



Royston Arts Society Data Protection Privacy Notice

Definitions

RAS	means Royston Arts Society a not-for-profit organisation
GDPR	means the General Data Protection Regulation.
RASC	means the Royston Arts Society Committee
Register of Systems	means a register of all systems or contexts in which personal data is processed by RAS.
Responsible Person	means the RAS Secretary who is the person voluntarily dealing with Data Protection issues on behalf of RAS

1. RAS background

RAS is a not-for-profit organisation run entirely by the RASC, comprising volunteers who are unpaid in any shape or form except where they are reimbursed for expenses necessarily incurred.

A copy of the RAS Constitution setting out its aims can be found on our website under 'Key Documents' on the drop down top menu entry for 'About Us' or click [HERE](#).

RAS does not have any premises.

RAS does not possess any IT equipment of any description and does not supply or otherwise provide IT equipment to RASC members.

RAS does not possess any telephonic equipment.

RAS does not possess a structured filing system where hard copies of documents are stored.

It follows that RASC members use their own personal IT, telephonic equipment, computer software and filing systems for hard copies in the course of their work on behalf of RAS. RASC members will have exercised their own choice in respect of equipment used and security measures applied prior to joining RASC. RAS does not necessarily possess any IT expertise and does not provide advice on technical security measures to be used in conjunction with personal IT equipment though it does expect RASC members to apply common-sense measures. Instead RAS relies on operational measures to ensure that personal data in digital and hard copy form are processed and stored in a secure manner as prescribed at various points in this document.

2. Distinction between personal data acquired for 'personal' or 'Organisational' use

Typically RASC members are local people and often have contact on a personal level with other RAS members and non-members who are involved with RAS. RASC members might also be members of other groups and societies. Consequently, there can be a certain amount of overlap

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between personal data held for personal reasons and personal data relating to the work of RAS. The former is excluded under Article 2.2(c) of REGULATION (EU) 2016/679, the 'General Data Protection Regulation' (GDPR) which states that "This Regulation does not apply to the processing of personal data by a natural person in the course of a purely personal or household activity;". The latter comes within the scope of the GDPR.

There may be a point at which it becomes clear that informal discussions between individuals and/or organisations relating to activities of RAS have moved beyond the stage of personal communications and now fall within the sphere of activity encompassed by RAS. At that point RAS holds the personal data for an individual acting either on behalf of themselves or another organisation, RAS will assume the responsibilities of a Data Controller with regard to those personal data.

This will occur when, for example:

- An individual becomes a member of RAS;
- An individual or organisation contracts to supply goods or services to RAS;
- An individual formally opts-in to receive communications from RAS regarding events and activities that non-members can participate in;
- An individual opts-in to receive notifications from the RAS website.

3. Nature of compliance with GDPR

Every reasonable effort, proportionate to the nature and activities of RAS as described above, will be made to comply with the GDPR and the recommendations of the body responsible for enforcement within the UK, i.e. the Information Commissioner's Office. This may mean that some recommendations which are more appropriate for commercial or larger organisations will necessarily be dealt with in a reactive manner rather than by taking pre-emptive measures or putting in place procedures that impose unrealistic or burdensome expectations on RAS.

RAS's lawful reasons for collecting personal data are twofold:

a) **Contract** – RAS will enter into contract with subscribing members of RAS, and in these circumstances will use the lawful reason of 'contract' to justify any necessary processing of personal data. This is also the lawful reason when entering into contracts with contractors such as artists providing art demonstrations, sponsors and those providing goods and services to RAS.

RAS will keep clear records to demonstrate that 'contract' is a lawful reason for such processing and will continue to review its current processes and documents to ensure that lawful compliance is achieved.

b) **Consent** - RAS will always seek clear unambiguous 'opt-in' consent when requesting personal data from those requesting news of forthcoming events and/or activities arranged by RAS. This consent will not use pre-ticked opt-in boxes and it will be kept separate from other terms and conditions. The 'opt-in' process will make clear what type of communication the individual is opting to receive from RAS.

