Data protection law and England and Wales is primarily found in the Data Protection Act 1998 ('DPA'), with effect from 25 May 2018, the DPA will be replaced and updated by the General Data Protection Regulation ('GDPR') which will be supplemented by the Data Protection Act 2017. In any policy reference to the DPA and in any reference to the DPA 17, whichever is in force at the time.

WCMPC and MPC CHARITY DATA PROTECTION POLICY

This policy covers the following:

1. Background
2. Applicable data protection law
3. The data protection principles
4. Data subjects’ rights
5. Data subjects’ responsibilities
6. Third party processors
7. Third party controllers
8. Further information

WCMPC and MPC CHARITY DATA PROTECTION POLICY

This policy covers the following categories of personal data:

Staff: The Company may use personal data about its employees for a variety of purposes; for instance, to store information such as contact details and record of employment with the Company.

Members: The Company holds the personal data of its past, present and prospective members (Liverymen, Freemen, Senior Freemen, Yeomen, Apprentice Liverymen and Apprentice Freemen (the ‘Members’)). The personal data field includes a wide range of information about Members, in particular personal data for charitable, cultural and educational aims. The Company processes personal data about its Members for administrative and record-keeping purposes.

Beneficiaries: The Company’s charitable and educational activities have been a fundamental objective throughout its history. In order to further its charitable and educational aims, the Company may process personal data about beneficiaries and enquirers to make decisions about how to provide assistance, whether or not to provide assistance and to conduct compulsory audits of organisations’ data handling practices.

The public: The Company may enter into correspondence with members of the public and process personal data about enquirers and correspondents for administrative and record-keeping purposes. The public includes enquirers, correspondents, applicants to Company events, and suppliers.

Membership: The Company holds the personal data of its Members. The Company processes such information in order to respond to queries and deal with ad hoc issues.

The Company holds some information about its members and staff as well as members of the public; for administrative and record-keeping purposes. The Company processes personal data about its Members and Staff for administrative and record-keeping purposes.

The Company may use personal data for a variety of purposes; for instance, to store personal data such as contact details and record of employment with the Company.

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The special categories of personal data require a higher standard of care. If a personal data breach (as defined) occurs relating to special categories of personal data, the ICO will regard this as a serious breach. The Company must therefore take appropriate measures that are proportionate to the risk that the personal data might be subject to unlawful access, unauthorised disclosure or other unlawful or illegal processing.

vi. Accountability

The Company should implement appropriate safeguards, such as allowing data subjects to request a prompt, having satisfied itself as to the requester's identity.

Personal data must be kept accurate, and up to date. The Company must ensure that the personal data that is strictly necessary for the purpose for which it was collected is as accurate and up to date as possible. The Company should take appropriate measures that are proportionate to the risk that the personal data might be subject to unlawful access, unauthorised disclosure or other unlawful or illegal processing.

This principle requires that the purposes for which personal data are processed are specified at the time of collection. In other words, the purposes for which personal data are processed must be clear and not overly broad. The data subject must be informed of the purposes for which personal data are being processed, or are to be processed, and any third party recipients of the personal data. A complete list of the information that must be provided to data subjects can be found in Articles 13 and 14 of the GDPR. The Company should only process personal data for those purposes specified in the transparency information that has been given to data subjects. The consent of the data subject is only valid if the personal data are processed for the special categories of personal data are different.

The Company should take appropriate measures that are proportionate to the risk that the personal data might be subject to unlawful access, unauthorised disclosure or other unlawful or illegal processing.
The Company should regularly review the activities and processes of any third party processors with its internal processes; complying with relevant requirements under the Data Protection Act 2018. The Company should also ensure that any agreements entered into with third party processors meet the requirements of GDPR.

The rules around the appointment of processors (the meaning of which is explained in Section 3, above) are strict, and amount to an organisational security measure. Under Article 35 of the GDPR, the Company is required to undertake a DPIA when a type of processing in particular using new technologies, and taking into account the nature, scope, context and purposes of the processing, is likely to result in a high risk to the rights and freedoms of the individuals concerned. The Company must only use processors that guarantee they will meet the requirements of GDPR.

The Company will keep this conclusion under review, including any guidance issued from ICO, or practice in other similar schemes.

Before the GDPR comes into force, the Company must ensure that it has a written management plan in place. In the event of a data protection breach, the ICO would expect the Company to have a documented data protection breach management plan. The Company must process personal data in accordance with the principles set out in Article 5 (fairness and lawfulness of processing, purpose limitation, data minimisation, accuracy, storage limitation, integrity and confidentiality, and accountability).

The ICO would expect the Company to have a documented data protection breach management plan. Under the GDPR, if a data security breach occurs, the Company (as controller) is obliged to give effect to a request in a number of specific situations, the most relevant of which are likely to be:

- The right to rectification
- The right to erasure
- The right to restrict processing
- The right to data portability
- The right to object

The Company will keep this conclusion under review, including any guidance issued from ICO, or practice in other similar schemes.

7. Third party processors

The rules around the appointment of processors (the meaning of which is explained in Section 3, above) are strict, and amount to an organisational security measure. Under Article 35 of the GDPR, the Company is required to undertake a DPIA when a type of processing in particular using new technologies, and taking into account the nature, scope, context and purposes of the processing, is likely to result in a high risk to the rights and freedoms of the individuals concerned. The Company must only use processors that guarantee they will meet the requirements of GDPR.

The Company will keep this conclusion under review, including any guidance issued from ICO, or practice in other similar schemes.

8. Further information

For further information about this policy, and the Company's data handling practices in general, contact the data protection officer at clerk@makersofplayingcards.co.uk or Tel: 01869 389958.