

Steady State Manchester

General Data Protection Regulation (GDPR) Compliance Policy and Statement. May 2018

Terminology: in what follows we use the terms “individual” and “subject” to refer to people about whom we hold personally identifiable data.

1) We have assessed whether we are required to register with the information commissioner and conclude that we do not.

Registration self-assessment

1. Do you use CCTV for the purposes of crime prevention?

No

2. Are you processing personal information?

Yes

3. Do you process the information electronically?

Yes

4. Is your organisation responsible for deciding how the information is processed?

Yes

5. Do you only process information for one of the following purposes?

No

6. Are you a not-for-profit organisation that qualifies for an exemption?

Yes

You are under no requirement to register

Some not-for-profit organisations are exempt and based on the information you have provided you do not have to register with the ICO.

However, it is important that your organisation adheres to the principles of the Data Protection Act (DPA) and understands best practice for managing information. To help ensure you are complying with the DPA, we have produced a range of [training materials](#) including practical toolkits, training videos and more.

You can still [register voluntarily](#) if you wish.

2.) We have reviewed the 8 Principles for Data protection and will comply with them.

“Under the GDPR, the data protection principles set out the main responsibilities for organisations.

Article 5 of the GDPR requires that personal data shall be:

“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) 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.”

3) We will collect and hold personal data for the following purpose:

The individual whom the personal data is about has consented to the processing in order for us to contact them with information about our activities.

4) To meet that purpose we hold the following information:

a) Mailing list subscribers:

First name, Family name, Email Address.

b) Members of Steady State Manchester:

First name, Family name, Email Address, street address with postcode, subscription level, frequency and method of payment (but not bank details), stated interests.

5) Storage and management of information, including data security.

a) Mailing list subscribers:

Information is held on a database operated by a third party: MailChimp. We have used their facilities to ensure GDPR compliance in terms of consent. Access, which is password protected, is by SSM officers.

b) SSM members:

In addition to information held on the MailChimp database (see above), membership information is held on a spreadsheet accessible to SSM officers on a shared drive under password protection.

Individuals may subscribe to either of the above two categories through our website, or via a paper form. In the latter case, the paper record will be

destroyed once the data has been entered on the corresponding secure database.

6) Accuracy of information

We will take reasonable steps to ensure the accuracy of any personal data we obtain;

- *ensure that the source of any personal data is clear;*
- *carefully consider any challenges to the accuracy of information; and*
- *consider whether it is necessary to update the information.*

7) Retention

We will retain personal data only for so long as it is needed for our declared purpose. We will securely delete information that is no longer needed for this purpose and update, archive or securely delete information if it goes out of date. That includes when consent is withdrawn by a subject.

8) Rights

The Data Protection Act gives rights to individuals in respect of the personal data that organisations hold about them. More information can be found at this link: <https://ico.org.uk/for-organisations/guide-to-data-protection/principle-6-rights/> We will respond to all representations made by subjects in respect of these rights, in relation to any data we hold about them. We can be contacted at steadystatemanchester@gmail.com.

9) International

Data is not transferred outside the UK/European Economic Area except where it is held on third party servers that are themselves compliant with the GDPR. To the best of our knowledge, the two services we use, MailChimp and DropBox are compliant with these requirements.

10) Website

Our website uses the platform provided by Wordpress.com. We do not hold personal data on it. However, followers of the blog (part of the website) do provide their email address to wordpress.com. Wordpress.com states that it is compliant with GDPR.

11) Social Media

We use social media (twitter, Facebook and LinkedIn) to publicise our work. We do not collect personal data from those services.

12) Roles

The **data controller** is the Secretary of Steady State Manchester. **Data processors** are members of the SSM collective as defined by the controller in consultation with the collective.