

WIMBLEDON COMMUNITY ASSOCIATION (WCA)

GENERAL DATA PROTECTION REGULATION POLICY

The General Data Protection Regulation (GDPR) has transparency at the heart – individuals about whom we hold personal information (Data Subjects) have the right to know the identity and contact details of the data controller.

The WCA Board of Trustees has responsibility for ensuring compliance with GDPR. They decide how Data Subjects' information is used and ensure it is private and secure. They have appointed the WCA Secretary to manage compliance.

Data Subjects have the right to know the purpose and legal basis for which their data is held

The following table identifies the nature of data held by the WCA. All personal information has been collected directly from the following category of Data Subjects.

Category of Data Subject	Type of data held	Legal basis	Retention period	Where stored	Who will data be shared with
Members	Email address and telephone contact number	Legitimate interest to enable membership	Period of membership	<ol style="list-style-type: none"> 1. Member register on 2. Mail Chimp 3. Survey Monkey 4. General email 5. Wimblecomm Website 	Users of Wimblecomm
Users of Wimblecomm website to find a venue	Email address and telephone contact number	Legitimate interest to enable use of Wimblecomm	Two months after contact to allow for statistical analysis	<ol style="list-style-type: none"> 1. Wimblecomm Website 2. General email 	Member venues
Members of the public who use Wimblecomm to contact the WCA	Email address and telephone contact number	Legitimate interest to enable use of Wimblecomm	Two months after contact to allow for statistical analysis	<ol style="list-style-type: none"> 1. Wimblecomm Website 2. General email 	Will not be shared
Employees	Full contact details PAYE records Employment history	In order to comply with the law In order to comply with a contract	Throughout period of employment and seven years after employment ceases	<ol style="list-style-type: none"> 1. Payroll software 2. Hard drive of payroll computer 3. General email 	HMRC and pension provider
Trustees and Secretary	Full contact details	In order to comply with the law	Throughout period of service and statutory period after service ends	<ol style="list-style-type: none"> 1. Register of serving officers held on Secretary's computer hard drive 	Charity Commission and Companies House
Volunteers	Full contact details	Legitimate interest to enable coordination of volunteering activity	Throughout period of service	<ol style="list-style-type: none"> 1. General email 	Other volunteers

Breach notification.

GDPR requires that in the event of a data breach, we must notify the ICO within 72 hours (or explain why we are late) unless it is “*unlikely to result in a risk to the rights and freedoms of natural persons*”. We must also notify anyone (including employees) whose data may have been compromised. All breaches must be recorded. Therefore WCA Secretary must be advised of any breach, record the incident, and consult with the Board of Trustees immediately to decide if the ICO should be notified.

Consent

We will need consent to hold personal data of any individual who is not identified in the table above.

In the event of WCA obtaining consent to hold personal information about Data Subjects, we will make it very clear what data we will be holding, for what purpose and for how long. We will record the point at which consent was given in the GDPR register. It will also be clear that consent can be withdrawn at any point, and it will be clear how this can be achieved.

What to do if consent is withdrawn.

Any information held about a Data Subject will be removed from WCA records within 21 days of the request. The request will be logged in the GDPR register, removal date will be logged, and the Data Subject will be informed that any personal information we hold for them has been deleted.

Requests from Data Subjects regarding their rights ‘to be forgotten,’ rectification, data portability etc.

Data Subjects have the right to have incorrect data corrected and incomplete data completed. Requests should be put in writing to the WCA Secretary, either by post, or by email.

Data Subjects have the right to have their data erased from our records, providing this would be compliant with any overriding laws. Requests should be put in writing to the WCA Secretary, either by post, or by email

All such requests will be acknowledged and actioned within 21 days of the request.

Subject Access Requests

Data Subjects have the right to ask to see what personal data we hold for them. There will be no charge for this.

Requests should be put in writing to the WCA Secretary, either by post, or by email. A full report of from all data sources will be produced within one calendar month.

Transfers of data abroad

Data Subjects have the right to be informed if their data is being transferred abroad. We will advise Data Subjects where this is the case e.g. use of Mail Chimp and Survey Monkey

The Trustees will review the GDPR policy at least annually, to ensure existing policies and procedures are followed and updated or added to (if necessary) on a regular basis.