

Karmann Ghia Owners Club (GB)

Data Protection Policy

The General Data Protection Regulation (GDPR) is the new regulation introduced by the EU which will be effective on May 25th 2018. The purpose of the new regulation is to give the public control of their data, as well as encouraging businesses to be more proactive in protecting and handling data in a more secure way. This document has been created so that KGOC(GB) complies with this regulation.

Introduction

As a club that holds and processes personal information about its club members, KGOC(GB) is legally obliged to protect that information under the Data Protection Act. With regard to this information, KGOC(GB):

- Only collects information that is needed for a specific purpose;
- Ensures all information is held securely;
- Ensure the information is relevant and kept up to date as far as is feasible;
- Only hold as much information as is required, and only for as long as it is needed; and
- The club allows the subject of the information to see it on request

Definitions

Club purposes: The purposes for which personal data may be used by the Club. This is to facilitate the operation of a car club to promote interest in the Karmann Ghia. This will include collection of annual subscriptions, publication and distribution of a quarterly magazine and notification about events and other club related matters.

Scope

This policy applies to all club committee members and officers and may be supplemented or amended by additional policies and guidelines from time to time.

Fair and lawful processing

The club must process personal data fairly and lawfully in accordance with individual members' rights. This means that personal data should not be processed unless the individual whose details are to be processed has given consent.

KGOC(GB) Committee Responsibilities:

- Reviewing all data protection procedures and policies on a periodic basis;
- Responding to individuals who wish to know what data is being held on them by KGOC(GB)
- Checking and approving with third parties that handle the Clubs data to ensure appropriate contracts or agreements regarding data processing and protection are in place;
- Ensure all systems, services, software and equipment meet acceptable security standards;
- Ensuring security hardware and software are appropriately scanned on a regular basis

The Processing of all Data Must be:

- Necessary to deliver the club's objectives;
- In the legitimate interests of the club and not unduly prejudice an individual's privacy;

KGOC(GB) have a Privacy Policy which

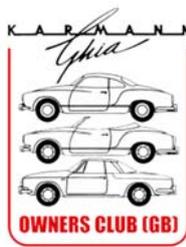
- Sets out the purposes for which KGOC(GB) hold personal data on members;
- Provides that members have a right of access to the personal data that the club holds about them.

Accuracy and Relevance

KGOC(GB) will ensure that any personal data processed is accurate, adequate, relevant and not excessive, given the purpose for which it was obtained. The club will not process personal data obtained for one purpose for any unconnected purpose unless the individual concerned has agreed to this or would otherwise reasonably expect this. Individuals may ask that KGOC(GB) corrects inaccurate personal data relating to them.

Data Security

KGOC(GB) Committee members must keep personal data secure against loss or misuse, in line with the guidance below with storing data securely. Where other organisations process personal data as a service on the club's behalf, the Committee will establish what, if any, additional specific data security arrangements need to be implemented in contracts with those third party organisations.



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Storing Data Securely

- In cases when data is stored on printed paper, it should be kept in a secure place
- Printed data should be shredded when it is no longer needed;
- Data stored on a computer should be protected by strong passwords that are changed regularly and through the use, on the PC upon which the data is stored, of proprietary, recognised secure malware and virus protection software. This must be kept up to date;
- Data stored on CDs or memory sticks must be locked away securely when they are not being used;
- All digital storage devices containing personal data must be password protected and secure;
- All Committee members will sign a declaration of confidentiality.

Data Retention

KGOC(GB) will not store personal data for any longer than is necessary.

Transferring Data Internationally

There are restrictions on international transfers of personal data. KGOC(GB) does not intend to transfer any such data in this way.

Subject Access Requests

Under the Data Protection Act 1998, and any legislation that subsequently updates it, individuals are entitled, subject to certain exceptions, to request access to information held about them.

All subject access requests must be referred immediately to the chair and vice chair.

Processing Data in Accordance with the Individual's Rights

All Committee members must abide by any request from an individual not to use their personal data for direct marketing purposes.

