

DATA PROTECTION POLICY

1. About this Policy

1.1 This policy explains when, how and why we collect personal information about our members, prospective members, and any other interested parties, as well as how we use this information, how we keep it secure, and your rights in relation to it.

1.2 We have legitimate and mutually beneficial purposes in recording, using and storing your personal data, as described in this Data Protection Policy, when we collect data from you.

1.3 We will always aim to comply with the General Data Protection Regulation (GDPR) when dealing with your personal data. Further details on the GDPR can be found at the website for the Information Commissioner (www.ico.org.uk).

1.4 For the purposes of the GDPR, a member of our committee will be the designated “controller” of all personal data we hold about you.

1.5 We reserve the right to amend this Data Protection Policy when appropriate, especially if some important clarification is needed, or there is a clear need to extend its scope in some way.

2. Who are we?

We are Chertsey Film Society.

Chertsey Film Society is an unincorporated association which operates on a non-profit basis for the benefit of its members. Our main activity is the exhibition (screening) of films which are attended by our members and their guests.

We can be contacted:

By Post: c/o 28 Wheatash Road, Addlestone, Surrey, KT15 2ER.

By Telephone: 01932 563125

By Email: info@chertseyfilm.org.uk (*General enquiries*)
data@chertseyfilm.org.uk (**Data policy enquiries**)

3. What information we collect and why

The GDPR uses the term 'processing' of data to mean doing any of the following with an individual's personal information: obtaining it, recording it, storing it, updating it and sharing it. 'Personal information' means any detail about a living individual that can be used on its own, or with other data, to identify them.

The GDPR also sets out key principles that organisations need to comply with to ensure that the personal data they gather should be accurate, no more than is necessary, be clear about the reasons for its use, and that there is a 'lawful basis' for processing it.

We collect a number of basic contact details from our members and from various other interested parties, as well as some other forms of information from people who access our website. These are as follows -

3.1 From our members - basic contact details: Their name, address, email address and telephone number(s). The purpose is for the general management of your membership, including –

- a) Sending you an annual membership renewal notice.
- b) Sending you notice of the Annual General Meeting, as required by the Society's Constitution.
- c) Sending reminder emails about our next film if you wish to receive them. Occasionally, we may also inform you about some other film-related events that we think may interest you.
- e) In some circumstances, such as the unavoidable cancellation of a screening, we may contact you by telephone.

It is open to you to reduce the number of ways we may communicate with if you wish, but we have a 'legitimate interest' in being able to contact you on Society matters, especially for purposes a) and b). Name and address is our current default absolute minimum, because we still have a few members who do not have email, and we know some who do have email but rarely look at it.

3.2 From people who are currently not our members. We may hold personal data on certain other groups of people as outlined below.

- a) Prospective members – being persons who have contacted us for information and where we hope that they may be persuaded to join the

Society at some stage. This requires consent. Normally, we would hold only their name and email address, but in some cases we may also or alternatively take a telephone number.

b) Guests attending specific films. Names are recorded against those of the members they come with. This is an established sign-in procedure necessary because of the way the Society operates, and in order to keep track of a limited number of free guest admissions. We have a legitimate interest in recording this. Nothing further is done with this information apart from it contributing to an anonymous count of guest admissions.

c) People involved in broadly similar organisations to our own (other film societies or arts organisations) that we have a perceived need or mutual interest in keeping them informed about our activities. Name & email address, with their consent.

d) People in national/regional film-related 'umbrella' organisations to which we are affiliated, where we have a need to keep them informed about our activities or to contact them about matters that concern us (see also 5.3 below), and for which we have a legitimate interest.

e) Other third parties, i.e. people who we are in contact with in relation to delivering our activities (booking of hall/films, purchase of equipment/supplies/publicity materials, etc), where we clearly have a legitimate interest.

