

## Nicholson 31 Owners Association

### DATA MANAGEMENT POLICY

Data held by the Nicholson 31 Owners Association (the Association) is controlled according to the principles laid down in the General Data Protection Regulations (2018) (GDPR). There are requirements that information is gained, maintained and deleted under specific and transparent processes.

#### 1) Purpose:

- Personal data is used for the operation of the Association
- Photographs and videos may be used on the Associations website and social media pages
- Personal data may be shared with other members of the Association
- Anecdotal evidence regarding the history of the Nicholson 31 fleet of yachts will be maintained for historical purposes.

#### 2) Information sources:

- Personal data will be gained from membership application forms and data shared with the Association by a member or former member.
- Personal data may be gained from third parties requesting assistance and support, or wishing to place an advertisement in the 'Boat for Sale' section of the website
- Anecdotal evidence regarding the history of the Nicholson 31 fleet of yachts may be updated for historical purposes.

#### 3) Data entry:

1. Applications for membership of the Association will be received by the Honorary Secretary (Hon. Sec.).
2. Hon Sec will forward details to the Honorary Treasurer (Hon. Tres.) and Honorary Webmaster (Hon. Web.).
3. Hon. Tres. confirms to Hon. Sec. **when** fees are paid.
4. Hon. Web includes details on **website** membership list and the Nicholson 31 Association Forum (Forum) list.
5. Hon. Web. issues passwords for website and Forum.
6. Hon. Sec. enters details onto **members list held electronically.**
7. Details of 'Boats for Sale' received by Hon. Web.

8. **If such details are from non - members then contact** information passed to Hon. Tres. for payment of fees.
9. Hon. Web. includes **on the website agreed details of boat for sale and contact information.**
10. Hon. Web. copies such details **and information to** Hon. Sec. for the Association's records.

**4) Data audit:**

1. All digital records will be audited annually by the Honorary Secretary, Honorary Treasurer and Honorary Webmaster **prior to the Annual General Meeting.**
2. Hon. Sec. will issue the current membership list to the Hon. Tres. for checking of **fees paid.**
3. Hon. Tres. will confirm to the Hon. Sec. the members details on the list are correct and note any alterations that are required.
4. Hon. Sec. then forwards the corrected list to Hon. Web. to amend/modify members list on the website and Forum as necessary.
5. Hon. Web. amends **website list** as required; any alterations recorded via screenshot.
6. Hon. Web. will audit Boats for Sale list **at the same time as the annual audit.** Details will be amended as required, any alterations or deletions confirmed with Hon. Sec. and recorded via screenshot.

**5) Updating/alteration of data:**

1. The Process for Data Alteration/Removal will be posted on the website page 'Data Protection Policy'.
2. All requests for the alteration or removal of personal data held by the Association must, in the first instance, be made by the person or their bona fide representative to the Hon. Sec. either by email or post.
3. Any alterations will be notified by the Hon. Sec. to the Hon. Web. who will take the requisite action and report back to the Hon Sec.
4. The Hon. Sec. will communicate with the individual requesting change to confirm that the alteration has been completed

5. If a lapsed member has contributed to the Forum their contributions will remain visible unless a specific request for deletion is made (Lapsed Forum members are only identifiable by a user name)
6. Any addition, alteration or removal of data on the website and Forum not covered by audit proceedings or specific request must be approved by the Hon. Sec. before the action takes place. Details to be recorded and retained by Hon. Sec.

**6) Security:**

1. The Hon. Sec. will be responsible for the security of records involving the management and processes of the Association. Files to be stored on removable media and in a specific Nicholson 31 Association Dropbox account.
2. The Hon. Tres. will be responsible for the security of records involving the finances of the Association. Files to be stored on removable media and in a specific Nicholson 31 Association Dropbox account.
3. The Hon. Web. will be responsible for the security of files involving the website and Forum of the Association. Files to be stored on removable media with a copy available for reloading of the site and Forum if required.
4. If the Hon. Sec., Hon. Tres. or Hon. Web. become aware of any breaches of data security or virus infection on the computers used to process Association information they will take immediate action to inform the other parties.
5. The Hon. Web. will have responsibility to protect the website and Forum codes from data breaches or virus infection.
6. Any breaches of data security on either the website or Forum will be investigated by the Hon. Web. in conjunction with the current Site Host.
7. The Association has a duty to inform members of any data breach. This action will be performed by the Hon. Sec. once the nature of the breach has been identified by the Hon. Web. The Association members will be updated as the investigation proceeds, until a clear message indicating that any problems are fully resolved can be issued.
8. Any communications between Committee members and any third parties regarding a breach will be recorded electronically as copies of emails or as notes of telephone communications. A summary of any actions taken will be prepared by the Hon. Web. at the completion of the action.

**7) Other actions:**

1. The Data Privacy Policy displayed on the website page 'Data Protection Policy' will be the policy currently in force.
2. Amendments to the Data Privacy Policy will be posted on direction of the Hon. Sec., with the agreement of Hon. Tres. and Hon. Web. Latest amendment will be printed in bold in the appropriate area of the policy, with a clear indication of the date of the amendment.
3. Details of any amendments to the Data Privacy Policy will be published in the next available Newsletter.
4. Copies of deactivated membership data and any data removed on request of members and non-members will be archived in a clearly marked folder. Date of disposal will be clearly marked on the folder. Archived data will be held for a maximum period of six years in recognition of Association liability and legal obligation
5. The agreed Data Management Policy will be available as a PDF on request to members and non-members.
6. The agreed Process for Data Alteration/Removal will be included as a PDF attachment to any non-member who supplies personal data to the Association.

**8) General information to be included on Honorary Secretary's outgoing email footer:**

**You are receiving this email because you are a member of the Nicholson 31 Association or have shown an interest in this Association.**

**General Data Protection Regulations (GDPR)**

A full version of the Policy can be found on [www.nicholson31.com](http://www.nicholson31.com). PDF can be sent on request.

Information I receive from you may include sensitive personal data about you and your issue/question. The types of information will probably include your name, address and contact information. The contact data you provide will be retained by me in accordance with the provisions of the General Data Protection Regulations and related legislation.

Sensitive personal data remains confidential and will not be used or released by me except in order to deal with your issue(s)/question(s) when contacting others. I will use the data collected for the following purposes: (i) to respond to you and assist you with your issue or question; (ii) to keep you updated on this issue and the wider subject matter in the future. Your data will not be sold or given to anyone.

**If you do not want the contact information you give to me to be used in these ways, please e-mail back and state this.**