



# GDPR Policy

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The club must comply with the General Data Protection Regulations (GDPR) laws and policies. To that end it was decided that the Haverfordwest Model Club (HMC) adopts the policy document from the British Model Flying Association (BMFA).

The club and its Officers and rules will always be governed by current UK law and any additional laws and/or advice policies and procedures advised by Government or the Information Commissioners Office (ICO).

## 1 Appoint a “Data Protection Compliance Manager”

This person acts as the clubs contact for any data protection issues.

They can be the existing data processor (user of the data).

They do not need to be registered with the ICO

The Committee will ensure DPCM is aware of reporting procedures in the event of a data breach

## 2 The Club will ensure that the DPCM conducts an ANNUAL Data Audit that covers the following points;

What data do we collect?

Is the data necessary?

How is the data stored?

Who has access to the data?

Who do we share the data with?

What security measures are in place to protect data?

## 3 The DPCM will ensure any stored data is secured with limited access

Ensure PC’s storing data are password protected, patched with the latest software and have up to date anti-virus protection.

Restrict access to the minimum number of processors (Treasurer and Secretary).

Whenever possible use the new BMFA Membership portal to store the membership details.

Ensure hard copies of data are stored securely

## 4 The Club will introduce a Club Privacy Policy.

Ensure Privacy notice is on our website.

Communicate Privacy Notice to all members and new members when joining.

If using electronic communications to members gather consent from all existing members and new members when they join. This requires a *positive action* from the individual.

*Note that consent is not required for what can be considered as “club management” communications. (AGM notices for example).*