

## **THE SPECTACLE MAKERS' SOCIETY: Data Protection Policy Statement**

### **Introduction**

The Spectacle Makers' Society is an unincorporated social club which offers events to Freemen, Liverymen and their guests. The Society's administration is carried out by The Clerk's office within The Worshipful Company of Spectacle Makers, which is a registered Data Controller under the Data Protection Act 1998. This Act is shortly to be superseded by the General Data Protection Regulation (GDPR) and by a new Data Protection Act in England and Wales.

The basis of the rules on Data Protection is to formalise procedures whereby organisations hold and use personal data, that is, information relating to a living person. This includes automatic data which could be traced back to an individual such as monitoring of emails or website traffic.

Data may be held in an electronic or manual form but under the Act organisations must protect access to data, must ensure that any data is processed in a fair and reasonable way and give access to the data to the individual themselves on request.

Under the Act, individuals (data subjects) have the right to add information to their records, have inaccurate data deleted and to stop information being used for marketing purposes. Individuals have a legal right to know what data is held and the purposes for which it may be used. Individuals also have a right to know from where information was obtained.

Any individual may make a request to see data held about them (a "subject access request") at any time. Subject access requests must receive a response within a month and at no charge. Subject access requests will only be considered if made by the individual themselves or, where necessary, their legal representatives.

All questions relating to compliance or rights of access should be addressed to the Clerk, by contacting the Worshipful Company of Spectacle Makers' office on 020 7236 2932 or email to [clerk@spectaclemakers.com](mailto:clerk@spectaclemakers.com).

### **Data Principles**

Responsibility for compliance with Data Protection regulations and legislation rests with The Society Committee and the Honorary Secretary, the Clerk. The data held by the Society will be gathered by, and shared with, individual members of the Society Committee and is held purely for the purposes of managing participation in Society events.

Data may need to be transferred to other parties for legal reasons, to enable the production of accounts and audit statements, to process payments made by participants or those acting on their behalf and to pass instructions on to caterers, accommodation agents or other event organisers. The data will remain within the Society's control and no third party will have sufficient identifying information to be able to communicate with Society members individually.

The administration for events is handled by individual members of the Society Committee, assisted by the Honorary Secretary. They will take every care to protect personal data. Data will never be sold or passed to third parties for commercial marketing purposes.

As this is a social organisation, Society members are expected to want to hear about events and see reports of them afterwards which may be in writing, or by email. Questions and messages about events and payments may also require contact by letter, email, telephone or text. Individual Society members have the right to ask at any time not to receive such information or to change the way in which communications are sent, by calling the Honorary Secretary on 020 7236 2932 or email to [clerk@spectaclemakers.com](mailto:clerk@spectaclemakers.com). Society members also have the right to ask not to be featured in photographs which may be published in journals, on the Company website, or on social media.

Wherever possible, data held should remain as up to date and accurate as possible. Individuals who have provided their data to us will be asked to inform us if there is any change. If data does become outdated and/or the individual cannot be contacted, the data will be marked for archive or statistical use only.

The Society does not expect to hold significant sensitive personal data ie that relating to race, religion, political opinion, health, or legal proceedings. Personal data relating to children will be accepted if provided by their parent, grandparent or legal guardian and consent will be requested from the adult concerned for use of the name or image of any child in their care.

Data will not be retained any longer than necessary. Information about attendance at events will be held for a maximum of three years, except for accounting information which must be held for six years. The personal data of guests will be held only in relation to their attendance at events and will not be used for any other purpose (eg membership of the Spectacle Makers' Company) except on their request.

Data will be processed using appropriate technological measures to ensure access can be restricted if required. This includes ensuring that data is password protected and its use is limited to certain individuals only. Data is held in the Cloud, using Microsoft systems which have been confirmed as compliant for the purposes of GDPR.

It is accepted that some data, including financial details such as bank account numbers, may be collected from event participants by telephone or by word of mouth. Telephone lines are not recorded.

The Honorary Secretary will need to be aware of the location of any files, electronic or manual, which contain personal data relating to the Society's work in order to satisfy any subject access requests or to confirm the circumstances of any data protection breach. All advisers, Committee members and volunteers should be aware of their responsibilities in this area and for protection of data whilst in their possession.

### **Data Retention and Security**

The Society will only hold data for as long as necessary. Information about attendance at events will be held for a maximum of three years, except for accounting information which must be held for six years. The personal data of guests will be held only in relation to their attendance at events and will not be used for any other purpose (eg membership of the Spectacle Makers' Company) except on their request. Once an event is over and all accounting and payment records have been reconciled, any paper records will be destroyed by secure means.

Personal data relating to Society Committee members will be maintained for a period of time based upon our assessment of reasonable business need. In the ordinary course, as Committee members receive no payment of expenses or other financial benefits, this will not exceed three years from the date of their stepping down from the Committee. Information such as name, date of birth, dates of appointment and resignation, residence and occupation during the period of appointment and the contribution of Committee members as recorded in minutes of meetings may be held in perpetuity, for archive purposes.

Any individual, including Committee members, may ask at any time for their data to be amended, updated or destroyed. Destruction of data will be subject to legal requirements.

### **Data Breaches**

A personal data breach means a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data. This includes breaches that are the result of both accidental and deliberate causes. It also means that a breach is more than just about losing personal data.

There will be a personal data breach whenever any personal data is lost, destroyed, corrupted or disclosed; if someone accesses the data or passes it on without proper authorisation; or if the data is made unavailable and this unavailability has a significant negative effect on individuals.

Whenever a security incident of this nature takes place, the Honorary Secretary and/or The Chairman will establish as quickly as possible whether a personal data breach has occurred and, if so, promptly take steps to address it and establish the likely risk to each individual concerned. They will inform the Information Commissioner's Office if reporting of a significant data breach is required.

**25 May 2018**

**The Spectacle Makers' Society, c/o WCSM, Apothecaries' Hall, Black Friars Lane, London EC4V 6EL**