



Stonehaven Mountaineering and Hillwalking Club

GDPR Policy

Note: where possible, we are able to provide a copy of this policy in more accessible / different formats

Target audience: Members and potential members of Stonehaven Mountaineering and Hillwalking Club (SMHC)

Purpose: To set out SMHC's adherence to the General Data Protection Regulations (GDPR).

1. Data protection principles

The SMHC is committed to processing data in accordance with its responsibilities under the GDPR.

Article 5 of the GDPR requires that personal data shall be:

- a. processed lawfully, fairly and in a transparent manner in relation to individuals;
- b. collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes; further processing for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes shall not be considered to be incompatible with the initial purposes;
- c. adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed;
- d. accurate and, where necessary, kept up to date; every reasonable step must be taken to ensure that personal data that are inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay;
- e. kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed; personal data may be stored for longer periods insofar as the personal data will be processed solely for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes subject to implementation of the appropriate technical and organisational measures required by the GDPR in order to safeguard the rights and freedoms of individuals; and
- f. processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures."

2. General provisions

- a. This policy applies to all personal data processed by the SMHC.
- b. The Committee shall take responsibility for the SMHC's ongoing compliance with this policy.

3. Lawful purposes

- a. All data processed by the SMHC must be done on one of the following lawful bases:
 - i. consent,
 - ii. contract,
 - iii. legal obligation,
 - iv. vital interests,
 - v. public task
 - vi. legitimate interests
- b. The SMHC shall note the appropriate lawful basis in the Register of Systems.
- c. Where consent is relied upon as a lawful basis for processing data, evidence of opt-in



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consent shall be kept with the personal data.

- d. Where communications are sent to individuals based on their consent, the option for the individual to revoke their consent should be clearly available and systems should be in place to ensure such revocation is reflected accurately in the SMHC's systems.
- e. Individuals have the right to access their personal data and any such requests made to the SMHC shall be dealt with in a timely manner.

4. Register of Systems

The following table shows the systems used by the SMHC which contain personal data

System	Format	Owner	Usage	Personal Info	Access level	Lawful Basis
Finance database	Excel	Treasurer	Member payment details (NOT bank details)	Name, Address, Phone, email	Treasurer, Secretary	Consent
Application Forms	Paper	Secretary	Member Details	Name, Address, Phone, email, Next of kin	Secretary	Consent
Emails	Email	Treasurer Secretary	Email	Email addresses	Treasurer Secretary	Consent
Spond	Spond	Outdoor Meets Secretary	Attend Events	Phone numbers	All Members	Consent
Whatsapp	Text Messages	Secretary, Weekend Meet Organisers	Instant communication	Phone	All Members	Consent
Bank Account	Online bank	Treasurer	To allow payments to be made to members	Bank details	Treasurer	Consent

5. Data minimisation

The SMHC shall ensure that personal data are adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed.

6. Accuracy

- a. The SMHC shall take reasonable steps to ensure personal data is accurate.
- b. Where necessary for the lawful basis on which data is processed, steps shall be put in place to ensure that personal data is kept up to date.

7. Archiving / removal

To ensure that personal data is kept for no longer than necessary, the SMHC shall remove



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personal information from their systems once a member notes their decision to leave the Club.

8. Security

- a. The SMHC shall ensure that personal data is stored securely using modern software that is kept-up-to-date.
- b. Access to personal data shall be limited to personnel who need access and appropriate security should be in place to avoid unauthorised sharing of information.
- c. When personal data is deleted this should be done safely such that the data is irrecoverable.
- d. Appropriate back-up and disaster recovery solutions shall be in place.

9. Breach

In the event of a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data, the SMHC shall promptly assess the risk to people's rights and freedoms and if appropriate report this breach to the ICO (Independent Commissioners Office).

10. When is this policy reviewed?

The Committee will review the policy itself at intervals of no less than three years.

Version	Author	Date	Reviewed / Approved
0.1 Draft	Karen Yarnold	May 2023	Reviewed – Roger Owen
1.0	Karen Yarnold		