

DATA PROTECTION AND PRIVACY POLICY

24 January 2020, Data Manager LDWA

1. LDWA DATA PROTECTION AND PRIVACY POLICY

This data protection and privacy policy was approved by the NEC on 31st January 2020.

Introduction

This is the Data Protection and Privacy Policy (DPP Policy) of the Long Distance Walkers Association Limited (LDWA). The LDWA is an Association of people with the common interest of walking long distances mainly in rural, urban, mountainous or moorland areas. It is a Company limited by Guarantee. The Local Group Committees and the National Executive Committee (NEC) are all volunteers.

The LDWA respects the privacy of 'Users', who are our members, website users, participants of its events and activities, and all others who may give it personal information.

Personal information is any information that can be used to identify Users, including full names, date of birth, sex, email and postal address, telephone numbers, personal health details, photographs, purchases of goods and services and credit/debit card details.

The LDWA will not sell or transfer personal information to any third party without the User's permission.

The LDWA will make all reasonable efforts to protect the privacy of all Users and maintain the security of all personal information held. Personal information provided to the LDWA will be treated in accordance with this DPP Policy and current UK Data Protection legislation.

No personal information will be stored, processed or published about those aged less than 16 years without the consent of their parent or guardian.

This Policy distinguishes between:

1. The personal information required by the LDWA to become a member, to participate in Events, to purchase goods and services from the website, to be listed in the Hillwalkers' Register or National Trails Register (together, the 'Registers'), or for any other activity of the Association, and;
2. A limited set of personal information ('Summary Information') which will be used for the Association's records and its members. Such Summary Information is limited to first name, family name, date of birth, sex, postal town, email, membership number, LDWA Group affiliations and any linked long distance walking achievement.
3. Sensitive Personal Information held about Users. This includes personal medical details held to maintain participant's health and safety in Challenge Events and other walks as well as personal financial information about bank accounts and other payment sources. This also includes any data held relating to minors under the age of 16.

Data protection management

The LDWA has, and will continue to appoint, a board member as its Data Manager, although his/her duties do not formally extend to that of a Data Protection Officer. The Data Manager will liaise with all members of the Board and with the Membership Secretary and Internet Officer in particular.

The LDWA will train volunteers as required. Guidance Notes, which will be reviewed at least every two years and which are available on the website, will be the principal training medium

The LDWA also has a User Guide to Data Protection disseminated via the website and by correspondence where necessary. The User Guide has statements about LDWA membership and of its associated groups, purchases, challenge events, social walks, other events, registers and other matters. This User Guide incorporates the Association's Privacy Statement for the purposes of data protection legislation.

Uses of personal information

Users give the LDWA their personal information when they:

1. Ask about our activities
2. Join as a member or reconfirm their membership
3. Purchase goods from the website
4. Take part in one of the LDWA's Challenge Events or Social Walks
5. Claim an entry on the Registers
6. Participate in other events, such as the AGM or Group parties

7. Otherwise give the LDWA personal information.

The LDWA use Users' personal information to:

- Manage the Association
- Communicate with Members and others about activities and events
- Send emails and post
- Send our journal, Strider, Chair's newsletters and local group newsletters
- Fulfil orders for goods and services
- Improve the LDWA Website
- Satisfy the requirements of our insurers
- Fulfil our legal obligations and other legitimate business purposes

Some facilities on our website invite Users to provide the LDWA with personal information, for example when sending an email. The purpose of these facilities is apparent at the point that Users provide their personal information and the LDWA only use that information for those purposes.

The lawful basis for holding members personal data is to provide core services to the membership, including communications about governance, membership fees, events and activities.

The lawful basis for holding data about a Challenge Event, Register, Social Walk or other Activity is that Users give consent to their personal information being processed to administer that Activity.

Challenge Events organisers and the Hillwalkers' and National Trails Register recorders normally publish Summary Information linked with the relevant long distance walking achievement of Users.

To administer the activities the LDWA provides, some personal information of Members will be shared with local groups in their Local Group Area and in their Associated Group Areas for the purposes of running the Group, its walks and other events. This information will be limited to first name, family name, date of birth, sex, email address, postal town, and membership number.

Organisers of Social Walks and Other Events held by the LDWA and its Local Groups may collect the first name, family name, contact phone number, LDWA membership number and the contact phone number of participants and their next of kin. Such information will only be used for the purposes of managing the walk/event.

Users may ask the LDWA and its local groups to store additional personal information, such as their telephone numbers and any social media account names, to enhance the service the LDWA and its Local Groups are able to give the User.

Personal information management

The LDWA use strict procedures and up-to-date security features to prevent unauthorised access to personal information held on the National Membership Database.

Users should understand that all personal information held on the personal electronic storage devices of event organisers, register recorders and other volunteers is inherently not as secure as that on the National Membership Database.

