

## Policy for Safeguarding Personal Data

Edition 2, June 2020

### References:

- A. Draft Rules of the Aldershot Branch, Royal Signals Association, Edition 2 dated April 2020

### Introduction

1. The Royal Signals Association (RSA) is a charity, the Trustee of which is the Royal Signals Trust Ltd (RSTL). Within this organisation administered by RHQ Royal Signals, the Aldershot Branch operates semi-independently in what is nominally the GU postcode area.
2. In order to meet its charitable objectives the branch needs to hold personal data on all its members in accordance with Branch Rules (reference A). From 2018 these data were successfully processed in accordance with the General Data Protection Regulations (GDPR). After a period of use there was a need to issue this updated policy documentation.

### Aim

3. The aim of this document is to set out the Policy by which the Personal Data of Members of the Aldershot Branch of the RSA is to be processed in compliance with GDPR to protect the interests of those members.

### Lawful Requirement to Hold Personal Data

4. Within its area of operation the Branch, which has been in existence for 100 years, works to uphold the charitable objectives of the RSA. In order to discharge these responsibilities, in an orderly and efficient way it has a legitimate need to hold Personal Data on the two categories of Branch Members:
  - Life Members who have served in Royal Signals and elected to become members of the Royal Signals Association and to join the Aldershot Branch;
  - Associate Members who are either partners of living or deceased Life Members or other persons who share the ethos and traditions of Royal Signals.
5. Within the terms of GDPR there is thus a lawful basis to hold and process Personal Data to meet the legitimate Interests of the Branch. Since everyone has joined the Branch voluntarily, there is a second lawful basis for holding the data through Consent.

### Responsibilities

6. The committee of the Aldershot Branch of the RSA is the Controller with responsibility for determining how and why data is processed in accordance with this Branch Policy. The Database Manager on the Branch Committee is the Processor of the Personal Data.

### Personal Data required by the Branch

7. The Personal Data of all members is required to enable the effective administration of the Branch by:
  - Producing and maintaining a Membership List;
  - Sending out newsletters and notifications of local meetings and events;

- Circulating committee papers and other documentation relating to the RSA;
- Holding adequate contact information for use in the event of illness or emergencies.
- Enabling fitting tributes to be paid upon the decease of members

### **Personal Data Items to be held by the Branch**

8. To meet the above requirements the following Personal Data will be collected and processed:

**Group 1 - All Branch Members:** title, full name, decorations, postal address, e-mail address, landline and mobile telephone numbers and relevant supplementary notes.

**Group 2 - RSA Life Members:** as above with, in addition, RSA membership number, previous rank and Service dates. Also, when voluntarily supplied, career history information and name of partner.

### **Data Protection Principles**

9. The collection and processing of data in the Branch is to be carried out in accordance with the principles set out in Article 5 of GDPR which states that data must be:

- Processed fairly, lawfully and transparently in relation to the Life Members and Associate Members;
- Collected for the specified purposes set out above and not further processed for incompatible purposes;
- Relevant and limited to what is necessary for the effective work of the group;
- Accurate and kept up to date by adjustments to the Membership List;
- Kept in hard copy and electronic format that permit identification of Life Members and Associate Members while they are active in the Group;
- Processed in a secure way that ensures protection against unauthorised processing, accidental loss, destruction or damage, using the technical and organisational measures set out below.

### **Acquisition and Processing of Personal Data**

10. Personal data is acquired by the Branch in various ways including:

**For Life Members.** Initially data is normally received from RHQ Royal Signals but may also be received in other ways such as from another branch when a member transfers.

**For Associate Members.** Personal data is mainly acquired locally through personal contact but could also be acquired from another branch on the transfer of an Associate Member.

11. In all cases the Processor is to ensure that there is a signed form from the Life Member or Associate Member consenting to use of his or her Personal Data for the purposes required by the Branch. All consent documentation is to be retained on file.

12. The Processor is also to enter the Personal Data onto the Branch Database which is to be kept up to date as circumstances change.

### **Rights of Life Members and Associate Members**

13. Throughout the procedure of collecting, processing and storing data, the Controller and Processor are to be aware of the need to uphold the rights of all members by:

- Informing them through the periodic circulation of Privacy Notices of the way in which their data is being used
- Facilitating when requested:
- Access to their Personal Data;
- Rectification when changes have occurred;
- Erasure;
- Restriction of processing;
- Logging objections.

14. No automated decision making will take place in the Branch.

### **Privacy Notices**

15. Issue of Privacy Notices will be the main way of upholding the first principle of data protection by informing members transparently that their data is being held and processed fairly and lawfully. An example is included at **Annex A**.

### **Security of Personal Data**

16. The following measures and procedures are to be used to ensure the security of Personal Data held by the Branch:

- Transfer of data to and from RHQ to be in accordance with procedures set out by RHQ Royal Signals;
- All data on an individual including Consent responses is to be consolidated on a single hard copy document, the HQ SIGNALS Database Consent Form;
- Consent forms are to be filed and stored securely by the Processor;
- Branch data to be held on the Branch Database;
- A hard copy Membership List is to be produced and distributed to the committee members that require it for the performance of their duties. The full List is not to be transmitted electronically. A nominal roll may be sent annually to comply with RHQ R SIGNALS routine procedures;
- The Membership List is to be updated as changes become apparent and reissued at the discretion of the Processor;
- Personal data on those who have ceased to be members for any reason may be retained for up to one year in case issues arise, but is then to be deleted;
- Previous Membership Lists to be deleted or shredded by all holders as soon as new ones become available;
- Under no circumstances is the Membership List to be made available to another individual or organisation. Individual data elements, such as a phone number, may be passed on to a third party only with the express permission of the Life Member or Associate Member concerned;

- Multiple e-mail addresses in a single e-mail are to be hidden from other recipients by use of the Blind Carbon Copy (BCC) facility;
- Immediate action is to be taken to deal with security breaches including notification to individuals if there is a significant risk to their rights and freedoms. The Controller is to be informed of all breaches.

## Privacy Notice

1. In order to meet its charitable objectives and administer its affairs efficiently, the Aldershot Branch needs to hold some personal information on Life Members of the RSA and Associate Members of the Branch. This is done in a lawful manner in accordance with the detailed procedure set out in our Policy for Safeguarding Personal Data given on our website (See below).

### Who we are

2. As the Data Controller, the Aldershot Branch of the Royal Signals Association, through its elected committee, decides how the personal information provided by you is processed and for what purpose.

### What personal information is collected and why

3. The Branch keeps a record of phone numbers, postal addresses and e-mail addresses to contact you about Branch activities and to keep you informed about matters of interest in the Royal Signals Association.

4. We keep your personal data only for the period during which you remain a member plus a period of up to one year to facilitate subsequent administrative processing.

### Sharing of Data

We do not share your data with any third parties except with your prior consent or if required by law to do so.

### Your rights

You have the right to request:

- A copy of your personal data held by us and if necessary have it amended;
- Erasure of your personal data;
- Withdrawal of your consent to processing.

For further information please refer to our Privacy Policy which can be found on our website at:

<https://royalsignals.org/rsa/wp-content/uploads/sites/5/2020/06/Aldershot-Policy-on-Safeguarding-Personal-Data-Edition-2.pdf>

If you have any queries or want to exercise any of your rights please contact the Branch Data Manager on 07831 606050 or email: [mikeoscar@me.com](mailto:mikeoscar@me.com)