



## WSRA POLICY No D1: Data Protection

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This Data Protection Policy is the overarching policy for data security and protection for West Somerset Railway Association and its trading subsidiaries, WSRA Promotions Ltd and WSRA Steam Rally Ltd (hereafter referred to as WSRA)

The purpose of the Data Protection Policy is to support the General Data Protection Regulation (2016), the Data Protection Act (2018), The Data Protection (Fundamental Rights and Freedoms) (Amendment) Regulations 2023 and all other relevant national legislation. We recognise data privacy as a fundamental right and embrace the principles of data protection by design and by default.

This policy covers our data protection principles and commitment to legislative compliance procedures for data protection by design and by default.

This policy includes in its scope all data which we process either in hardcopy or digital copy.

This policy applies to all staff, including temporary staff, volunteers and contractors.

### Data Protection Policy Principles

1. WSRA accepts the definition of Personal Data as information that relates to an identified or identifiable individual.
2. WSRA will be open and transparent with members, donors and everyone who interacts with the charity and its trading subsidiaries.
3. WSRA will establish and maintain policies to ensure compliance with the Data Protection Act 2018, the UK General Data Protection Regulation and all other relevant legislation.
4. WSRA does not sell, trade, or otherwise transfer to outside parties any personally identifiable information. WSRA may however, share information with other members of the West Somerset Railway family (WSRHT, WSR PLC and DEPG). WSRA may also share information with trusted third parties who assist us in operating our website, conducting and securing our business, or servicing you, so long as those parties agree to keep this information confidential. We may also release your information when we believe release is appropriate to comply with the law, or protect our or others' rights, property, or safety. Non-personally identifiable member/donor/customer information may be provided to other parties for marketing, advertising, or other uses.
5. Where consent is required for the processing of personal data WSRA will ensure that informed and explicit consent is obtained and documented in an appropriate format. Any individual can withdraw consent at any time through processes which are outlined at sign-up and in our communications.
6. WSRA will undertake periodic audits of our compliance with legal requirements.
7. WSRA acknowledges accountability in ensuring that personal data shall be:
  - Processed lawfully, fairly and in a transparent manner;
  - Collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes;
  - Adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed.
  - Accurate and kept up to date

- Kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed.
- Processed in a manner that ensures appropriate security of the personal data.

8. WSRA upholds the personal data rights outlined in the UK GDPR;

- The right to be informed;
- The right of access;
- The right to rectification;
- The right to erasure;
- The right to restrict processing;
- The right to data portability;
- The right to object;
- Rights in relation to automated decision making and profiling.

9. WSRA is not required to appoint a Data Protection Officer under the UK GDPR. WSRA supports all staff and volunteers with the necessary resources to carry out appropriate tasks and ensure that they can maintain Data Security.

#### **Underpinning policies & procedures**

Where appropriate this policy is underpinned by related internal policies for record keeping, network security, codes of conduct and business continuity.

#### **Data protection by design & by default**

The UK GDPR requires organisations to put in place appropriate technical and organisational measures to implement data protection principles effectively and safeguard individual rights. Data protection by design is about considering data protection and privacy issues upfront in everything the organisation does. WSRA will implement appropriate organisational and technical measures to uphold the principles of Data protection by Design and by Default. WSRA will integrate necessary safeguards to any data processing to meet regulatory requirements and to protect individual's data rights. This implementation will consider the nature, scope, purpose and context of any processing and the risks to the rights and freedoms of individuals caused by the processing.

WSRA will uphold the principles of data protection by design and by default from the beginning of any data processing and during the planning and implementation of any new data process.

WSRA ensures that, by default, personal data is only processed when necessary for specific purposes and that individuals are therefore protected against privacy risks. In all processing of personal data, WSRA uses the least amount of identifiable data necessary to complete the work it is required for and we only keep the information for as long as it is required for the purposes of processing or any other legal requirement to retain it.

#### **Responsibilities**

WSRA is not required to appoint a Data Protection Officer under the UK GDPR. The designated Data Security and Protection Lead is the WSRA General Manager who is responsible for ensuring compliance with the law and with the organisation's policies and procedures.

Policy Author	Jacquie Green – General Manager
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Date Revised by Trustee Mike Sherwood	08 April 2024
Date Implemented	14 March 2023
Review Interval	2 years
Next Review Due	April 2026