RAS will keep clear records to demonstrate such 'consent' and will continue to review its processes and documents to ensure that lawful compliance is achieved.

4. RAS asks for personal data in six circumstances:-

a) to maintain membership records for subscribing RAS members;

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- b) to manage entry applications from RAS members and non-members for exhibitions and competitions;
- c) to supply information about forthcoming RAS exhibitions and similar activities as requested by data subjects;
- d) when individuals sign up to request that they be sent notifications of new posts on RAS website;
- e) for contractual reasons when engaging artists, sponsors, or other contractors for RAS activities;
- f) for record-keeping and communications purposes in relation to competition judges and other volunteers;

5. How we collect and store your personal data

a) Membership records - RAS maintains an electronic database of subscribing members. The personal data recorded for each member are supplied annually on a membership application/renewal form and consist of name and contact details. Hard copies of these forms are retained for a period of five years. In addition, when a member opts to pay subscription fees online, using either BACS or another third-party agent such as PayPal, RAS will record such of the member's financial account details as are required to process the payment method chosen. The names of members (but not their contact or financial details) are shared with the RAS insurer and with other organisations who offer discounts to RAS members. These data are retained until the individual ceases to be a member of RAS. At this point the data are deleted unless the individual opts in to receive information on activities that are available to non-members.

b) Exhibition and competition entries - RAS maintains an electronic database of members and non-members submitting entries to its exhibitions and competitions. The personal data recorded for each exhibitor are supplied on an entry form specific to each exhibition/competition and consists of name and contact details and, where the competition is age-related, the date of birth of the entrant.

Information about exhibitors may be shared with a third party, such as the management of an exhibition venue, solely for the purpose of managing the exhibition or competition. Where this occurs, it is clearly stated on the terms and conditions on the entry form.

Hard copies of the exhibition entry forms are destroyed within 6 months of the end of the exhibition.

c) Information about forthcoming activities - RAS maintains a database of non-members (including exhibitors, purchasers of paintings at its exhibitions, and guests invited to RAS functions) who have explicitly asked to receive information about forthcoming activities. The personal data recorded for each such individual consist of name and contact details. These records are retained for five years after the last such recorded activity.

d) Website - The RAS website provides a means by which an individual can download membership applications and exhibition/competition entry forms. Whenever contact is made with an RASC member using a website email contact form, a copy is retained on the website. Whenever an individual opts in to receive RAS's posts on the website their email address (but not their name) is stored on the website.

The website administrator takes backup copies of the website on a regular basis and these are stored on a USB memory stick kept exclusively for that purpose by the website administrator in a safe place. Before being deleted, these backup copies are stored for an appropriate length of time at the discretion of the website administrator in relation to the perceived need to keep earlier versions of the website.

e) for contractual reasons when engaging artists or other contractors for RAS activities.

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RAS keeps records of the contracts it enters into either in a paper form and/or an electronic form. These records are kept for seven years.

f) for record-keeping and communications purposes in relation to competition judges and other volunteers. Records of other agreements are kept in a paper form and/or an electronic form. These records are kept for seven years.

RAS's Database - the data listed in "a" to "c" above are stored on a database created using Microsoft Access. This has a password and is encrypted. This database is used by RASC members on their personal computers. It is also stored on Dropbox and backed up on a USB stick and an external hard drive.

Other data relate to accounts, invoices received, consents to receive RAS communications and entries to competitions use Google sheets. These are stored on Google Drive and accessed using the RASC member's personal computers.

Website hosting services - are provided by LCN.com which is based in Stevenage and upon request has provided assurances that the services they provide under their terms and conditions <https://www.lcn.com/terms> are compliant with the GDPR. LCN.com has also confirmed that they do not process data outside of the UK.

RAS uses a standard WordPress service to collect anonymous information about users' activity on RAS's website, for example the number of users viewing pages on the site, to monitor and report on the effectiveness of the sites and help us improve them.

