

VSCC Data Protection Policy

1. **Purposes.** Personal data supplied by members will be obtained, stored, and processed only for the purposes of (a) maintaining members' membership (for example in respect of delivering information about VSCC (Valley Striders Cycling Club) activities, soliciting membership renewals, communicating with their banks regarding financial transactions with VSCC, and (b) furthering the Aims of VSCC (for example by individually soliciting members to lobby councillors, or complete questionnaires).
2. **Consent And Rights.** Personal data is supplied by members on their membership forms, which offer the member the opportunity for the data not to be stored (and therefore to receive no further communication from VSCC). Members will also be separately offered the opportunity to opt out of processing of Personal data for Purpose (b).
3. **Accuracy And Longevity.** Leadership Team members will take reasonable steps to keep Personal data up to date and make corrections in a timely fashion. Personal data will not be stored more than five years after a member fails to renew their membership, and will be deleted at any time at their request. (In either case, data will not necessarily be deleted immediately from backups until they are destroyed as part of a normal backup procedure).
4. **Access.** Only Leadership Team members will normally have access to members' personal data. Only 3 members of the Leadership Team will have access to members' bank account details (the Treasurer, Chair and Club Captain at time of writing). Leadership Team members undertake to take reasonable steps to keep this data secure. Personal data may be made temporarily accessible by Leadership Team members from time to time to people who are not Leadership Team members where those people are assisting the Leadership Team in a specific data processing task permitted by the above Purposes, but such people must first be made aware of and agree to their obligation not to use the data for other purposes and not to store it. Leadership Team members undertake not to retain personal data upon leaving the Leadership Team.
5. **Storage.** Computerised data will not be stored on publicly accessible computers except where a password is required to gain access. Leadership Team members undertake to keep passwords confidential. Personal data will not be stored outside the UK or European Economic Area countries. Original data from membership forms will be retained as a backup, and at least one copy of the data will be made electronically for backup purposes.

Background

(This section does not form part of the Policy but provides background information to the Policy.)

The Data Protection Act 1998 requires (very briefly, and omitting what does not concern us) that:

1. Personal data shall be processed fairly and lawfully and, in particular, shall not be processed unless ... consent is given.
2. Personal data shall be obtained only for one or more specified and lawful purposes and shall not be further processed in any manner incompatible with that purpose or those purposes.
3. Personal data shall be adequate, relevant, and not excessive in relation to its purpose.
4. Personal data shall be accurate and ... kept up to date.
5. Personal data ... shall not be kept for longer than is necessary.
6. Personal data shall be processed in accordance with people's rights. (Among these are controls on direct marketing, and this explicitly includes soliciting members to lobby councillors for example).
7. Appropriate ... measures shall be taken against unauthorised or unlawful processing of personal data and against accidental loss or destruction of, or damage to, personal data.
8. Personal data shall not be transferred to a country ... outside the European Economic Area (with certain exceptions).

As a voluntary (not for profit) group, the Data Protection Act does not require Valley Striders Cycling Club to register with the Information Commissioner. However, we are required to abide by the provisions of the Act. VSCC is also required to comply with GDPR from 25th May 2018.

On March 3rd, 2018, the Committee of Valley Striders Cycling Club agreed a Data Protection Policy.