

Data Protection Policy

1. Overview

1.1 Orpington Astronomical Society (hereafter referred to as the 'OAS') is a registered charity¹ with the sole objective of promoting an interest in the science of astronomy. Its area of operation is centred on Orpington, but extends to Bromley, Sevenoaks and their environs.

1.2 In order to effectively carry out this objective the OAS is obliged to hold some personal data of its members. It also operates a website for the purpose of disseminating Society information and which includes a forum for the discussion of items of astronomical interest.

1.3 The membership data thus held is solely used for the purposes of running the OAS and making its membership aware of society activities, opportunities to attend related events and news. The data is kept with the approval of the individual members and the amount held is kept to the absolute minimum necessary for the Society to function.

1.4 The OAS Membership form shown in Annex A details the personal data collected along with the individual member's consent for the OAS to hold and use their personal data in order to carry out its activities according to this policy.

1.5 It is the policy of the OAS that upon joining the Society only the following information is collected and held:

- Full name;
- Home address;
- Email address;
- Home and mobile telephone numbers;
- Date of birth if under 18 years old;
- The date the Society was joined.

1.6 The OAS does **NOT** collect **NOR** hold any personal financial data, although it may on occasion contract with an approved transaction processor who has demonstrated compliance with GDPR, in order to facilitate legitimate payment for subscriptions or other services.

1.7 The membership data is only held by elected members of the OAS Committee, Sections 2.4 and 2.5 refer.

1.8 Member's data will **NEVER** be passed to any third party organisation without the individual's prior explicit consent, however see Section 2.7.

¹Registered in England and Wales No. 289661

1.9 The responsibility for implementation of this policy lies with the Chair of the OAS who has the role of 'Data Controller' as required by General Data Protection Regulations, but in practical terms maintenance of current personal data lies with the OAS Membership Secretary and the Website Manager in respect of the OAS Website. More details on data protection principles and GDPR can be found on the Information Commissioners Office (ICO) website <https://ico.org.uk/>.

2. Personal Data Management

2.1 OAS membership data is held in an encrypted, password protected data file (hereafter in this document referred to as the 'Membership Spreadsheet').

2.2 The Membership Spreadsheet shall be kept up to date by the OAS Membership Secretary, who alone can edit or update it.

2.3 The Membership Spreadsheet shall only be held or accessed using computers that have up to date antivirus protection.

2.4 Other than the Membership Secretary, the only OAS Committee members permitted to view a (password protected) copy of this spreadsheet are:

- The Chairman;
- The Vice Chair;
- The Website Manager;
- The Treasurer.

2.5 In exceptional circumstances other members of the OAS that have been co-opted on to the Committee or have become an Associate Committee Member for a specific reason, may be permitted to access the Membership Spreadsheet for a limited period.

2.6 For OAS officers who need to communicate with the membership by email, such as the editor of TOAST (the OAS quarterly magazine), a confidential email group called the 'Toast-list' is available to protect the privacy of individual members.

2.7 The OAS may contract with Membermojo to act as their *Data Processor*². Membermojo provides membership services to a number of UK organisations. Membermojo has confirmed that all Membermojo servers and backups are hosted in secure UK facilities and that Membermojo complies with UK GDPR requirements.

² Information Commissioners Office (ICO) key definition

3. Data Retention and Members' Rights

3.1 Members' data shall only be held for as long as they are a paid up member of the OAS, after 6 months it will be deleted.

3.2 OAS committee members holding a copy of the Membership Spreadsheet shall permanently delete their copy if they change or end their OAS Committee role.

3.3 Any member has the right to view the data held by the OAS (or on their behalf by Membermojo) and have it corrected or deleted at any time, the request shall be in writing via the Chair of the Society (Section 1.9 refers). However Membermojo undertakes to provide security and access controls for members' data and functions that assist members to exercise their rights under GDPR. They include:

The right to access – members will be able to sign in to view their own personal data.

The right to rectification – members will be able to sign in and amend their personal data.

The right to erasure – OAS administrators can securely delete personal data for members requesting their data be erased. Erasing a member will remove their member record and anonymise any activity, attendance and (optionally) payment records.

Membermojo's Privacy Policy describes how they handle membership data. See <https://membermojo.co.uk/mm/help/privacy>

3.4 Deletion of all of a member's data at the request of a member will result in termination of membership.

4. Website Operation

4.1 General Operation

4.1.1 The OAS Website is available to anyone, however some parts of the Forum can only be accessed by OAS members and who have had an account set up by the OAS Website Manager.

4.1.2 Anyone with an account logging into the site will have a temporary cookie set up to determine if the browser accepts cookies, this cookie contains no personal data and is deleted on closing the browser.

4.1.3 Upon logging in several cookies will also be set up to save login information and screen display choices. Login cookies last for two days, and screen options cookies last for a year. If "Remember Me" is chosen, the login will persist for two weeks. Upon logging out of the account, the login cookies will be removed.

4.1.4 Upon editing or publishing an article, an additional cookie will also be saved in the browser. This cookie includes no personal data and simply indicates the post ID of the article just edited. It expires after 1 day.

4.2 Embedded Content From Other Websites

4.2.1 The OAS Website may include embedded content such as a Twitter feed, videos, images, etc.; such content will behave in the exact same way as if the visitor has visited the other website, and hence may collect data, use cookies, embed additional third-party tracking, and monitor interaction with that embedded content, as if logged in to that website.

4.3 User Accounts and Data Retention

4.3.1 Forum users can set up a profile which can contain personal information they choose to include and which is then visible to any logged in user. Individuals can edit, or delete their personal information at any time (except they cannot change their username). Similarly the OAS Website Manager can also see and edit the profile information.

5. Action to be Taken in the Event of a Possible Data Breach

5.1 With reference to Information Commissioner's Office (ICO) Website the risk to individual members associated with a breach of OAS data is assessed as at worst being 'neutral', or more probably 'unlikely'. Nevertheless on becoming aware of a possible data breach, the OAS Chair shall within 72 hours contact the ICO by telephone to discuss the breach to decide what if any action needs to be taken.

5.2 OAS Chair shall inform in writing any member that may be affected that there has been a breach and what personal data may have been accessed.