

# Data Protection Policy

*Thornbury Picture House*

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## Definitions

<b>Society</b>	means TPH (Thornbury Picture House) a Film Society
<b>GDPR</b>	means the General Data Protection Regulation.
<b>Responsible Person</b>	means The Chairperson (Currently Julie Craig).
<b>Register of Systems</b>	means a register of all systems or contexts in which personal data is processed by the Society.

### 1. Data protection principles

The Society is committed to processing data in accordance with the principles of GDPR.

Article 5 of the GDPR requires that personal data shall be:

- a. processed lawfully, fairly and in a transparent manner in relation to individuals;
- b. collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes; further processing for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes shall not be considered to be incompatible with the initial purposes;
- c. adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed;
- d. accurate and, where necessary, kept up to date; every reasonable step must be taken to ensure that personal data that are inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay;
- e. kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed; personal data may be stored for longer periods insofar as the personal data will be processed solely for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes subject to implementation of the appropriate technical and organisational measures required by the GDPR in order to safeguard the rights and freedoms of individuals; and
- f. 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.”

## **2. General provisions**

- a. This policy applies to all personal data processed by the Society.
- b. The Responsible Person shall take responsibility for the Society's ongoing compliance with this policy.
- c. This policy shall be reviewed at least annually.
- d. The Society need not register with the Information Commissioner's Office because although it does process personal data it is a recreational society and exempt from the need to register.

## **3. Lawful, fair and transparent processing**

- a. To ensure its processing of data is lawful, fair and transparent, the Society shall maintain a Register of Systems.
- b. The Register of Systems shall be reviewed at least annually.
- c. Individuals have the right to access their personal data and any such requests made to the Society shall be dealt with in a timely manner.

## **4. Lawful purposes**

- a. All data processed by the Society must be done on one of the following lawful bases: consent, contract, legal obligation, vital interests, public task or legitimate interests.
- b. The Society shall note the appropriate lawful basis in the Register of Systems.
- c. Where consent is relied upon as a lawful basis for processing data, evidence of opt-in consent shall be kept with the personal data.
- d. Where communications are sent to individuals based on their consent, the option for the individual to revoke their consent should be clearly available and systems should be in place to ensure such revocation is reflected accurately in the Society's systems.

## **5. Data minimisation**

- a. The Society shall ensure that personal data are adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed.

## **6. Accuracy**

- a. The Society shall take reasonable steps to ensure personal data is accurate.
- b. Where necessary for the lawful basis on which data is processed, steps shall be put in place to ensure that personal data is kept up to date.

## **7. Archiving / removal**

- a. To ensure that personal data is kept for no longer than necessary, the Society shall put in place an archiving policy for each area in which personal data is processed and review this process annually.
- b. The archiving policy shall consider what data should/must be retained, for how long, and why.

## **8. Security**

- a. The Society shall ensure that personal data is stored securely using appropriate software that is kept-up-to-date.
- b. Access to personal data shall be limited to personnel who need access and appropriate security should be in place to avoid unauthorised sharing of information.
- c. When personal data is deleted this should be done safely such that the data is irrecoverable.
- d. Appropriate back-up and disaster recovery solutions shall be in place.

## **9. Breach**

In the event of a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data, the Society shall promptly assess the risk to people's rights and freedoms and if appropriate report this breach to the ICO.

## Thornbury Picture House Privacy Policy - Register of Systems

- 1 GDPR sets out the responsibilities of organisations to ensure compliance with the regulations by means of appropriate organisational and procedural arrangements.
- 2 Organisations who only process personal data, among other things, for domestic or recreational reasons are exempt. TPH as a recreational society therefore does not have to register with the ICO, but intends to comply with the GDPR as far as practicable.
- 3 This document sets out the manner and systems by which TPH will process, store and use its member's personal information.
- 4 Data analysis shows that TPH maintains personal information in the form of records of, the name, address, postcode, telephone and mobile numbers, email address and TPH number, amount of subscription and subscription date for each of its members.

