



National Pensioners Convention

Data Protection Policy

1. INTRODUCTION

1.1 The National Pensioners Convention needs to gather and use certain information about individuals. These can include members, affiliates, suppliers, business contacts, employees and other people the organisation has a relationship with or may need to contact. This policy describes how these personal data must be collected, handled and stored to meet the South East National Pensioners Convention data protection standards, and to comply with the law.

1.2 The National Pensioners Convention is committed to safeguarding the privacy of their members, affiliates, volunteers and staff.

2. WHY THE POLICY EXISTS

2.1 This data protection policy ensures the National Pensioners Convention:

- Complies with data protection law and follows good practice.
- Protects the rights of staff, members and affiliates
- Is open about how it stores and processes individuals' data.
- Protects itself from the risks of a data breach.

3. DATA PROTECTION LAW

3.1 The Data Protection Act 1998 and the EU General Data Regulation 2018 describes how organisations must collect, handle and store personal information. These rules apply regardless of whether data are stored electronically, on paper or on other materials. To comply with the law, personal information must be collected and used fairly, stored safely and not disclosed unlawfully.

4. POLICY SCOPE

4.1 This policy applies to:

- The National Pensioners Convention.
- All staff and volunteers of the National Pensioners Convention.
- All contractors, suppliers and other people working on behalf of the South East South East National Pensioners Convention.

4.2 It applies to all data that the National Pensioners Convention holds relating to identifiable individuals, even if that information technically falls outside of the Data Protection Act 1998 and General Data Protection Regulation (2018). This can include:

- Names of individuals; postal addresses; email addresses; telephone numbers; plus any other information relating to individuals.

5. DATA PROTECTION RISKS

5.1 This policy helps to protect the National Pensioners Convention from some very real data security risks, including:

- Breaches of confidentiality. For instance, information being given out inappropriately.
- Failing to offer choice. For instance, all individuals should be free to choose how the South East South East National Pensioners Convention uses data relating to them.
- Reputational damage. For instance, the South East South East National Pensioners Convention could suffer if hackers successfully gained access to sensitive data.

6. HOW DO WE USE YOUR PERSONAL DATA

6.1. The NPC may process data about yourself including your email address, phone number and postal address.

7. RESPONSIBILITIES

7.1 Everyone who works for or with the National Pensioners Convention has some responsibility for ensuring data is collected, stored and handled appropriately. Each team that handles personal data must ensure that it is handled and processed in line with this policy and data protection principles. However, these people have key areas of responsibility:

- **The Officers Committee** is ultimately responsible for ensuring that the National Pensioners Convention meets its legal obligations.
- **The General Secretary** is responsible for:
 - Keeping the Officers Committee updated about data protection responsibilities, risks and issues.
 - Reviewing all data protection procedures and related policies, in line with an agreed schedule. Arranging data protection training and advice for the people covered by this policy.

- Handling data protection questions from staff and anyone else covered by this policy.
- Dealing with requests from individuals to see the data the South East South East National Pensioners Convention holds about them (also called “subject access requests”).
- Checking and approving any contracts or agreements with third parties that may handle the South East National Pensioners Convention sensitive data.
- Approving any data protection statements attached to communications such as leaflets.
- Addressing any data protection queries from journalists or media outlets like newspapers.
- Where necessary, working with other staff to ensure marketing initiatives abide by data protection principles.
- **The National Officer** is responsible for:
 - Ensuring all systems, services and equipment used for storing data meet acceptable security standards.
 - Performing regular checks and scans to ensure security hardware and software is functioning properly.
 - Evaluating any third party services the South East National Pensioners Convention is considering using to store or process data. For instance, cloud computing services.

8. GENERAL STAFF GUIDELINES

- The only people able to access data covered by this policy should be those who need it for their work.
- Data should not be shared informally. When access to confidential information is required, employees can request it from their line managers.
- The National Pensioners Convention will provide training to all employees to help them understand their responsibilities when handling data.
- Employees should keep all data secure by taking sensible precautions and following the guidelines below.
- In particular, strong passwords must be used and they should never be shared.
- Personal data should not be disclosed to unauthorized people, either within the South East National Pensioners Convention or externally.

- Data should be regularly reviewed and updated if it is found to be out of date. If no longer required, it should be deleted and disposed of.
- Employees should request help from the General Secretary or National Officer if they are unsure about any aspect of data protection.

9. DATA STORAGE

9.1 These rules describe how and where data should be safely stored. Questions about storing data safely can be directed to the General Secretary.

9.2 When data is stored on paper, it should be kept in a secure place where unauthorized people cannot see it.

9.3 These guidelines also apply to data that is usually stored electronically but has been printed out for some reason:

- When not required, the paper or files should be kept in a locked drawer or filing cabinet.
- Employees should make sure paper and printouts are not left where unauthorized people could see them, like on a printer.
- Data printouts should be shredded and disposed of securely when no longer required.

