



Blockweb CLG Data Protection Policy

Introduction

The General Data Protection Regulation ('GDPR')¹ applies to the processing of personal data. Blockweb CLG ('the Company'), as a Data Controller, is committed to complying with its legal obligations in this regard.

This policy covers any individual whose personal data the Company processes. The Company collects and processes limited personal data relating attendees at its events only. The Company does not, at present, have any employees.

Processing of data includes collecting, recording, storing, altering, disclosing, destroying and blocking data. Personal information kept by the Company is stored in manual files and/or on an electronic database. The Company undertakes that only authorised personnel have access to the database of attendees' details. The Company has appropriate security measures in place to protect against unauthorised access e.g. access to the database of attendees is password protected and limited.

Collection and storage of information

The Company processes names and email addresses of event attendees. The Company ensures that personal information is processed in accordance with the principles of data protection, as required by GDPR'.²

The Company is under a legal obligation to keep certain information for a specified period of time e.g. to ensure compliance with its reporting obligations under the Charities Act 2009 and the Companies Act 2014. In addition, the Company needs to keep certain information for a period of time in order to maintain a database of event attendees. Attendees are routinely asked to consent to the retention and use of their personal data for this purpose.

Security and disclosure of information

The Company takes all reasonable steps to ensure that appropriate security measures are in place to protect the confidentiality of both electronically and manually held personal data. Security measures are reviewed from time to time having regard to the technology available, the cost and the risk of unauthorised access. Directors with responsibility for processing personal data must implement all current security policies and procedures e.g. use of computer passwords, locking filing cabinets etc.

Personal data relevant to event attendees will only be processed for activity and event related purposes and in general will not be disclosed to third parties except where required or authorised by law or with the agreement of the individual attendee.

¹ See Appendix 1

² See Appendix 2

Designated Data Protection Contact

The Company Secretary for the time being bears overall responsibility for ensuring compliance with data protection legislation.

Access Requests

Event attendees are entitled to request information held about them in electronic format or in relevant manual filing sets. The Company will provide this information within 30 days. There is no charge for requesting this information.

A request should be made in writing to the Company Secretary stating the exact information required. A Data Subject is only entitled to information about themselves and will not be provided with information relating to other Confreres, Donors or third parties. Information that is classified as the opinion of another person, will be provided unless it was given on the understanding that it will be treated confidentially.

Appendix 1 - Definitions

The following terminology is used in this policy.

'personal data' means any information relating to an identified or identifiable natural person ('data subject'); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person;

'processing' means any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction;

'filing system' means any structured set of personal data which are accessible according to specific criteria, whether centralised, decentralised or dispersed on a functional or geographical basis;

'controller' means the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data; where the purposes and means of such processing are determined by Union or Member State law, the controller or the specific criteria for its nomination may be provided for by Union or Member State law;

'third party' means a natural or legal person, public authority, agency or body other than the data subject, controller, processor and persons who, under the direct authority of the controller or processor, are authorised to process personal data.

Appendix 2 Data Protection Principles

The Company is committed to complying with the following data protection principles regarding personal information processed by it.

- The data will be obtained and processed fairly. Data subjects will be told why the information is needed and given an explanation of what use may be made of such information. The information will not be used for any other purpose.
- The information held by the Company will be accurate and complete and kept up to date.
- The data shall be obtained for one or more specified, explicit and legitimate purpose(s).
- The information shall be adequate, relevant and not excessive in relation to that purpose / purposes, for which they were collected or are further processed.
- The data shall not be further processed in a manner incompatible with those purposes. For instance, information collected and kept on Donors for fundraising reasons should not be used for any other purpose, unless specified in advance.
- The data kept will be in proportion to the use which they are put.
- Personal Information shall not be kept for longer than is necessary. The Company will endeavour to review files on an ongoing basis to ensure information is not retained for longer than necessary.
- Appropriate security measures will be taken against unauthorised access to, or alteration, disclosure or destruction of, the data and against their accidental loss or destruction.

