

DATA PROTECTION AND PRIVACY POLICY

7 April 2018, Christopher Hedley, Data Manager LDWA

1. LDWA DATA PROTECTION AND PRIVACY POLICY

This data protection and privacy policy was approved at the NEC meeting on 7 April 2018 with very minor textual clarifications on 4 May 2018.

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, mountainous or moorland areas. It is a Company limited by Guarantee. The Local Group Committees and the National Executive Committee (NEC) are all volunteers.

We respect the privacy of 'Users', who are our members, website users, participants of our events and activities, and all others who may give us 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.

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

We will make all reasonable efforts to protect the privacy of all Users and maintain the security of all personal information we hold. Personal information provided to us 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.

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 Association 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 us 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 our 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 us personal information.

We 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, and local group newsletters
- Fulfil orders for goods and services
- Improve our 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 us with personal information, for example when sending us an email using our email queries facilities. The purpose of these facilities is apparent at the point that Users provide their personal information and we 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 we provide, 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

We 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).

We 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 Acts in particular.

Our 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 Acts in particular.

For our Challenge Events, we often use 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. Action will be taken by the LDWA to put this commitment onto a contractual basis.

Data will not be transferred outside 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 Association's NEC from time to time.

Individuals should always be given the opportunity to withdraw from group photographs taken at LDWA events. 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 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 Association 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.

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 within one month of a request being received.

User rights

The LDWA has a firm commitment to comply with the current Data Protection Legislation 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 applicable data protection legislation the LDWA must ensure that Users' personal information is accurate and up to date. Therefore, Users should advise us 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 we have not followed this Data Protection and Privacy Policy. Users can contact us by email 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.

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

When we collect Users' personal information over the internet, we cannot guarantee the total security of any information Users transmit to us 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.