

# Oxen Park Cinema Club

## Data Protection Policy

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### Data Protection Policy (revised May 2018)

Name of Charity: Oxen Park Cinema Club (OPCC)

#### Introduction

We are committed to a policy of protecting the rights and privacy of individuals. We need to collect and use certain types of Data in order to carry on our work of managing Oxen Park Cinema Club (OPCC). This personal information must be collected and handled securely.

The Data Protection Act 1998 (DPA) and General Data Protection Regulations (GDPR) govern the use of information about people (personal data). Personal data can be held on computers, laptops and mobile devices, or in a manual file, and includes email, minutes of meetings, and photographs.

The charity will remain the data controller for the information held. The trustees (committee) are responsible for processing and using personal information in accordance with the Data Protection Act and GDPR. Trustees who have access to personal information will therefore be expected to read and comply with this policy.

#### Purpose

The purpose of this policy is to set out the OPCC commitment and procedures for protecting personal data. Trustees regard the lawful and correct treatment of personal information as very important to successful working, and to maintaining the confidence of those with whom we deal with. We recognise the risks to individuals of identity theft and financial loss if personal data is lost or stolen.

The following are definitions of the terms used:

Data Controller - the trustees who collectively decide what personal information OPCC will hold and how it will be held or used.

Act means the Data Protection Act 1998 and General Data Protection Regulations - the legislation that requires responsible behaviour by those using personal information.

Data Protection Officer – the person responsible for ensuring that OPCC follows its data protection policy and complies with the Act. OPCC is not required to appoint a DPO.

Data Subject – the individual whose personal information is being held or processed by OPCC for example a member, donor or hirer.

Processing – means collecting, amending, handling, storing or disclosing personal information.

Personal Information – information about living individuals that enables them to be identified – e.g. names, addresses, telephone numbers and email addresses. It does not apply to information about organisations, companies and agencies but applies to named persons, such as individual volunteers.

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### The Data Protection Act

This contains 8 principles for processing personal data with which we must comply.

Personal data:

1. Shall be processed fairly and lawfully and, in particular, shall not be processed unless specific conditions are met,
2. Shall be obtained only for one or more of the purposes specified in the Act, and shall not be processed in any manner incompatible with that purpose or those purposes,
3. Shall be adequate, relevant and not excessive in relation to those purpose(s).
4. Shall be accurate and, where necessary, kept up to date,
5. Shall not be kept for longer than is necessary,
6. Shall be processed in accordance with the rights of data subjects under the Act,
7. Shall be kept secure by the Data Controller who takes appropriate technical and other measures to prevent unauthorised or unlawful processing or accidental loss or destruction of, or damage to, personal information,
8. Shall not be transferred to a country or territory outside the European Economic Area unless that country or territory ensures an adequate level of protection for the rights and freedoms of data subjects in relation to the processing of personal information.

### Applying the Data Protection Act within the charity

We will let people know why we are collecting their data, which is for the purpose of managing the cinema, notifying members of films, activities and requesting bookings, informing non-members who sign up to be informed of OPCC film showings and activities, hall hiring and finances. It is our responsibility to ensure the data is only used for this purpose. Access to personal information will be limited to trustees only.

### Correcting data

Individuals have a right to make a Subject Access Request (SAR) to find out whether the charity holds their personal data, where, what it is used for and to have data corrected if it is wrong, to prevent use which is causing them damage or distress, or to stop marketing information being sent to them. Any SAR must be dealt with within 30 days. Steps will first be taken to confirm the identity of the individual before providing information, requiring confirmation of address e.g. recent utility bill, bank or credit card statement.

### Responsibilities

OPCC is the Data Controller under the Act, and is legally responsible for complying with the Act, which means that it determines what purposes personal information held will be used for.

This policy will be updated as necessary to reflect best practice in data management, security and control and to ensure compliance with any changes or amendments made to the Data Protection Act 1998.

In case of any queries or questions in relation to this policy please contact the OPCC Secretary.

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### Procedures for Handling Data & Data Security

OPCC has a duty to ensure that appropriate technical and organisational measures and training are taken to prevent:

Unauthorised or unlawful processing of personal data

Unauthorised disclosure of personal data

Accidental loss of personal data

All trustees must therefore ensure that personal data is dealt with properly no matter how it is collected, recorded or used. This applies whether or not the information is held on paper, in a computer or recorded by some other means e.g. tablet or mobile phone. In the case of OPCC, where personal data is held only on trustee's own PCs and laptops, trustees must therefore ensure that their devices are secured with a suitable password.

Personal data relates to data of living individuals who can be identified from that data and use of that data could cause an individual damage or distress. This does not mean that mentioning someone's name in a document comprises personal data; however, combining various data elements such as a person's name and salary or religious beliefs etc. would be classed as personal data, and falls within the scope of the DPA. It is therefore important that all committee members consider any information (which is not otherwise in the public domain) that can be used to identify an individual as personal data and observe the guidance given below.

### Privacy Notice

*Oxen Park Cinema Club uses personal data for the purposes of managing the cinema, its bookings and finances, running and marketing OPCC related events, and its fundraising activities. Data may be retained for up to 7 years for accounts purposes and for longer where required by the hall's insurers.*

*All personal data processed by OPCC is done so under the lawful basis of managing the cinema club. Consent is therefore not required as long as the data continues to be held or used for the above-stated purposes only.*

*If you would like to find out more about how we use your personal data or want to see a copy of information about you that we hold, please contact the Secretary.*