

Worshipful Company of Lightmongers



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*The Worshipful Company of Lightmongers
Charitable Trust Limited*

(collectively The Lightmongers in this document)

DATA PROTECTION POLICY

Updated May 2018 to incorporate the requirements of the General Data Protection Regulations (GDPR)

For further information on the Lightmongers Data Protection Policy please contact the Clerk in the first instance, on following contact details:

**Phillip Hyde, Clerk, The Worshipful Company of Lightmongers,
1, Manor House Garden, High Street, Wanstead, E11 2RU**

clerk@lightmongers.co.uk

Tel: 02089899006

Key Definitions

The Company holds personal data about our members, individual suppliers of products or services and other individuals for a variety of business/membership related purposes. This policy sets out how we seek to protect personal data and ensure that members/officers of the Court, the Trustees of the Charitable Trust and the Clerk and other data processors, who deal with such data, understand the rules governing their use of personal data to which they have access in the course of their duties.

Business purposes The main purposes for which personal data are used by us are as follows:

- Membership management and provision of management services to members.
- Event management and administration for members and their guests.
- Charity activities and fund-raising.
- Financial management, including provision of formal Accounts, claiming Gift Aid etc.
- General correspondence/administration with members.

Personal data Information relating to identifiable individuals, such as membership applications and subsequent progression for members. Generally the Lightmongers hold names, addresses, qualifications, employer/business information, and contact details for members, including their partners name where provided. Names of member's guests to events are recorded for event administration purposes and shared with the caterers for the purposes of each event only. Subscription, event charges and other costs are recorded per member and monitored until payment. Gift Aid declarations are provided by members and held by the Lightmongers, in order to be able to claim Gift Aid from HMRC in respect of any charity donations made by the members. On-going correspondence with members may also contain personal data.

Sensitive personal data The Lightmongers do not request, hold or process any sensitive personal information about members e.g. an individual's racial or ethnic origin, political opinions, religious or similar beliefs etc.

Privacy Notice Advises members and other individuals for whom we hold personal data, of the purposes for which we hold that data; the legal basis on which we hold and process the data; the limited circumstances in which we may share some of the information in the process of providing them membership services and advises members and other individuals of their rights, under the legislation, with regard to their personal data.

Scope

This policy applies to all Court members, Trustees of the Charitable Trust, Committee Chairmen and service providers/data processors of the Company, who must be familiar with this policy and comply with its terms.

This policy supplements any other policies relating e.g. to Internet and email use. We may supplement or amend this policy by additional policies and guidelines from time to time. Any new or modified policy will be distributed to members.

Responsibility for this policy?

The Company and the Lightmongers Charitable Trust are not required to appoint a Data Protection Officer. The responsibility for this policy rests with the Court and the Trustees of the Charitable Trust respectively. The Policy is maintained and administered by the Clerk on behalf of the Court and the Trustees.

The Data Controller, as defined in the GDPR Regulations, is the Company and the Charitable Trust respectively.

The Data Processors are primarily the Clerk, the Hon Treasurer and the Bookkeeper. From time to time for specific tasks/projects the Master and Officers and Committee Chairs may also be carrying out tasks of data processors. Where a service provider is carrying out data processing contracts will be put in place that requires compliance with the GDPR in that processing.

Procedures for operating this Policy

Fair and lawful processing

We will hold and process personal data fairly and lawfully in accordance with individuals' rights. For the Lightmongers the normal Lawful Basis that will be applied is that of Legitimate Interest, reflecting that we only use the personal data provided by members for the purposes of providing the membership services and support that our Members would expect us to provide. If exceptional circumstances arise, we may on occasion use one or more of the other Legal Bases provided in the legislation e.g. Consent, Contract etc. We provide a Privacy Notice to our Members and any other individuals where we hold personal data to advise them of the Lawful basis being used and of their rights.

