

Data Protection

BAFSAM Policy & Procedures statement

All articles referred to in this document refer to the General Data Protection Regulation (GDPR).

1. BAFSAM processes personal data relating to its members and associates under 'Consent' (Article 6(a)).
2. The data held consists mainly of company details (postal addresses, telephone numbers and email addresses). The names of a limited number of individual contacts for each organisation are held. In a limited number of cases, the company details may equate to the personal data of the contacts (e.g. home addresses, telephone numbers, personal mobile numbers and email addresses). (Article 4(a))
3. Additional information may be required for BAFSAM Council members to share with Companies House and the company bank for legal reasons (Article 6(c))
4. The General Secretary processes the data to update existing details and correspondence in accordance with the BAFSAM Council (member board) who act as the controllers. (Article 4(b) and (g))
5. The data is reviewed annually. Personal details of ex members are permanently deleted. (Article 5(e))
6. All information is constantly backed-up, both to a local back-up drive and to a cloud-based system (icloud). The privacy statement can be reviewed [here](#)
7. Mailings to the general membership, are sent using 'blind cc' within email to protect members email addresses. (Article 5(f)). Members are of course free to share their contact details with each other.
8. Member and associate information is never shared with any other organisation for any reason, including data processing, other than for point 3 above. (Article 5(f))

9. Where contact with BAFSAM is made via the website, information is used to respond to the query appropriately. In the event of no further contact being envisaged, the data is deleted. The privacy statement of the website host can be viewed [here](#).

10. Personal details collected at promotional events etc are disposed of within three months if no further contact is envisaged or at the annual review if there is likely to be no on-going communication.

Annex

1 GDPR

1.1 Definitions – Article 4(a)

- a) **'personal data'**, means any information relating to an identified or identifiable Natural Person ('Data Subject'); an identifiable Natural Person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that Natural Person;
- b) **'processing'**, means any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction;
- g) **'controller'**, means the natural or legal person, public authority, agency or other body which, alone or jointly with other, determines the purposes and means of the processing of personal data; where the purposes and means of such processing are determined by Union or Member State Law, the controller or the specific criteria for its nomination may be provided for by Union or Member State Law;

1.2 Principles – Article 5

- 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) **retained 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.

Article 6 Lawfulness of Processing

Processing of personal data shall be lawful only if and to the extent that at least one of the following applies:

- a) the data subject has given **consent** to the processing of their personal data for one or more specific purposes;
- b) processing is necessary for the performance of a **contract** to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract;
- c) processing is necessary for compliance with a **legal** obligation to which the controller is subject;
- d) processing is necessary in order to protect the **vital interests** of the data subject;
- e) processing is necessary for the performance of a task carried out in the **public interest or in the exercise of official authority** vested in the controller;
- f) processing is necessary for the purposes of the **legitimate** interests pursued by a controller, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data, in particular where the data subject is a child. This shall not apply to processing carried out by public authorities in the performance of their tasks.