9.4 When data is stored electronically, it must be protected from unauthorized access, accidental deletion and malicious hacking attempts:

- Data should be protected by strong passwords that are changed regularly and never shared between employees.
- If data is stored on removable media (like a CD or DVD), these should be kept locked away securely when not being used.
- Data should only be stored on designated drives and servers, and should only be uploaded to an approved cloud computing service.
- Servers containing personal data should be sited in a secure location, away from general office space.
- Data should be backed up frequently. Those backups should be tested regularly, in line with the National Pensioners Convention's standard backup procedures.
- Data should never be saved directly to laptops or other mobile devices like tablets or smart phones.

- All servers and computers containing data should be protected by approved security software and a firewall.

10. DATA USE

10.1 Personal data is of no value to the National Pensioners Convention unless the business can make use of it. However, it is when personal data is accessed and used that it can be at the greatest risk of loss, corruption or theft:

- When working with personal data, employees should ensure the screens of their computers are always locked when left unattended.
- Personal data should not be shared informally. In particular, it should never be sent by email, as this form of communication is not secure.
- Data must be encrypted before being transferred electronically. The IT Coordinator can explain how to send data to authorized external contacts.
- Personal data should never be transferred outside of the European Economic Area.
- Employees should not save copies of personal data to their own computers. Always access and update the central copy of any data.

11. DATA ACCURACY

11.1 The law requires the National Pensioners Convention to take reasonable steps to ensure data is kept accurate and up to date. The more important it is that the personal data is accurate, the greater the effort that should be made into ensuring its accuracy. It is the responsibility of all employees who work with data to take reasonable steps to ensure it is kept as accurate and up to date as possible.

- Data will be held in as few places as necessary. Staff should not create any unnecessary additional data sets.
- Staff should take every opportunity to ensure data is updated. For instance, by confirming a customer's details when they call.
- The South East National Pensioners Convention will make it easy for data subjects to update the information it holds about them. For instance, via the South East National Pensioners Convention website.
- Data should be updated as inaccuracies are discovered. For instance, if a customer can no longer be reached on their stored telephone number, it should be removed from the database.

- It is the Marketing Co-ordinator's responsibility to ensure marketing databases are checked against industry suppression files every six months.

12. SUBJECT ACCESS REQUESTS

12.1 All individuals who are the subject of personal data held by the National Pensioners Convention are entitled to:

- Ask what information the company holds about them and why.
- Ask how to gain access to it.
- Be informed how to keep it up to date.
- Be informed how the National Pensioners Convention is meeting its data protection obligations.

12.2 If an individual contacts the National Pensioners Convention requesting this information, this is called a subject access request. Such requests should be made by mail or email, addressed to the General Secretary. Individuals will not be charged for subject access requests. The General Secretary will aim to provide the relevant data within 14 days. The General Secretary will always verify the identity of anyone making a subject access request before handing over any information.

13. DISCLOSING DATA FOR OTHER REASONS

13.1 In certain circumstances, the Data Protection Act allows personal data to be disclosed to law enforcement or other agencies without the consent of the data subject. Under these circumstances, the South East National Pensioners Convention will disclose requested data. However, the General Secretary will ensure the request is legitimate, seeking assistance from the Executive Council and the South East National Pensioners Convention's legal advisers where necessary.

14. PROVIDING INFORMATION

14.1 The National Pensioners Convention aims to ensure that individuals are aware that their data is being processed, and that they understand:

- How the data is being used.
- How to exercise their rights.

14.2 To these ends, the National Pensioners Convention has a privacy statement, setting out how data relating to individuals is used by the National Pensioners Convention. This is available on request and is also available on the National Pensioners Convention's website.

Signed on behalf of the Executive Committee: JAN SHORTT

Date: 22nd May 2018

Review Date: 22nd May 2019

National Pensioners Convention Data Protection Statement

The National Pensioners Convention needs to gather and use certain information about individuals. These can include members, affiliates, suppliers, business contacts, employees and other people the organisation has a relationship with or may need to contact. This Statement summarizes how this personal data will be collected, handled and stored to meet the National Pensioners Convention data protection standards, and to comply with the law.

We will:

1. Collect individual's data to enable us to provide them with the best possible service; to improve the quality of existing services; to enable the development of new services to meet individual's needs.
2. Individual's data will be obtained, processed and stored in accordance with the requirements of the Data Protection Act 1998 and EU General Data Protection Regulation 2018,
3. Provide individuals with the opportunity to review what data is held relating to them.
4. Not share individual's data with third parties without the individual's consent unless required to do so by law.

Subject Access Requests

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- Ask how to gain access to it.
- Be informed how to keep it up to date.
- Be informed how the National Pensioners Convention is meeting its data protection obligations.

If an individual contacts the National Pensioners Convention requesting this information, this is called a subject access request. Such requests should be made by mail or email, addressed to the National Officer. Individuals will not be charged for their subject access request. The National Officer will aim to provide the relevant data within 14 days. The National Officer will always verify the identity of anyone making a subject access request before handing over any information.

Approved by the Executive Committee _____

Date _____

Review Date _____