KGOC(GB) will not send direct marketing material to someone electronically (e.g. via email) unless there is an existing business relationship with them in relation to the services being marketed, or they have opted into contract, such as fulfilment of the distribution of the Club magazine.

GDPR provisions

Where not specified previously in this policy, the following provisions will be in effect on or before 25 May 2018.

Marketing Activities

In all direct marketing, materials must:

- Include approved data protection statements attached to emails and other marketing copy;
- Address data protection queries from individuals;
- Be verified by Committee minute to ensure all marketing initiatives adhere to data protection laws and the club's Data Protection Policy

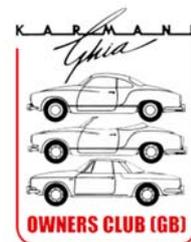
Conditions for Processing

KGOC(GB) will ensure any use of personal data is justified using at least one of the conditions for processing, (the six conditions are set out in the following section) and this will be specifically documented. The conditions for processing will be available to data subjects in the form of a privacy policy.

Justification for personal data

KGOC(GB) will process personal data in compliance with all six data protection principles. Any processing is based on the principles that can be found in Article 5(1) GDPR.

1. Lawfulness, fairness and transparency.
Any personal data is processed in a lawful, fair and transparent manner in relation to data subjects. Transparency implies that any information and communication concerning the processing of personal data must be easily accessible and easy to understand, using clear and plain language. This principle will ensure that the data subject receives information on the identity of controllers and purposes of the processing of personal data.
2. Purpose limitation.



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Personal data is to be collected only for specified, explicit and legitimate purposes and it is not allowed to process them further in a way that is not compatible with those purposes. Further processing for the purposes of the public interest, scientific or historical research or statistical purposes is not considered as incompatible with the initial purpose and is therefore allowed.

3. Data minimisation.

Personal data must be adequate, relevant and limited to what is necessary in relation to the purpose for which it is processed. Data cannot be processed unless it is needed to be processed in order to achieve the above-mentioned purposes.

4. Accuracy.

Personal data is accurate and kept up to date where necessary. Personal data that is inaccurate – considering the purposes for their processing – must be deleted or rectified without any delay.

5. Storage limitation.

Personal data must be kept in a form that makes it possible to identify data subjects for no longer than is necessary for the purposes of the processing. Storing data for longer periods is allowed when the processing of the data will aim at achieving purposes in the public interest, scientific or historical research purposes or statistical purposes. In these cases rights and freedoms of data subjects must be safeguarded.

6. Integrity and confidentiality.

In the processing of personal data appropriate security of personal data is ensured. This should include protection against unauthorised or unlawful processing, destruction and damage. Appropriate technical or organisational measures are to be taken in order to comply with this requirement: such data security measures can include the use of encryption and authentication and authorisation mechanisms.

Consent

The data that is collected by KGOC(GB) is subject to active consent by the data subject. This consent can be revoked at any time.

Data Portability

Upon request, a data subject should have the right to receive a copy of their data in a structured format. These requests should be processed within one month, provided there is no undue burden and it does not compromise the privacy of other individuals. A data subject may also request that their data is transferred directly to another system. This must be carried out at no cost.

Right to be Forgotten

A data subject may request that any information held on them is deleted or removed, and any third parties who process or use that data must also comply with the request. An erasure request can only be refused if an exemption applies.

Privacy by Design and Default

Privacy by design is an approach to projects that promote privacy and data protection compliance from the start. A KGOC(GB) officer will be responsible for conducting Privacy Impact Assessments and ensuring that all IT projects commence with a privacy plan. When relevant, and when it does not have a negative impact on the data subject, privacy settings will be set to the most private by default.

Reporting Breaches

Any compliance failure will be notified to the chair and vice chair to take the following action:

- Investigate the failure and take remedial steps if necessary
- Maintain a register of compliance failures
- Notify the Supervisory Authority (ICO) of any compliance failures that are material either in their own right or as part of a pattern of failures

Monitoring

All KGOC(GB) Committee members must observe this policy which will be monitored on a continuous basis by the Committee at each meeting.