order to provide them with the best possible information relating to the group and its activities.

## **4. Privacy Notice**

Individuals need to know that their data is collected, why it is processed and who it is shared with.

The NGR team is in the process of writing a privacy notice for members and potential members, and will ensure that the privacy notice includes all the information included in the ICO privacy notice checklist at: <https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/right-to-be-informed#table>

## **5. Processes to recognise and respond to individuals' requests to access their personal data.**

All individuals will need to submit a written request to access their personal data - either by email or by letter. The NGR team will provide that information without delay and at least within one calendar month of receipt. This period can be extended by a further two months for complex or numerous requests (in which case the individual will be informed and given an explanation).

The NGR team will keep a record of any requests to access personal data.

## **6. Processes to ensure that the personal data held remains accurate and up to date.**

The NGR team will ensure that member information is kept up to date during the term of membership and will update member information as and when we are informed of any changes.

Once a year the NGR will also have a wholesale review of all data.

## **7. Schedule to dispose of various categories of data, and its secure disposal.**

Once a year the NGR team will review member information and will place dormant members contact information in a separate file. This will be assessed each month to ensure that data that is no longer required to be kept under GDPR is destroyed securely.

## **8. Procedures to respond to an individual's request to restrict the processing of their personal data.**

As the NGR will only hold data in order to contact and advise members, we cannot envisage a situation where we would receive a request to restrict the processing of an individual's personal data. However, if the NGR team does receive a request we will respond as quickly as possible, and within one calendar month, explaining clearly what we currently do with their data and that we will continue to hold their data but will ensure that it is not processed.

## **9. Processes to allow individuals to move, copy or transfer their personal data from one IT environment to another in a safe and secure way, without hindrance to usability.**

Should clients wish their data to be copied or transferred the NGR team would work with the member to ensure that this is done in a way that was most appropriate for them - for example this could be an electronic summary of membership fees paid, with contact no and email address.

## **10. Procedures to handle an individual's objection to the processing of their personal data.**

The NGR team will inform members or potential members of their right to object "at the point of first communication" and will clearly lay this out in the NGR privacy notice.

## **11. Processing operations that constitute automated decision making.**

The NGR does not have any processing operations that constitute automated decision making and therefore, do not currently require procedures in place to deal with the requirements. This right is, however, included in the NGR privacy statement.

## **12. Data Protection Policy**

This document forms the NGR data protection policy and shows how the NGR complies with GDPR.

This is a live document and will be amended as and when any changes to the NGR data processing takes place, at the very least it will be reviewed annually.

As the NGR team, we believe that we have done an appropriate amount of research around the implications of the GDPR, including taking heed of the advice and guidance provided by our associated professional membership organisations (AoR, BTPA, PR and the CNHC who give guidance to practicing Reflexologists).

### **13. Effective and structured information risks management**

The risks associated with NGR data, and how that risk is managed is as follows:

- Theft of electronic devices - all have password locks on all electronic devices which are changed regularly and are not shared with anyone.
- Break-in to the office - Some paper files are stored in a locked filing cabinet.
- Theft of paper files- if the team takes any member's details home these will be kept in a secure place.

### **14. Named Data Protection Officer (DPO) and Management Responsibility**

Although not required to have a named DPO, as the Treasurer, whilst in post, I will act as the DPO and will ensure that the NGR remains compliant with GDPR.

### **15. Security Policy**

As detailed in the risk assessment. The electronic equipment used to process members data is based on their industry record as having the most robust inbuilt protection possible.

### **16. Data Breach Policy**

A personal data breach means a breach of security leading to the destruction, loss, alteration, unauthorised disclosure of, or access to, personal data.

The NGR understands that we only have to notify the ICO of a breach where it is likely to result in a risk to the rights and freedoms of individuals.

Where a breach is likely to result in a high risk to the rights and freedoms of individuals, we will notify those concerned directly and without undue delay.

In all cases the NGR will maintain records of personal data breaches, whether or not they were notifiable to the ICO.

**Data Protection Policy created: 28<sup>th</sup> February 2022**

This is a live document and will be updated as and when changes occur.

**Date of Next Review: February 2023, prior to NGR AGM**

**Christine Hall (Treasurer) and Angela Sellens-Drake (Chair)**