The personal information is processed to inform members of upcoming events, of cancellation or changes to the film programme, of special events and reminders for renewal of membership at the start of each new season and to contact members who may have failed to return a DVD or Blu ray to the TPH library.

- 5 Lawful basis to collect information “by Consent”

The personal information is collected either on paper application forms which are self completed by the prospective member or on behalf of the member by a colleague or spouse or other relative. The form has a tick box to confirm that the applicant is content to “opt in” to TPH to hold such records.

The lawful basis for processing such individuals person information will be “by consent”

The application form contains information on what the Society intends to do with the data and how it is stored. Members may be contacted by phone, mobile, email or letter, depending on the urgency of the situation.

The personal information collected on paper membership application forms will never be shared with any other organisation.

## 6 Lawful basis to collect information “by Contract”

Some members apply online through the TPH website and the PayPal system. The name and address, email address and payment date and payment amount are recorded by PayPal and

submitted to TPH by an email to the TPH webmail account. Such members may not explicitly indicate that they are content for their personal information to be stored but nevertheless a payment has been received. The lawful basis for processing such individuals person information will be “by contract”.

The TPH website where the PayPal software is accessible contains the information on what the Society intends to do with the data and how it is stored. Members may be contacted by phone, mobile, email or letter, depending on the urgency of the situation.

The personal information collected by PayPal will never be shared with any other organisation.

TPH does not have access to any personal financial or credit card information other than a payment has been accepted by PayPal and credited to the TPH account.

## 7 Register of systems

The TPH database

The personal information is stored on a laptop computer which is password protected in an Open Office spreadsheet which is also password protected. A backup copy of the spreadsheet is taken on a single memory stick after each data input session has been completed.

Subsets of the data will be processed to provide relevant records (name, email, phone number, address etc.) for the communication purpose intended, when these communication messages have been delivered, the subset will be deleted together with any interim lists which aided the construction of the subset.

## 8 Retention of records

The personal data is held for a period of 2 years from the last annual payment enabling former members to be contacted and given an opportunity to enrol for the following season's film programme.

The paper enrolment forms are shredded within 4 weeks of receipt at TPH.

## 9 Right to erasure or rectification

Individuals who wish to be removed from the TPH register can make a request by sending an "Unsubscribe" message from the website or email [films@thornburypicturehouse.org](mailto:films@thornburypicturehouse.org), or phone or text to 07911145337. Similarly if members believe that data is incomplete or wrong then a request for rectification may be submitted by email, phone or text. Such messages are checked weekly and the action will be completed within 4 weeks.

## 10 Check of eligibility for admittance

No membership cards containing personal data are issued. At each screening a alphabetical list of paid-up members is available at the door and members are "Ticked off" on entry to the hall.

The completed list of ticked names is retained for statistical, research purposes and licensing purposes and shredded at the end of each season.

Eligibility to borrow a Blu ray or DVD will be checked against the alphabetical list and the return of the disc also noted down.

11 **The data controller** who determines the purpose and means of the processing is the chairperson, currently Julie Craig.

12 **The data processor** who is trained to work on behalf of the controller is the Membership Secretary, currently Terry Ray.

13 The data processor must maintain records of the personal data and processing activities and ensure that the records are secure, accurate, adequate, relevant, limited, and up-to-date.

14 Fees,

TPH are exempt because:

A specific exemption applies to bodies or associations that are not established or conducted for profit. However, the exemption applies only if the answer to the following 3 questions is yes:

- Is TPH only processing data for the purposes of establishing or maintaining membership or support for a body or association not established or conducted for profit, or providing or administering activities for individuals who are members of the body or association or have regular contact with it?
- Does TPH hold information only about individuals whose data TPH needs to process for this exempt purpose
- Is the personal data TPH processes restricted to personal information that is necessary for this exempt purpose?

Because the answer is yes to these 3 questions – a data protection fee is not due.

15 Annual Review

The TPH Privacy Policy shall be reviewed every year on the expiry of the then current policy and report of any updates or changes made to a meeting of the TPH committee.