

# Cornwall Astronomy Society - General Data Protection (GDPR) Policy

## 1 Policy Statement

This document outlines how Cornwall Astronomy Society (CAS) complies with the General Data Protections Regulation (GDPR) when conducting its business. GDPR sets out seven key principles when collecting, processing and holding data, namely:

- Lawfulness, fairness and transparency;
- Purpose limitation;
- Data minimisation;
- Accuracy;
- Storage limitation;
- Integrity and confidentiality (security)
- Accountability.

This policy will mention the following: Data subjects, personal data, data controllers and data processors. Where these are mentioned the terms are defined as:

Data Subject: a natural person whose personal data is processed by a data controller or data processor.

Personal data: any information related to a natural person or 'Data Subject' that can be used to directly or indirectly identify the person.

Data controller: the entity that determines the purpose, conditions and means of the processing of personal data.

Data processor: the entity that processes data on behalf of the Data Controller.

## 2 Data subjects' rights

### 2.1 Personal data shall be processed lawfully, fairly and in a transparent manner in relation to individuals.

When collecting, processing and holding personal data, CAS will always identify the lawful basis for processing the data.

Where data is collected by CAS, either as data controller or data processor, CAS will ensure that data is always collected and processed with informed consent of the individual, that data is processed lawfully and fairly and in a transparent manner.

In detail, CAS will ensure that individuals are fully informed as to how their data will be used prior to providing data in order to give informed consent. Individuals' consent will be collected using positive action, e.g. by verbal response, opt-in sign up or written response (electronically or hard copy).

Data is not processed in any way which is incompatible with the information given when the data subject gave their informed consent. Where we ask data subjects for sensitive data – defined by the GDPR as race, ethnic, origin, politics, religion, trade union membership, genetics, biometrics (where used for ID purposes), health, sexual orientation or sex life – CAS condition for processing sensitive data is the data subject giving explicit informed consent to the processing of those personal data for one or more specified purposes. We will only collect this type of data where necessary and data impact assessments will be established to ensure the purpose of the collection.

Where personal data has been shared with CAS by a third party, we will ensure that there is a lawful basis for processing such data. Lawful basis is most likely to be 'legitimate interest'.

CAS will be transparent in their collections, processing and holding of personal data. During any operations of society business, data subjects are informed on the following:

- Informed about who CAS are, how they can be contacted;
- Why personal data is collected as part of the society's business;
- How the data subjects' personal or sensitive personal data will be used.

CAS will not keep personal data for longer than is necessary and only for the purpose which the data was collected for. As a minimum CAS will review whether it is necessary to keep any personal data for a period of time (e.g. 12 months) after the data is collected and delete any personal data which is not necessary to keep. An expiry and destroy date is always logged for any retained personal data.

CAS will not share any personal data with third parties without prior and explicit consent from the data subject unless under legal obligation to do so.

Data subjects have the right to lodge a complaint with the data controller using CAS' contact details, or if they are still not satisfied, the Information Commissioners Office should they wish, using the helpline 0303 123 1113.

## 2.2 The right of access

Data subjects have the right to request access to any information which CAS hold about them if it is linked to their personal data in anyway. If CAS receives such a request of access to data, it is CAS's policy to record the request, respond with an acknowledgement within 48 hours and provide the data to the individual within 30 days from the date of the initial request in accordance with GDPR guidelines. If data which is held is no longer personally identifiable in any way, the data subject is informed thus.

## 2.3 The right to rectification

Data subjects have the right for their data to be rectified if they believe it is inaccurate or incomplete. If CAS receives a request to rectify personal data from an individual which we hold data about, it is our policy to record the request, respond to that request within 48 hours in acknowledgement and within 30 days will make the rectification or completion as requested following GDPR guidelines.

## 2.4 The right to erasure, the right to object and the right to restrict processing

Data subjects have the right to object to the processing of their data and withdraw consent to their data being processed at any point. This can include asking CAS to erase any personal data which we hold, restrict processing of that personal data or object to a type of processing which CAS is undertaking. Data subjects are given information of how to withdraw their consent or request restricted processing or erasure. All information on contacting CAS for this purpose are also published on the CAS web site.

CAS will record any request for erasure, objection or restricted processing and respond within 48 hours in acknowledgement and within two weeks to carry out the request.

## 2.5 Personal data shall be collected for specified, explicit and legitimate purposes and not further processes in a manner that is incompatible with those purposes.

CAS will always specify in an explicit and transparent manner the reason data subjects' personal or personally sensitive data is being processed. Any data is not processed further in any way which is incompatible with those purposes without the explicit informed consent of the data subject.

## 2.6 Personal data shall be adequate, relevant and limited to what is necessary in relation to the purpose for which they are processed.

CAS will only collect data which is necessary for individual and specific or lawful or legitimate purposes, either as part of running our membership based society.

Where we collect sensitive data, data subjects are told why it is necessary to collect this data and given the option to answer or not to answer the request.

Personal data is not kept for longer than necessary and securely deleted at the earliest possible point (see section Error: Reference source not found.)

## 2.7 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 purpose for which they are processed, are erased or rectified without delay.

All data subjects are informed that they have the right to their data being rectified if they believe it to be inaccurate or incomplete. If we receive a request to rectify personal data, it is CAS' policy to respond to that request within 48 hours in acknowledgement and the rectifications to be made within 30 days of the initial request received. Information on how to contact CAS is given to data subjects directly and can also be found on our web site.

## 2.8 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.

CAS does not keep personal data longer than is necessary and will delete personal data at the earliest possible point, unless instructed differently data subjects or law enforcement. All collected personal data should be reviewed at least 12 months after collection and necessity of further storage or secure deletion assessed at this point.

## 2.9 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.

CAS uses a selection of IT equipment, software and applications to undertake its activities, including processing of data, personal data and sensitive personal data. To ensure that the data processing is secure and personal data is protected against unauthorised or unlawful processing and/or against accidental loss, destruction or damage, we will only work with suppliers which demonstrate full compliance with GDPR (e.g. Microsoft or Apple Mac). We will be happy to provide further and in-depth details on all of them if necessary.

CAS takes cyber security very seriously, and as this policy outlines our commitment and compliance with the GDPR.

### 3 Transferring of personal data

CAS will transfer personal data only if absolutely necessary and will ensure that files are password protected during transfer. If possible, secure data transfer portals will be used (e.g. Egress Switch Secure Email and File Transfer).

CAS will not share personal data with a third party and undertakes relevant checks to ensure that third parties comply with the GDPR if providing data. The only exception are as outlined in the GDPR for compliance with legal obligations.

### 4 Policy Compliance

If any party is found to have breached this policy, it is seen as cross mis-conduct and the person will be excluded from CAS membership. If a criminal offence is considered to have been committed further action may be taken to assist in the prosecution of the offender(s).

*If you do not understand the implications of this policy or how it may apply to you, seek advice from the CAS committee.*

### 5 References

The following CAS policy documents are directly relevant to this policy, and are referenced within this document:

- Privacy Policy.
- Data Protection Policy.

### 6 Authorisation, Approval and Review Dates

This Policy will be subject to review annually.

### 7 Contacts

If you have any questions in regards to this or other policies please contact CAS via [info@CornwallAS.org.uk](mailto:info@CornwallAS.org.uk).