

## **Notice to club secretaries**

The EU General Data Protection Regulation (GDPR) comes into force on 25<sup>th</sup> May 2018, and we now have a greater responsibility to ensure the personal data we hold on members is accurate, securely stored and only used for the purpose of pigeon racing administration.

The guidance received highlights two key principals:

- Collect personal data with clearly defined purpose, and don't use them for something else
- Don't collect more personal data than you need and be mindful of the personal data under your control.

### **What is personal data?**

Personal data is any information relating to a data subject (living or deceased) who can be identified (directly or indirectly) from the personal data held by the RPRA or any of its officials e.g. name, address, date of birth, telephone numbers, email addresses.

**Check the personal data you collect, process and the purpose for which you do it** – you may be holding members contact details, based on their membership of the RPRA for the purpose of owning, racing and/or showing pigeons.

**Inform members when you collect their personal data** – usually on joining the RPRA. You also have to inform individuals on request about the personal data you hold on them and give them access to their data. Keep your data in order, so that when a member asks you about what sort of personal data you have, you can provide it easily with no extra hassle.

**Keep personal data for only as long as necessary** – data should only be kept for as long as necessary and for the purpose for which you collected it e.g. collection of membership fees, registration of rings, identifying owners of stray birds etc. Deceased members' details can be kept if they are in partnerships and have been registered as 'Exempt' with the region secretary.

**Secure the personal data you are holding** – if you store data on an IT system, limit the access to the files containing the data e.g. by a password. Regularly update the security settings of your system. If you store physical documents with personal data, ensure they are not accessible to unauthorised persons; lock them in a safe or cupboard. If you send emails to your members, be sure to use the BCC (blind copy function) so other recipients do not see the emails addresses of other members.

**Keep documentation on your data processing activities** – prepare a short document explaining what personal data you hold and for what reason e.g. dates of birth for Young Fanciers. You might be required to make the document available to the Information Commissioner's Office when it requires it.

**Make sure your subcontractor respect the rules** – if you sub-contract processing of personal data to any other company, use only a service provider who guarantees the processing in compliance with the requirements of the GDPR e.g. security measures.

**Data Protection officer (DPO)** – As data processing is not a core part of our 'business', the data processing carried out by clubs and organisations is on a small scale and low risk, therefore we do not have to appoint a DPO. However if you need any guidance on GDPR you can contact Julia Field at RPRA HQ for assistance.

Sources of further information: Information Commissioners Office: [www.ico.org.uk](http://www.ico.org.uk)