

Data Protection Policy

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Definitions

Charity	means Mansfield and Sutton Astronomical Society, a registered charity
GDPR	means the General Data Protection Regulation
Responsible Person	means the Charity's IT Coordinator, currently Paul Sherratt
Register of Systems	means a register of all systems or contexts in which personal data is processed by the Charity

1. Data Protection Principles

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

Article 5 of the GDPR requires that personal data 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 Charity.
- b. The Responsible Person shall take responsibility for the Charity's ongoing compliance with this policy.
- c. This policy shall be reviewed at least annually.
- d. The Charity shall register with the Information Commissioner's Office as an organisation that processes personal data.

3. Lawful, fair and transparent processing

- a. To ensure its processing of data is lawful, fair and transparent, the Charity shall maintain a Register of Systems.
- b. The Register of Systems shall be reviewed at least annually.
- c. Individuals have the right to access their personal data and any such requests made to the charity shall be dealt with in a timely manner.

4. Lawful purposes

- a. All data processed by the charity must be done on one of the following lawful bases: consent, contract, legal obligation, vital interests, public task or legitimate interests ([see ICO guidance for more information](#)).
- b. The Charity 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 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 Charity's systems.

5. Data minimisation

- a. The Charity shall ensure that personal data are adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed.
- b. Any personal data no longer of legitimate use to the Society will be deleted within 90 days of the end of the financial year.

6. Accuracy

- a. The Charity 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.
- c. If your personal data changes (for example you move house or change email address) you should inform the Secretary in writing of the change.

7. Archiving / removal

- a. To ensure that personal data is kept for no longer than necessary, the Charity shall put in place an archiving policy for each area in which personal data is processed and review this process annually.
- b. The archiving policy shall consider what data should/must be retained, for how long, and why.

8. Security

- a. The Charity 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 members of the committee. Two-factor authentication is in place to protect access to this data and appropriate security is 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 Charity shall promptly assess the risk to people's rights and freedoms and if appropriate report this breach to the ICO ([more information on the ICO website](#)).

Questions answered about your data

As a Registered Charity, Mansfield and Sutton Astronomical Society is duty bound to collect and maintain personal information in order to administer the affairs of the Society.

The Society will operate in accordance with the provisions of The General Data Protection Regulation 2016/679 and the Data Protection Act 2018 and uphold The Data Protection Principles set out in these acts.

This means that personal data shall be

- a) processed lawfully, fairly and in a transparent manner in relation to individuals ('lawfulness, fairness and transparency');
- 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 ('purpose limitation');
- c) adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed ('data minimisation');
- 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 ('accuracy');
- 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 ('storage limitation');

- 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 ('integrity and confidentiality').

What personal data does the Society collect?

- For members of the Society we will collect your name, postal address, and telephone number.
- For junior members we will collect your name, date of birth and postal address.
- We may collect other contact information (for example e-mail addresses) if you wish to provide this data.
- As a result of your membership of the Society other personal data will be generated; this will include records of payments made by you to the Society and, if you are a swipe card holder and/or authorised telescope user, your activation of door access and use of telescope.
- If you visit the Society we will collect your name and the reason for your visit. We may also collect the area where you have travelled from and how you heard of us/the event you are attending.

Why does the Society collect this data?

- We have to collect a minimum amount of information to maintain membership records and to enable us to send notices (for example of the Annual General Meeting) to members as we are legally bound to do.
- The Society needs to record information on the number of visitors and the areas they live; this is for the use of funders who monitor the number of visitors benefiting from certain awards made.
- To allow the Society to monitor the effectiveness of public outreach advertising.
- The Society will not use your personal data for the purposes of direct marketing or for any automated decision-making.

Will the Society disclose personal data to anyone else?

- The Society will only disclose personal data:
 - To other members of the Society - but only if we have your permission to do so.
 - Where we are obliged to do so by law or are directed to do so by the Courts.

How can I see the personal data the Society holds about me?

- You should write to the Secretary asking for a copy of the personal data the Society holds about you. You should state clearly if you wish to see a record of payments.

Can I object to my personal data being processed?

- Yes, you can object to personal data being processed if you believe that such processing would, in the words of the Act, cause substantial damage or distress to you or another individual. In practical terms, the data held by the Society is the minimum for workable administration. If you object you should do so, in writing, to the Secretary stating what damage or distress would be caused and to whom. We have 21 days to respond, either to comply with your request or to state why the request is unreasonable or unjustified.