



## LYMM PHOTOGRAPHIC SOCIETY

### PRIVACY NOTICE – Information about personal data

#### Introduction

The Lymm Photographic Society (LPS) acknowledges the legal and regulatory requirements set out in the EU General Data Protection Regulation (GDPR), the UK 1998 Data Protection Act and its forthcoming UK successor (currently the Data Protection Bill). This Privacy Notice also incorporates guidance from the Photographic Society of Great Britain.

#### Summary

LPS uses low risk personal data provided by members/prospective members and other interested parties primarily for club administrative purposes. The primary information held is the person's name and contact details (usually restricted to their email address). This Privacy Notice spells out the personal data that the club holds, the way it processes that information and other relevant information.

#### Information we hold about people

Information relating to :

- Members (incl. club officials (committee members))
- Potential members/others who have expressed an interest in keeping in touch with/being informed about the Society
- Guests/visitors/others who have expressed an interest
- Networking/support contacts (e.g. Lancashire & Cheshire Photographic Union contacts (L&CPU) )
- Limited or occasionally facilities providers, service and other suppliers
- Speakers/presenters
- Press/publicity contacts
- Community organisations and event organisers
- Consents for the use of personal data/information/images provided (where consent is required under GDPR)\*

Types of personal information held :

- Name
- Email address
- Phone number
- Photograph of data subject (person) (incidental or posed, generally for publicity purposes e.g. record of event attended)
- Record of author's images produced for/submitted to/used by the Society
- Record of person's contribution to the society (e.g. title of presentation given, thoughts provided at AGM/Committee meetings)
- Record of membership subs/expenses paid
- Limited bank information (name and sort code) as shown on bank statements as confirmation of any payments into account.

Other limited ad hoc supplementary information may be collected/processed on an exceptional basis and with the data subject's knowledge (e.g. information supplied by them to the Society in an email); this could include postal address for a specific purpose



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*\* consents are primarily recorded using the LPS Membership and Information Consent Form or may be captured through an email-based opt-in. In accordance with the GDPR and also PAGB guidance, the Society is not required to and so does not obtain members' consent to hold their personal information for administrative/similar purposes in connection with the Society's legitimate interests.*

#### Why we hold this information

LPS collects and processes personal data in order to pursue the legitimate interest of running the Society.

Personal Data is used for :

- Membership administration
- General society management, engagements, planning, execution and facilitation including email distribution lists
- Expenses reimbursement and financial management
- Publicity, awareness and promotion of the society
- Maintenance of an archive of society endeavours

#### Who uses this information

Most personal information is retained within the Society for its own internal purposes and it is unlikely to envisage a circumstance for which it would be transferred outside the UK.

As a natural part of pursuing the Society's legitimate interests, a member's name may enter the public domain e.g. as the credited author of an image that appears in an exhibition, on the club website or a in connection with a competition.

They may also be mentioned in the Society's Flickr or social media activity.

Other recipients of personal data (usually restricted to name and perhaps contact information or inclusion of person's image (e.g. in a photo accompanying a press release)) include (depending on circumstances/member's contribution or role within the Society) :

- The Lancashire and Cheshire Photographic Union (L&CPU) and other governing or competition organisations
- Facilities and other suppliers
- The bank and auditors
- The press and publicity providers/media (e.g. local press)
- Organisers of external competitions, exhibitions etc

Where a member's work is entered by the Society into an external competition or exhibition, the Data Protection Policy/Privacy Statement of the organising body applies.

The Society will not cascade to members via email or any other electronic messages any third party commercial marketing material offering goods or services. This does not preclude the Society from any general publicity activity on behalf of others not sent directly to members such as a posting on our Facebook page.



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#### Where do we keep our information?

The Society understands the importance of holding information securely and mostly holds its data electronically, with limited paper-based information.