The LDWA has produced - and regularly updates - briefing notes, kept on the LDWA website for:

1. Members of the Association and other Users (called the User Guide).
2. Officers and Volunteers of the LDWA responsible for personal information held on their own electronic storage devices or on paper records (called Briefing Notes).

The LDWA use a supplier to provide services related to running the website and management of the National Membership Database. Staff of this supplier necessarily has access to information held on this Database. The supplier is subject to a signed contract, which includes provisions to support the LDWA's commitment to protect its User's data in general and to compliance with the Data Protection Act 2018.

LDWA printers are given access to names and addresses to be able to mail out Strider and other communications with members and for no other purpose. This supplier is subject to a signed contract, which includes provisions to support the LDWA in its commitments to the data protection of its users in general and to compliance with the Data Protection Act 2018.

For Challenge Events, The LDWA often uses third parties (SI Entries, for example) to manage the application and to receive the entry charge for the Event. In these circumstances, these third parties are acting as data

processors for the LDWA and are committed to keeping the personal information of applicants confidential. As a data processor, these third parties also have obligations under the Data Protection Act 2018.

Data will not be transferred outside a third country that has functions comparable to those of a competent authority with appropriate safeguards, for example the European Economic Area.

Access to all personal information held by LDWA, including by Local Groups, will be limited on a need-to-know basis to specified LDWA volunteers, as agreed by the LDWA's NEC from time to time.

Individuals should always be given the opportunity to withdraw from group photographs taken at LDWA events should they wish. Photographs of participating individuals taking part in LDWA events may be used in Strider, on the website and on social media channels. The LDWA will make all reasonable efforts to remove such photographs from the website and on social media channels under LDWA control, if requested to do so by any User featured in such a photograph.

Retention policy

Summary Information for Membership, Events and Registers will normally be retained in perpetuity in electronic form. Such Summary Information will be anonymised on request after three years if a membership lapses or after an Event has occurred or for future editions of the Registers.

Other personal membership information will be retained during the duration of membership. Such information for all lapsed members will be held for up to five years after membership has ceased and thereafter deleted from all storage devices.

With the exception of Summary Information, organisers of Challenge or Social Events will destroy personal information held in submissions by individuals within three years of the event.

Information relating to claims for inclusion on the Registers will be held in perpetuity as that information is necessary to maintain the Registers on an ongoing basis.

Personal information related to the Purchase of goods and services will be retained for seven years after purchase so as to allow the LDWA to conform with financial reporting obligations.

Users may request the removal of their personal membership information at any time after they have ceased to be a member. All such data held on electronic storage devices or as paper records will be removed within one month of a request being received. The right to have this data removed may be superseded by any legal obligations of for purposes of public interest as outlined by the Data Manager.

Users who wish their data to be removed from records of Challenge Events, Registers and other such lists will be expected to identify all such events, registers and lists since the LDWA does not currently keep a central list of participants in all such events. Once these events, registers and lists have been identified, the User's personal information will be removed or rendered anonymous where applicable.

User rights

The LDWA has a firm commitment to comply with The Data Protection Act 2018 and particularly with the following rights of the individual, the right:

- to be informed
- of access
- to rectification
- to erase
- to restrict processing
- to data portability
- to object, and
- rights in relation to automated decision-making and profiling

For more information or to activate these rights, Users should send an email to the Data Manager at LDWA (datamanager@ldwa.org.uk).

Under the DPA 2018 the LDWA must ensure that Users' personal information is accurate and up to date. Therefore, Users should advise the LDWA of any changes to their information via the LDWA website. If Users do not have access to the website, they should contact the Membership Secretary, in which case their details will be amended within one month of receipt of such a request being made.

Members have the right to stop certain emails sent from the LDWA National Email List, the Local Group Email List or the Associated Groups Email Lists. This right does not include correspondence relating directly to the membership offer, such as those about governance issues, subscriptions, elections etc.

Members also have the right not to receive Strider or Group Newsletters.

Users should contact the LDWA Data Manager if they feel that the LDWA has not followed this Data Protection and Privacy Policy. Users can contact the Data Manager at datamanager@ldwa.org.uk.

Website

Reference to the website in this DPP Policy refers to the LDWA's main website at www.ldwa.org.uk and also any subsidiary websites operated by Local Groups.

The LDWA stores small text files called cookies on the User's electronic storage device when Users visit the website. Other website terms and conditions apply, which are described in a file of the same name held on the website.

When the LDWA collects Users' personal information over the internet, it cannot guarantee the total security of any information Users transmit to the LDWA and Users transmit this information at their own risk.

Training

LDWA takes its volunteer training seriously. Clear instructions and guidelines will be issued to NEC members, event organisers, register recorders and others as required, and reviewed at least every two years.

Changes of Data Protection and Privacy Policy

This Policy may be changed at any time by the NEC. The new Policy will be updated on the LDWA website following any such change. Members will be informed of any significant changes to the Privacy Policy prior to membership renewal each year.