The Clerks responsibilities in supporting the Court and Trustees with their Data Controller responsibilities:

- Keeping the Court updated about data protection responsibilities, risks and issues
- Reviewing all data protection procedures and policies on a regular basis
- Arranging data protection guidance and advice for all Court members and those included in this policy
- Answering questions on data protection from Members, Court Members and other stakeholders

- Responding to individuals such as Members and Suppliers who wish to know what data the Company or the Charitable Trust is holding on them.
- Checking and approving with third parties that handle the company's data any contracts or agreement regarding data processing, such as Accounting and IT services and with Caterers regarding Events processing.

Data Processor responsibilities e.g. the Clerk, Hon Treasurer and Bookkeeper

- Ensure all systems, services, software and equipment meet acceptable security standards and that data is being processed correctly and securely.
- Checking and scanning security hardware and software regularly to ensure it is functioning properly
- Researching third-party services, such as cloud services the company is using or considering using to store or process data
- Approving data protection statements attached to emails and event notices

Processing of all data must be:

- Necessary to deliver membership services and events to our Members
- In our legitimate interests and not unduly prejudicing the individual's privacy.

Accuracy and relevance

We must ensure that any personal data we process is accurate, adequate, relevant and not excessive, given the purpose for which it was obtained. We will not process personal data obtained for one purpose for any unconnected purpose unless the individual concerned has agreed to this or would otherwise reasonably expect this.

Individuals may ask that we correct inaccurate personal data relating to them. If individuals believe that their information is inaccurate they should record the fact that the accuracy of the information is disputed and inform the Clerk, see later section on **Individual's rights**.

Individual's responsibilities for their personal data

Members and other individuals are expected to take reasonable steps to ensure that personal data the Lightmongers hold about them is accurate and updated as required. For example, if an individual's personal circumstances change, they must inform the Clerk so that the data can be updated in the records.

Storing data securely

- In cases when personal data is stored on printed paper, it should be kept in a secure place where unauthorised personnel cannot access it
- Printed personal data should be shredded when it is no longer needed
- Personal data stored on a computer should be protected by strong passwords that are changed regularly.
- Personal data stored on CDs or memory sticks must be locked away securely when they are not being used
- Personal data should be regularly backed up in line with the company's backup procedures
- The Clerk must approve any cloud service used to store personal data

Retention of personal data

Personal data should not be retained for any longer than is necessary, including for historical or statistical purposes. What is necessary will depend on the circumstances of each case, taking into account the reasons that the personal data was obtained.

Individuals rights in respect of their personal data held and/or processed by the Lightmongers

Under GDPR and the expected UK Data Protection Law enacting its requirements, individuals have rights with regard to any personal data that the Lightmongers hold concerning them. Those that are relevant to the Lightmongers are listed below and any requests from members or other individuals in respect of their own personal data should be referred to the Clerk for responding to within one month of the request.

- a. The right to be informed (e.g. via a privacy statement, website statement etc.).
- b. The right of access (to their data) e.g. via a Subject Access Request (SAR).
- c. The right to rectification (of their data)
- d. The right to erasure (of their data)
- e. The right to restrict processing (of some or all of their data)
- f. The right to object to the processing of some or all of their personal data.

We will not pass or share member's personal data to/with other organisations other than what may be required as part of the membership of the Lightmongers e.g. City of London register of Liverymen for voting purposes, caterers providing the catering for events etc.

Training

The Clerk has received training on GDPR requirements and their impact on UK Data Protection Law and this Policy. Further training for the Clerk, other data processors and Court members/Trustees will be arranged whenever it is appropriate e.g. there is a substantial change in the law or our policy and procedures.

Reporting personal data security breaches

All those involved in the collecting, holding and processing of members and others personal data e.g. the Clerk, other data processors, Court members and the Trustees have an obligation to report actual or potential data protection compliance failures. This allows us to:

- Investigate the failure and take remedial steps if necessary
- Maintain a register of compliance failures
- Notify the Information Commissioner's Office (ICO) of any compliance failures that are material either in their own right or as part of a pattern of failures

Monitoring

All members of the Court and the Trustees must observe this policy as must all Data Processors. The Clerk has overall responsibility for this policy. He/She will monitor it regularly to make sure it is being adhered to.

Contact regarding this Policy

If you have any questions or concerns about this policy please contact the Clerk

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