Most communication with individuals in d) & e) would be through normal channels using only the email addresses of their organisation or company, and as such would usually not be regarded as personal information for the purposes of GDPR, but we include them here just to ensure that we are fully compliant.

3.3 Website visitors

When you connect to our website a certain amount of information about your computer is visible to our web hosting service simply because of the way the internet works, and may be recorded in secure log files. In addition, small text files may be written into locations on your hard drive controlled by your browser.

Currently, the situation is as follows –

a) Cookies. We do not currently use cookies to personalise the way you interact with our website. Depending on your browser and its settings, the simplest form of cookie, a text file containing our website's URL (address) may be written. You can choose whether or not to accept cookies through your browser settings.

- b) Access log files. Our web hosting service maintains secure log files of every access to files on our website. These log file records include the IP address of your computer. Our webmaster can view the data in the log files, but only by establishing a secure connection to the web hosting site. In practice, we almost never do this since the information is of minimal use to us in this raw log file form. The access log files are not retained long term and the records are deleted by our web host after a maximum of seven weeks.
- c) Statistical analysis log files. These are similar to the access log file data, but only have one entry per website visit. This also records your IP address (or hostname), some information about the type of device you are using, its operating system, your location (country) and browser. Sometimes the name of your internet service provider will be evident from the hostname, but we have no means of identifying you personally from this. The data in these log files is periodically aggregated into an anonymised statistical summary of website visits, at which time the individual records are deleted, usually every month.

We are currently looking at upgrading the statistical analysis package we use, possibly to Google Analytics, and will update this section of the policy statement if and when we do. Similarly, if we start to use cookies more extensively to improve the website's functionality, then this will be made clear.

4. How we protect your personal data

4.1 We have implemented generally accepted standards of technology and have procedures in place to protect personal data from loss, misuse, unauthorised alteration or deletion.

4.2 We will notify you promptly in the event of any breach of your personal data which might expose you to serious risk.

5. Who else has access to the information you provide us?

5.1 We will never sell or trade your personal data with any other party, in any circumstances. This is stated merely for the avoidance of any possible doubt.

5.2 We will not share your personal data with any third parties without your prior consent (which you are free to withhold) except where required to do so by law.

5.3 We are affiliated to a number of national/regional film-related 'umbrella' organisations who may occasionally ask us for general information about our membership, audience numbers, etc. To the extent that we may give any such information it will only be in a fully anonymised form and no personal data will be passed on.

6. How long do we keep your information?

6.1 For members, we will hold your personal data on our systems for as long as you are a member of the Society and for as long afterwards as is necessary to comply with our Society rules, legal obligations and in the reasonable expectation of membership being renewed.

6.2 We will review member's personal data at various times in every year to establish whether we are still entitled to process it. If we decide that we are not entitled to do so, we will stop processing your personal data.

6.3 We will normally retain members' data for a reasonable period into the following season, because a significant number of members renew late, often several films into the season. We will not extend this retention period unreasonably.

6.4 At the end of this retention period, we will move the name & email address (only) of lapsed members into our 'prospective members' list, on the presumption that they may still have a general interest in our events and could possibly re-join in the future, if the lapsed member confirms to us that they have no objection to this.

6.5 Any email communications sent to prospective members (including lapsed members) or other interested parties will have an 'unsubscribe' option to let us know that you wish to be removed from our email list.

7. Your rights

7.1 You have rights under the GDPR:

- (a) to be informed about the collection and use of your personal data
- (b) to access your personal data
- (c) to have your personal data corrected
- (d) to have your personal data erased in certain circumstances
- (e) to object to or restrict how your personal data is processed
- (f) to have your personal data transferred to yourself or to another business in certain circumstances.

7.2 You have the right to take any complaints about how we process your personal data to the -

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire SK9 5AF
<https://ico.org.uk/concerns/>
0303 123 1113.

For more details, please address any questions, comments and requests regarding our data processing practices to data@chertseyfilm.org.uk.