RAS does not use Google Analytics or 'cookies' on its website.

Email - Is used in the collection of personal data in the circumstances described in 4a), 4b) and 4c), for general communications purposes and also to facilitate the collection of data in the remaining three circumstances. Email addresses may be stored in the individual address books used by each and any of the official @roystonarts.org accounts and/or in the personal email accounts of individual members of RASC.

RASC members will use the 'blind copy' feature when emailing more than one recipient in order to avoid revealing email addresses to other recipients, except when it is absolutely clear that recipients' email addresses are already known to each other, or, where there is a clear need to know for a common purpose. This usually occurs when RASC members are communicating with each other.

The official @roystonarts.org accounts are provided to RAS by LCN.com as part of the hosting services. The personal email accounts used by the RASC members involve other email services.

Hard copy - is used in relation to 4a, 4b, 4e and 4f. Hard copies are kept in a safe place in the homes of the RASC member preferably under lock and key. Such hard copies may be viewed by other RASC members in the course of meetings involving decision-making.

Cloud Storage Systems – RAS currently uses cloud storage technology provided by both Dropbox and Google Drive to store information relating to its activities.

Dropbox and Google are both incorporated in the United States and both state compliance with the 'EU – US Privacy Shield' – a mechanism for transferring data between Europe and the United States. (A link to the official website containing details of the Privacy Shield is provided here <https://www.privacyshield.gov/welcome>).

Information relating to how Google complies with the Privacy Shield and how it deals with Security, Privacy and Compliance issues, including GDPR, can both be found by following this link: <https://cloud.google.com/security/compliance/eu-data-protection-directive/>

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Information relating to data transfers between Europe and the United States and how they are handled by Dropbox can be found by following the link below <https://www.dropbox.com/help/security/data-transfers-europe-us> and their approach to compliance with GDPR can be found here <https://www.dropbox.com/security/GDPR>

6. Access to personal data

RAS tries to be as open as possible in terms of giving people access to their personal data. Individuals can find out if any personal data are held by making a 'subject access request' which should be addressed in writing or by email to the RAS Secretary, 81a Frog End, Shepreth, Royston SG8 6RF; secretary@roystonarts.org.uk.

Anyone making a subject access request should be aware that RAS does not normally acquire personal data from anyone except the owner of that data. It is therefore expected that anyone making a subject access request indicates why they think personal data may be held by RAS.

If RAS does hold your personal data the Responsible Person will give you a description of them; tell you why they are being held; tell you who they could be disclosed to, and let you have a copy of the information in an intelligible form. You can also ask the Responsible Person to correct any perceived errors in those data or remove them from electronic or paper filing systems altogether.

RAS does not sell, disclose or otherwise disseminate personal data to any other organisation or individual without first seeking permission from the data owner. Other organisations are asked to store such data on behalf of RAS as described at various points in this document.

7. Archiving policy

RAS retains data only on the terms described above and for the periods of time described above.

8. Complaints or queries

RAS tries to meet the highest standards possible when collecting and using personal data proportionate to its nature and activities as described at various points in this document. Any complaints received will be taken very seriously and individuals or organisations are actively encouraged to draw attention to any collection or use of personal data that is thought to be unfair, misleading or inappropriate and suggestions for improvement will be seriously considered.

RAS is happy to provide any additional information or explanation needed in respect of its Data Protection policies and any such requests, complaints or suggestions should be sent to the RAS Secretary, 81a Frog End, Shepreth, Royston SG8 6RF.

9. Links to other websites

This privacy notice does not cover the links within the RAS's website site linking to other websites. Individuals are encouraged to read the privacy statements on the other websites visited.

10. Circulation of Data Protection material

All RASC members are required to read this document and the accompanying 'Royston Arts Society Data Protection Policy Statement' which can also be found on the 'Key Documents' page on the Royston Arts Society website.

END OF DOCUMENT

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