Electronic :

- The Society's laptop (mainly image author's name)
- Microsoft OneDrive (password protected)
- Potentially some Committee members/supporting members own PCs (e.g. their own email used for administration and management of the club)
- Society's website and social media

Paper :

- Attendance register
- Accounting Ledger/receipt book
- Name badges
- Competition/Exhibition listings and image labels
- Supplementary copies of meeting papers (e.g. AGM minutes)

Where the Society uses tools such as Committee members' own email systems, OneDrive, Flickr, Twitter, Facebook and similar, it is possible that the servers used may be located outside the EEA. This is outside the Society's control and the Society will not use such facilities where it is aware that the privacy protection might subject members' personal data to a high level of risk.

#### How we decide for how long to keep it

The Society bases its decision on whether to delete personal data it holds about its members on the period after which the person concerned is no longer a member. The period since last use is also the criterion used for the deletion of ad hoc personal information relating to others.

Typically the club's current mailing list is reviewed annually around the time of the AGM and obsolete names, email addresses etc removed. Obsolescence is generally where a name has been added but the Society has since had no contact from/with them other than the issue of routine emails. The Society aims to delete old copies of mailing lists after a maximum of 5 years. However the Society's Secretary will endeavour to contact lapsed members/others on the mailing list and seek their consent for continued receipt of Society emails at a more regular frequency.

References to a member or individual which are a matter of record (e.g. expenses paid, references in minutes/similar, their (or related) postings in social media relating to and owned by the Society, mention on the website\*) will not be retrospectively deleted.



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#### Your role in the information we have

Please keep the small amount of information we hold about you up to date.

The Society respects everyone's rights under legal data protection requirements of UK law. Past members may make a request relating to their rights to the Society's Secretary (contact below). Existing members may approach any official of the Society. **Any deletion or non-submission of a current member's information may render it difficult/impossible for them to continue to be a member of the Society for practical, administrative and logistical reasons and because this could prevent the Society from engaging in its legitimate interests.**

Information provided is expected to be accurate and the Society will update its records should the member provide an update or correction.

\*It is the Society's policy to keep a person's submitted images included on the society's website (and potentially Facebook/Flickr) indefinitely (and continuing after the person has ceased to be a member) as this also forms part of a historic record of the Society's activities and is such a "collection". However the Society will delete any such images on request. This usage is considered compatible with the purpose for which the images and associated data were originally collected and are considered an archive collection consistent with Article 5 1(b) of the General Data Protection Regulations.

#### How the Society ensures its compliance with this Privacy Notice

As a very small organisation with a proactive and privacy-aware committee, the Society expects to be self-policing on an ongoing basis.

If any member suspects a breach of this Privacy Notice they are requested to advise the President or Secretary immediately.

The AGM provides a further opportunity to review privacy-related matters.

#### Who to contact

For further information contact the Society's Secretary via [contact@lymmphotosoc.org.uk](mailto:contact@lymmphotosoc.org.uk)

*Issued by The Lymm Photographic Society, June 2018*



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#### Appendix - Instructions for anyone acting on behalf of the Society

Committee members and anyone else supporting the Society's legitimate interests:

1. **Must ensure**, when using their own email system/electronic tools or devices for club purposes, that these are subject to appropriate **security measures** (such as passwords) to prevent use/access to LPS-related personal data other than for Society purposes
2. **Must avoid sharing members' email addresses** with others where that information is not already known. To achieve this, for example, place all members email addresses in the 'bcc' field when issuing a bulk email.
3. **Must not pass on** directly to any members electronically any **direct marketing** emails or material received from commercial third parties selling goods and services. This excludes the passing on of information for legitimate club purposes including from associated bodies or individuals.
4. **Must not pass on** to a third party any LPS-related **personal information** for a purpose other than that for which it was obtained (i.e. for a legitimate Society purpose). This ensures continued separation between the Society as a "data controller" and any other data controller (i.e. any other organisation).
  - For example, assume that you are a committee member of both the LPS and the golf club. If you have Fred's email address in your email system and you obtained his email address in connection with LPS activity, you cannot then email Fred about golf club activity unless you have already obtained Fred's email address additionally and directly through the golf club (without Fred's permission).
  - Personal information obtained for LPS activity must also remain separate from that used for personal/domestic use.