

## **500 Club 50/50 Draw Data Protection Policy**

Bedford Modern School Parents' Association ("BMSPA 500") 500 Club is committed to protecting the privacy and security of personal information. This document provides details about the responsibilities of the BMSPA 500 Club and how we will meet them.

This Data Protection Policy has been approved by, and has the full support of, the BMSPA 500 Committee who are ultimately responsible for compliance with data protection legislation.

The BMSPA 500 Club collects personal data in the course of running the club and in particular for operating a "private society lottery".

### **Policy Statement**

It is the policy of The BMSPA 500 Club that:

- Personal data shall be processed lawfully, fairly and in a transparent manner in relation to individuals;
- Personal data shall be 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;
- Personal data shall be adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed;
- Personal data shall be 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;
- Personal data shall be 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
- Personal data shall be 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

There are further procedures which support this Policy, including the BMSPA 500 Privacy Notice.

## **Personal information we process**

To operate the BMSPA 500 club, we will collect and process information (personal data) about many different people (data subjects). This includes data we receive straight from the person it is about, for example, where they complete forms to become members.

We process personal data in electronic and paper form, and all this data is protected under data protection law. The personal data we process can include information such as names and contact details and financial details.

## **Lawful basis for processing**

The BMSPA 500 club will determine and document the lawful basis before processing any personal data. The lawful basis will be one of the following:

**(a) Consent:** the individual has given clear consent for an organisation to process their personal data for a specific purpose.

**(b) Contract:** the processing is necessary for a contract you have with the individual, or because they have asked you to take specific steps before entering into a contract.

**(c) Legal obligation:** the processing is necessary for you to comply with the law (not including contractual obligations).

**(d) Vital interests:** the processing is necessary to protect someone's life.

**(e) Public task:** the processing is necessary for you to perform a task in the public interest or for your official functions, and the task or function has a clear basis in law.

**(f) Legitimate interests:** the processing is necessary for your legitimate interests or the legitimate interests of a third party unless there is a good reason to protect the individual's personal data which overrides those legitimate interests.

The BMSPA 500 club's privacy notices will include the lawful basis for processing as well as the purposes of the processing.

When asking individuals to provide personal information, the BMSPA 500 club shall be identified as the data controller.

All forms used to collect personal data must clearly state the purpose for which the information is being collected or refer to the appropriate privacy notice where the purpose of the processing is set out.

The BMSPA 500 club will not use personal data for any purposes other than those advised to individuals directly or those listed in the privacy notices.

The BMSPA 500 club will not disclose personal data to third parties unless:

- required to by law
- set out in the BMSPA 500 club privacy notice
- there is an information sharing agreement in place to ensure that any processing by the third party will be within the law
- it is necessary in order to fulfil a legitimate purpose that has been advised to the data subject.

### **Personal data quality**

All forms used to collect personal data shall only ask for information which is relevant to the purpose of the form.

Changes in personal data must be promptly and accurately updated on the database.

### **Subject access**

The General Data Protection Regulation provides for a right enjoyed by all individuals to know what personal data about them is being held and used by organisations and broadly for what purpose, where it came from, and who else might receive it. This is subject to certain limitations and exemptions.

Personal data will only be disclosed to the data subject when:

- the subject access request (SAR) is made in writing - it does not have to mention GDPR but it should be clear that the requester wishes to access information about themselves, and
- the authenticity of the individual making the request has been confirmed (by requesting any information that is reasonably required to confirm the identity of the requestor).

All responses to a SAR should be made within a calendar month, starting with the date on which the SAR is received.

### **Personal data retention**

Personal data will not be kept for longer than is necessary for the purposes that it was collected for.

### **Security of personal data**

We will use appropriate measure to keep personal data secure at all points of the processing. Keeping data secure includes protecting it from unauthorised our unlawful processing, or from accidental loss, destruction or damage.

The data will be stored on Password Protected Databases and accessible by officers of the club only. The Database will be reviewed on an annual basis.

### **Data protection breaches**

Any known or suspected data breaches should be reported to the Secretary if they are 'likely to result in a risk' to the data subject(s) and/or are 'likely to harm individuals'. This will enable the BMSPA 500 Club to make the appropriate reports to the Information Commissioners Office (ICO) within 72 hours of

becoming aware of a data breach and, where necessary, to inform the affected individuals too.

## **Governance**

The data protection policy will be reviewed on an annual basis.

A copy of this BMSPA 500 Data Protection Policy may be found on the website. Should you have any queries about this policy, please contact the 500 Club Secretary: [bmspa-draw@bedmod.co.uk](mailto:bmspa-draw@bedmod.co.uk)