



Data Protection Policy & Privacy Statement For Sanday Men's Shed and Web Site

Last updated	18/09/2023	This draft policy is temporary, awaiting adoption by the Sanday Board
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Definitions

"Charity"	Means Sanday's Men's Shed, a registered charity, Scottish Charity Register, SCIO number SC050265
"SMS"	Sanday Men's Shed
"HSE"	Health & Safety Executive
"We" "Us" "Our"	Refers to The Charity, or MS
"You" "Your"	Refers to any individual who may have their personal data processed by Us
"GDPR"	General Data Protection Regulation (Regulation (EU) 2016/679)
"OSCR"	Office of the Scottish Charity Regulator
"Responsible Person"	GDPR Data Controller for BMS. The current incumbent is given on the "Contacts" page of the Sanday MS web site – we need to update the website and this page
ICO	Information Commissioner's Office

Why your data is collected:

We maintain a database which contains necessary minimum personal data as collected during membership application and during the course of our activities including for HSE purposes. We will use all reasonable care to keep this data up to date and secure.

This Privacy Statement explains how we collect, store, manage and protect your data. It outlines the types of data that we hold and how we use this information to carry out the activities of **Sanday Men's Shed (SMS)**. We aim to be clear when we collect your personal information, and not to do anything you wouldn't reasonably expect.

The legal basis for holding your data is your Consent for us to hold this data. We need this data to be able to fulfil our obligations under our Constitution, for the Office of Scottish Charity Regulator (OSCR) requirements, and where applicable to ensure the Health and Safety of you and other members when engaged with activities or presence in the **SMS** Workshop. If you do not provide your consent for us to hold this minimum necessary data, we may be unable to admit or retain you as a **SMS** Member or may restrict your access to Workshop activities.

This Policy/Privacy deals with the data obtained via **SMS** membership interaction. There is also a specific section below regarding your use of our web sites.

How your data is collected

Data is typically collected through the 'Sanday Men's Shed Welcome Form'. Further data may be collected as necessary for further activities for example for Health & Safety reasons when managing our Workshop and Premises.

What information do we collect about you?

As part of management of the **SMS**, we store and process personal information relating to our members. We have reviewed our responsibilities under the GDPR and take our responsibilities under this regulation seriously; the personal information we obtain is held, used, transferred, and processed in accordance with this regulation. The information we store **may** include:

- Name and title
- Postal address, email address, phone number(s)
- Emergency Contact
- Contact preferences: mail, email, telephone number.
- Medical conditions: heart, dementia, stroke, diabetes etc – **why would we need this??**
- Necessary and relevant information (only) that may become necessary to meet Health and Safety requirements associated with operating our Premises including our Workshop, which includes hazardous machinery, tools and materials.

We will minimise the data held and processed to that necessary only for management of the **SMS**.

We aim to keep your details up to date and will occasionally conduct surveys to check the contact details we have for you are correct, updating them where appropriate.

How we use your data

Upon receiving your consent to use your personal data, it will be used and processed by the **SMS** for a range of activities including (but not exclusively):

- Administrative requirements
- Notification of meetings
- Sharing information regarding our activities
- Retaining information related to HSE requirements in our workshop and premises. A copy of this information will **be held in the workshop in paper form for use in an emergency such as injury; this will be kept locked with access only by the authorised key holder on duty.**

To accomplish these purposes, communications may be sent by post, email or WhatsApp as indicated by you on your Welcome Form.

Retention of your Data

In consenting to share your Data, you are giving permission for us to retain your Data for as long as is necessary for

the purposes set out above, but certain Data may subsequently be retained for recording or auditing purposes or as required by law, our constitution or OSCR. When any Data reaches the end of its retention period it is destroyed securely.

Protecting your data

We are committed to holding your data securely and sensitively, in accordance with the GDPR. **Your data is held on a secure computer and/or paper file within the Responsible Person's premises.** Computer data is protected by appropriate authentication or encrypted. Data may be held on paper where this data has been provided to us in paper form, such as physical membership application forms, or for HSE reasons as stated above. Access to all such data is restricted to the Responsible Person and any other individuals necessary but these will in any case be limited to **SMS** Board Members and Trustees authorised to see such data to carry out their duties with the **SMS**. This access is reviewed at board meetings.

