

GDPR Compliance Statement & Policy

The General Data Protection Regulations (GDPR) which are in force from the 25th May 2018 build upon the Data Protection Act 1998 and EU Privacy and Electronic communications Regulations (PECR) 2003.

Colchester Radio Amateurs (CRA) captures, processes and uses individual members' information for the sole purpose of administering the club membership and related activities. Where we pass on your information to 3rd parties, we do this specifically for arranging training/exams (e.g. with RSGB) and for providing notification of attendees at events (with event hosts). Where we share this information it will always be the least amount possible and only where specifics are requested.

All CRA members' personal information held by CRA is processed under the GDPR category of "*Legitimate Interest*". The following table identifies what we capture, where it is stored and why we may need it.

Data Identification:

- "Membership Form": the paper form used when signing up to membership.
- "Membership List": the processed data from the form into a usable, simplified form.
- "Attendance Record": the sign-in notebook used to record who attends meetings.
- "Equipment Loan Form": the paper form used when borrowing club equipment.
- "Equipment Inventory": the list of club equipment and its status incl. who has it.
- "Member Directory": the simplified list of First Name, Callsign, Town, & Email address, distributed to membership only.
- "Club Net Lists": the published records of club net participants in the public domain.
- "N/L distribution": the list of members to whom the club newsletter may be emailed.
- "Training arrangements": comprises forms etc required to arrange training / exam provision with RSGB. These records are deleted/destroyed after the training/exams have taken place.

Data Captured	Where Used/Why	3rd Parties	Data Storage Access	Data Lifespan
Full Name	Membership Form Membership List Attendance Record Equipment Loan Form Equipment Inventory Training arrangements	Event hosts RSGB	Committee Only	Membership +12-months
Callsign	Membership Form Membership List Attendance Record Equipment Loan Form Equipment Inventory Member Directory Club Net Lists	Event hosts	Committee Only	Membership +12-months
Date of Birth	Membership Form Membership List Training arrangements	RSGB	Committee Only	Membership +12-months
Address	Membership Form Membership List	None	Committee Only	Membership +12-months
Email address	Membership Form Membership List N/L Distribution Member Directory	None	Committee Only	Membership +12-months
Phone Number	Membership Form Membership List	None	Committee Only	Membership +12-months

Since *legitimate interest* is the CRA lawful basis for processing, in the case of members under 16 years old, CRA balances its own legitimate interests in processing personal data against the interests and fundamental rights and freedoms of the child. This involves a judgement as to the nature and purpose of the processing and the potential risks it poses to children. CRA will also take appropriate measures to safeguard against those risks.

Data Limitations:

Members who communicate their personal details to 3rd parties directly (e.g. as part of the training process to RSGB) should direct all GDPR enquiries to the organisation directly. Where CRA follow-up or communicate on your behalf (e.g. official confirmation of attendance at training/exams), please contact CRA under GDPR to ascertain the information transferred.

Data Accuracy:

It is beholden on CRA to ensure data accuracy. Any CRA member may request to see what data is stored by CRA, how it has been used, and the procedures in place to ensure data protection. Please do this in writing, clearly stating that it's for a "GDPR information request". CRA will have not more than 30 days in which to respond and, although unlikely, may levy a proportionate fee to provide said information. Should you require corrections to your data (e.g. moving house, changing callsign) please inform the CRA Treasurer at your earliest convenience. Where that data has been passed to 3rd parties, and that data is now incorrect, GDPR places a burden on CRA to forward the corrected data to the 3rd party so that they may update their records. Under GDPR, individuals have the right to also request data transparency directly with 3rd parties.

For non-CRA members and people who have contacted CRA via a public-facing medium (e.g. email, website, etc.) we will store your details as long as is necessary to facilitate your enquiry or action request. If you are on a waiting list, your details will be kept for as long as that list is in existence plus 12 months. This is so that we can inform you if future places open up if you are unable to join the first time round. If you engage in business dealings or transactions with CRA, we will keep your information indefinitely (e.g. email address, name, email contents) as a record of club transactions and in case of audit. Where possible, data will be anonymised or deleted.

For CRA members who leave the club or whose membership is not renewed, your details will be kept for at least 12 months after your membership lapses (until the next membership cycle and data cleanse, at which point it will be anonymised or deleted. Attendance records will be kept indefinitely, with personal information removed if requested under GDPR compliance.

Requesting Data Transparency:

GDPR places a responsibility on CRA to ensure we can let you know precisely what information we hold on you, what it looks like (the actual data) and the procedures for keeping it safe. Please address all GDPR requests to the CRA Treasurer by email with the subject line "GDPR Information Request". CRA has 30 days in which to reply and, although unlikely, is permitted to levy a proportionate fee. CRA reserves the right to refuse GDPR information requests should they be deemed spurious or an abuse of the Regulations.

Data Breach Notification:

CRA take data protection extremely seriously and all data is stored securely on electronic media by the Club Treasurer. Data sharing is limited to serving committee members. Should any breach occur, CRA will inform all members within 72 hours.

GDPR Complaints Procedure:

Should you feel that CRA has been deficient in some aspect of GDPR and the processing of your personal data; in the first instance please inform CRA through any committee member so that we may investigate and seek to make any correction to our systems should they require it.

Data Protection Officer:

CRA is not required under GDPR to appoint a Data Protection Officer, although it is the responsibility of all Committee members to ensure data security and compliance. However if you have any GDPR enquiries then please contact the CRA Treasurer in the first instance.