

HEADLEY RINGCRAFT CLUB

Membership Data Privacy Policy

Last Updated: July 26, 2016

Version: 0.01

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INTRODUCTION

This Privacy Policy (“Privacy Policy”) explains how Headley Ringcraft Club [“Headley Club”] - a UK Kennel Club registered dog training club providing a range of dog training services / classes to members of the public - collect, use and disclose “membership personal data” in compliance with information disclosure obligations under the principles of the Data Protection Act 1998 [“DPA”] and related legislation.

The DPA principles ;

- Principle 1 - fair and lawful
- Principle 2 - purposes
- Principle 3 - adequacy
- Principle 4 - accuracy
- Principle 5 - retention
- Principle 6 - rights

The “membership personal data” relates to an individual’s personal contact data that HEADLEY CLUB collects and stores when a member of the public selects to ;

a] become a new club member of HEADLEY CLUB

b] renew their existing club annual membership with HEADLEY CLUB

HEADLEY CLUB respects the privacy rights of it’s Club members and recognises the importance of protecting any personal data information collected.

The main purpose of HEADLEY CLUB’s privacy policy is to protect the interest of it’s Club members whose personal data is collected and processed and this applies to everything that HEADLEY CLUB does with the data - HEADLEY CLUB is not entitled to any data policy exemptions.

HEADLEY CLUB as a dog training service provider uses the following data guidelines ;-

- Data is processed fairly and lawfully
- Data is obtained only for specific, lawful purposes
- Data collected is adequate, relevant and not excessive
- Data is accurate as possible and kept up to date
- Data is not held for any longer than necessary
- Processed in accordance with the rights of data subjects
- Be protected in appropriate ways
- is transparent about how we intend to use the data and highlights this to individuals appropriately when collecting their personal data
- Not be transferred outside the European Economic Area (EEA), unless that country or territory also ensures an adequate level of protection

CHANGES TO OUR PRIVACY POLICY

HEADLEY CLUB may change this Privacy Policy from time to time. If HEADLEY CLUB makes any changes, it will notify by revising the "Last Updated" date at the top of this Privacy Policy.

This policy is available to view 365 24x7 on our website "headleyringcraft.co.uk" and also as a hardcopy form if requested.

DATA INFORMATION COLLECTED

a) HEADLEY CLUB Membership Personal Data

Membership data is collected on an HEADLEY CLUB Membership Application Form - both new and existing members are requested to complete this Form with their personal contact and selected membership type details.

The information collected is visibly identified as :-

Name / address / telephone number / email address

on the "HEADLEY CLUB Membership Form".

COLLECTED DATA USE

Membership Personal Data

Membership personal data is used by HEADLEY CLUB for ;

- HEADLEY CLUB membership statistical purposes - the Club regularly reviews it's membership numbers for attrition / loss in overall annual membership with the aim of looking at improving and monitoring Club services/classes to retain member numbers and attract new membership
- Communicating HEADLEY CLUB quarterly newsletters and a variety of Club event / social / other activity update bulletins
- Communicating HEADLEY CLUB club / committee / class changes and/or information, for example, AGM details, updated membership forms

DISCLOSING COLLECTED DATA

Membership Personal Data

HEADLEY CLUB membership personal data is disclosed, forwarded and/or made accessible to ;-

1. HEADLEY CLUB elected committee members - membership personal data is shared with HEADLEY CLUB volunteer committee members for the purpose of membership statistical review - this is normally at membership number summary level rather than at individual membership detail level.
2. HEADLEY CLUB volunteer trainers and/or training assistants - membership individual data may be shared with elected HEADLEY CLUB class trainers and/or assistants normally arising from a training class enquiry and/or class training item.
3. Kennel Club inspection officers - membership data is made available for inspection by members of the UK Kennel Club [KC] after data access has been agreed and granted by the KC Honourable Secretary.

Membership personal data is not disclosed, forwarded and/or made accessible to any other third party organisation, service provider or other members of the public outside of the above remit.

RETAINING COLLECTED DATA

Membership Personal Data

Membership personal data is held at a single retention point by the elected HEADLEY CLUB Membership Secretary in form of ;

- Original hardcopy Membership Form
- Electronic copy of the original hardcopy Membership Form - Data extracted from the membership form is stored on a computerized spreadsheet

Hardcopy Membership Form

Collectively held at a separate location and/or area to that of the Electronic copy.

Retained whilst a Club member has a current annual membership paid up to date.

If the Member terminates their Club membership then HEADLEY CLUB retains the Membership Form for a duration of 6 months thereafter it is permanently deleted - data is not archived.

Electronic Membership data

Collectively held at a separate location and/or area to that of the Hardcopy Membership Form.

Retained whilst a Club member has a current annual membership paid up to date.

If the Member terminates their membership then HEADLEY CLUB retains the Membership Electronic copy data for a duration of 6 months thereafter it is permanently deleted - data is not archived.

SECURITY OF DATA

Hardcopy Membership personal data

HEADLEY CLUB deploys the following strategy to its data information / files to help prevent data loss and/or unauthorized access to the data ;-

- Safe storage of hardcopy files in locked, secure filing cabinet[s] in a location / area separate to that of HEADLEY CLUB membership computer system[s]
- Filing cabinet “key lock” access is restricted to HEADLEY CLUB membership secretary

Electronic Membership personal data

HEADLEY CLUB deploys the following strategy to its data information / files to help prevent data loss and/or unauthorized access to the data ;-

- Safe storage of data files stored on removable storage devices eg., USB/CD which are kept in a separate secure location / area to that of it’s hardcopy files
- The use of industry accredited anti-virus software on computers and network services to help protect against viruses, spyware, malware and other online threats
- Uses a system of passwords so that access to computer systems / networks and data is restricted to authorized users only
- Computer systems are always logged off and/or turned off when unattended or not in use
- Regular backups of data files that are stored in more than one location
- Data is not stored on any other third party ‘data storage’ system eg iCloud or other social media portals

AMENDMENTS TO DATA

Membership personal data

Personal data shall be accurate and, where necessary, kept up to date.

HEADLEY CLUB requests members to renew their Club membership on an annual basis at 1 January by requesting they complete and submit a Membership Form to the Membership Secretary.

This gives opportunity for members to ensure they provide accurate and current personal membership details to the Club - it is impractical to check the accuracy of membership personal data that the member has provided as it is difficult to obtain independent confirmation that the data is accurate and in recognition of this fact, the Data Protection Act states that as long as HEADLEY CLUB has accurately recorded information provided by the member it will not have breached the fourth data protection principle [DPA Principle 4 ; Personal data shall be accurate and, where necessary, kept up to date].

MEMBER RIGHTS TO DATA

The Data Protection Act gives rights to individuals in respect of the personal data that organisations hold about them.

A member may at any time request to see a copy of the personal data that HEADLEY CLUB holds and HEADLEY CLUB has a legal 40 day timeline from the date of the data subject access to provide the data information to the member.

MEMBER COMPLAINTS

If a Member is concerned about HEADLEY CLUB data information practices, HEADLEY CLUB as a responsible dog training service provider will respond to any information rights it receives, clarifying how it has processed the Member personal data information and explaining how it will try to put right anything that has gone wrong.

If a member of the public has engaged with HEADLEY CLUB but is still dissatisfied, they have a legal right to report their concern to the Government body - the ICO [Information Commissioners Office].

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