We will not disclose your data to individuals, organisations, or other entities outside the **SMS**. We do not sell to or trade your data with any other organisations. Your Data will not be made available to any third party including with any commercial organisation for direct marketing purposes.

For bulk communications to many members by e-mail we will use the **BCC function** in our e-mailer to prevent your e-mail address being released to other individuals without your explicit consent. E-mails between **SMS** members, or Reply, Forwarded or follow-up e-mails from our members arising from one of our bulk e-mailings are excluded from this privacy policy as we have no control over the use of your e-mail by any member who may know or come to separately learn of your e-mail address.

If the security of the data we hold is breached, we will promptly assess the risk to you and if the breach is of a relevant nature also report this breach to the ICO.

Your rights

You are obliged to share necessary minimum membership data with us in order to allow us to fulfil our responsibilities under our Constitution and OSCR requirements and for any HSE purposes as referred to above. If you wish to terminate our processing of data, we will observe this wish but it is possible this will mean we will require you to resign membership of the **SMS**. We undertake not to record or use your data in any way which will cause damage or distress. We will use your details until you tell us you resign as a member of the **SMS**. We will always try to ensure that the data we hold for you is up to date, reasonable and not excessive.

You have the right to:

- Request a copy of the information we hold about you, free of charge and for your own purposes, provided in a commonly used and readable form, within one month of submitting your request to a board member.
- Request amendments to the information we hold about you.
- Change your communication preferences at any time.
- Withdraw consent, object to the processing of your information, request that we erase your personal information from our records or restrict the processing of your data at any time; as stated, this may require you to resign as a member of the **SMS**
- Lodge a complaint with the Responsible Person, escalated if required to the **SMS Chairman**, or the ICO

Data accuracy

You are encouraged to make sure that your own data is accurate by communicating your updated details to us or by returning any update forms we may issue to you.

Communication with Us / Access Requests

This Policy is made available on the **Sanday MS** web site at <https://www.sandaymensshed.com> If you are unable to access this and require a paper copy, please request it.

If you have any questions about this privacy statement, or would like to receive a copy of the information we hold about you, please contact us at: <http://sandaymenshed.com/>

Responsible Person

This GDPR / Privacy policy is operated by a "Responsible Person". As a small Charity organisation, we do not have (and are not required to have by the GDPR) a dedicated person responsible for GDPR compliance. The role is likely to be shared by an individual who has other responsibilities. The current incumbent in the role is listed on the Contacts page of the **SMS** web site. The incumbent may be changed as required from one person to another or may come under the responsibility of the **SMS** Chairman or Secretary to either take up the role or nominate a new incumbent.

ICO Registration Exemption

As a not-for-profit organisation which only processes data for the purposes of managing membership information we are exempt from registration.

Refer to <https://ico.org.uk/for-organisations/register/self-assessment>

Children and International requirements

Sanday MS do not hold data on Children, nor do we have any international connections or business.

Our web site is viewable from abroad and we have no control over how information on the web site may be used, however, we do not post personal information (other than names of Trustees & Board members (**this is not on the website as yet?**)) or if necessary, will only post any such information with your express consent.

Our Web sites / Cookies (**This needs reviewing as we update our site Clive!**)

We operate a web site at <https://www.sandaymensshed.com> and **also have a Facebook page (Needs a link please) and Twitter page @SandayShed**. The privacy policies for Facebook and Twitter are operated by Facebook and Twitter and for further information refer to their web sites. The information below refers only to our own web site.

Our website is built from a standard Wordpress "content management software" package. This uses cookies on our website. A cookie consists of selected information sent by a web server to your web browser and stored by the browser. The information is then sent back to the server each time the browser requests a page from the server. This enables the web server to identify and track the web browser.

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