



AAOCC Privacy Policy

1.1. Scope of the Policy

This policy applies to the work of the AAOCC. The policy sets out the requirement that AAOCC must gather personal data for membership purposes. The policy details how personal data will be gathered, stored and managed in line with data protection principles and the General Data Protection Regulation (GDPR). The policy is reviewed on an ongoing basis by AAOCC Committee members to ensure that AAOCC is compliant. This policy should be read in tandem with AAOCC's Privacy Notice.

1.2. Principles of the Data Protection Regulations

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 the individuals; and
- f) processed in a manner that ensure 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.

Article 5(2) requires that:

“the controller shall be responsible for, and be able to demonstrate, compliance with the principles.”

1.3. This Policy Exists to ensure that AAOCC

- Complies with data protection law and follows good practice
- Protects the rights of members
- Is open about how it stores and processes members data
- Protects itself from the risks of a data breach

1.4 Lawful, fair and transparent data processing

AAOCC requests personal information from members for the purpose of sending communications about their involvement with AAOCC. AAOCC have determined that the lawful basis for holding and processing data on personal members is Legitimate Interest and that AAOCC is a Data Controller. AAOCC have completed a Legitimate Interest Assessment to confirm that this is the lawful basis of processing that is the best fit for our purpose. The forms used to request personal information will contain a privacy notice informing potential members and members as to why the information is being requested and what the information will be used for. The Committee of AAOCC will seek to ensure that member information is not used inappropriately. Appropriate use of information provided by personal members will include:

- Communicating with members about AAOCC events and activities.
- Communicating with members about their membership and/or renewal of their membership of AAOCC.
- Communicating with members about specific issues associated with their membership of AAOCC.

Members of AAOCC will only be asked to provide information that is relevant for membership purposes. This will include:

- Name.
- Postal address.
- Email address.
- Telephone number.

1.5 Accuracy of Data and Keeping Data up to Date

AAOCC has a responsibility to ensure personal members' information is kept up to date. Members will be asked to let AAOCC know if any of their personal information changes.

1.6 Accountability and Governance

The AAOCC Committee is responsible for ensuring that AAOCC remains compliant with data protection requirements and can evidence that it has. The AAOCC Committee shall ensure that new members joining the Committee receive an induction into how data protection is managed within AAOCC and the reasons for this. The Committee will review data protection and who has access to information on a regular basis as well as reviewing what data is held.

1.7 Secure Storage and Processing

AAOCC has assessed that the data held on members by AAOCC is readily available from many other sources and that therefore the harm that could be caused to any individual by loss or theft of the data as held by AAOCC is insignificant.

The AAOCC Committee members have a responsibility to ensure that data is both securely held and processed. In consideration of the risk of harm to individuals caused by unauthorised or unlawful processing or by accidental loss of data as being insignificant; the following will apply:

- Only granting access of personal data of members to those on the Committee who need to communicate with members.
- Using password protection on electronic devices that contain or access personal information.
- Using password protection or secure cloud systems when sharing data between committee members.

1.8 Data Processing by a Third Party

As the AAOCC members are also personal members of ACCEO. AAOCC has entered into a written contractual relationship with ACCEO, for the purposes of direct mailing of their club magazine and any other publications requested by the AAOCC. These terms satisfy GDPR requirements for ACCEO as a Data Processor.