

## **SURREY TREE WARDEN NETWORK DATA PROTECTION POLICY**

This Policy sets out how Surrey Tree Warden Network (“STWN”) will gather, store and manage personal information of members. “Personal information” means information which could identify an individual, or is related to the identity of an individual.

STWN will deal with personal information in line with general data protection principles and, specifically, in line with the General Data Protection Regulation (“GDPR”). STWN will seek to ensure that it protects the data protection and data privacy rights of its members, is open about its procedures for storage and processing of personal information and protects itself from data breach.

The policy will be regularly reviewed by the STWN committee, in order to ensure that STWN remains in compliance with GDPR, relevant data protection law and good practice.

### **DATA PROTECTION PRINCIPLES**

The GDPR identifies eight data protection principles:

- 1 Personal data shall be processed lawfully, fairly and in a transparent manner.
- 2 Personal data may be collected only for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes.
- 3 The collection of personal data must be adequate, relevant and limited to what is necessary, having regard to the purposes for which the data is collected.
- 4 Personal data held should be accurate and, where necessary, kept up to date. Reasonable endeavours should be made to remove/rectify inaccurate data as quickly as practicable.
- 5 Personal data which is kept in a way which enables identification of individuals should not be retained for longer than reasonably necessary.
- 6 Personal data must be processed in accordance with individuals’ rights.
- 7 Personal data must be processed in a way that ensures, by appropriate technical or organisational means, appropriate protection of the personal data, including protection against accidental loss or destruction and unauthorised processing.
- 8 Personal data may not be transferred outside the European Union to a country or territory which lacks an adequate level of protection for the rights and freedoms of individuals as to the processing of personal data.

### **GENERAL GUIDELINES FOR STWN COMMITTEE MEMBERS**

Only those who need to communicate with members will be able to access data covered by this policy. Data should not be shared informally or outside STWN.

STWN committee members should keep all data reasonably secure and take reasonable precautions in this respect *e.g.* by the use of strong passwords, which should not be shared.

Personal information should not be shared outside STWN, without consent, save as required by law.

Member information should be reviewed and updated periodically, or when this policy is materially amended.

### **LAWFUL AND CLEAR DATA PROCESSING**

STWN requests personal data from members and potential members so that STWN may communicate with them about their involvement with STWN. When STWN requests personal data, the requests will contain a privacy statement stating why the information is requested and how the information will be used and members will be asked to consent to their data being held. STWN will keep securely a record of the member information and the member consent.

STWN members will be informed that they may at any time withdraw their consent and whom they should contact if they wish to do so. In that event, STWN will action the request promptly and the STWN member will be informed when this has been done.

The STWN committee will seek to ensure at all times that member personal data is not used inappropriately, or in a manner which infringes the rights of an individual member.

### **RELEVANT DATA PROCESSING**

STWN members will be asked to provide only information that is relevant for membership purposes, including title, name, address, email address, telephone number(s) and, if applicable, the council or other body which the member represents.

If additional information is required, STWN will seek the consent of the member, informing the member why the information is required and how the additional information will be used.

There may be occasions when STWN needs to share a members' personal data with a third party e.g. in the event of an accident or injury, or if required by law. In such cases, where STWN reasonably considers it to be in the best interests of the member or of STWN, then consent of the member is not required.

### **ACCURACY AND UPDATING YOUR PERSONAL INFORMATION**

STWN will seek to keep members' information up to date. STWN will request members to inform the Membership Secretary of any changes in their personal information, or of any errors in their personal information held by STWN of which a member becomes aware.

### **RESPONSIBILITY**

The STWN committee is responsible for ensuring that STWN remains compliant with data protection legal requirements and can show such compliance.

Specifically, the STWN Committee is responsible for ensuring that personal data is reasonably securely held and processed, including e.g. committee members using strong passwords and not sharing passwords, restricting access to member personal information to those committee members who need it and using appropriate password protection on computers

## **DATA ACCESS REQUESTS**

STWN members may request details of their personal information that is held by STWN. Such requests should be sent in writing, including email, to the Membership Secretary. Unless there are exceptional circumstances, the Membership Secretary would expect to provide the requested information within 21 days of receiving the request. The Membership Secretary will keep a record of the date the request is received and the date of the response.

## **DATA BREACH**

If a data breach occurs, STWN will seek to minimise harm occurring by ensuring as quickly as practicable that all STWN committee members are made aware of the breach and how the breach occurred.

The Membership Secretary will contact affected members, informing them of the breach and action taken to remedy the breach.

## **CHANGES TO AND COPIES OF THIS POLICY**

If you require a copy of this policy, please contact the Secretary

## **QUERIES OR COMPLAINTS**

Any questions about this policy, or any complaint about our data protection practice, should be sent in writing to the Secretary, who will arrange for the question/complaint to be considered by the STWN committee.

*[DATE]*