



EU General Data Protection Regulation Compliance (GDPR)

As at 25th May 2018 the club is required to meet the requirements of the GDPR and Data Protection Act (2018) regarding storage, privacy and security of membership data.

The EU General Data Protection Regulation (GDPR) replaces the Data Protection Directive 95/46/EC and was designed to harmonize data privacy laws across Europe, to protect and empower all EU citizens data privacy and to reshape the way organizations across the region approach data privacy. It will be incorporated in UK law and will remain in force after Brexit.

Why does the GDPR affect the MWMFC?

The club holds members' personal data. This is the reason why we are required to comply with the GDPR.

How can the MWMFC achieve compliance?

Appoint a committee member as our "Data Controller". He should review our present status and develop a privacy policy which meets the requirements of the GDPR, defines his own role and that of the Data Processors (see below). This would normally be the club secretary.

Appoint additional committee members as "Data Processors". These persons will have a requirement to access member data in order to carry out their duties to an extent defined by the data controller and according to our privacy policy. The membership secretary/treasurer would definitely have to take on this role.

Define any third parties that we pass data on to, the reasons why and provide a link to their privacy policy.

Ensure that **all** our members consent to their details (as defined in the Privacy Policy) being held and processed by the MWMFC to the extent defined in the privacy policy.

How do we do this?

At present our Membership Secretary is responsible for maintaining and securing the data. For many years he and his predecessor have simply used an Excel workbook which has been copied to committee members on request. This is certainly not allowable under the GDPR. Both because of concerns with the security of data and distribution of copies which are certainly uncontrolled.

This year, all member data has been transferred to the "membermojo.co.uk" (MM) club membership service. The data is held "in the cloud". MM have a comprehensive [privacy policy](#) which members are encouraged to view.

The MM system allows the Membership Secretary/Treasurer to record and process members' personal details and subscription records.

The committee is satisfied that the MM system meets our obligations under the GDPR for security of data under our direct control.

The GDPR regulations are not solely related to computerised or computer stored data. It applies equally to printed or any physical records. The storage of any such records has to be secure and controlled. Clearly it is unrealistic for the club to prove compliance with the requirements.

Therefore it is wholly unacceptable for club officers to hold either computerised records, or listings of members' personal details, except as provided for under this compliance statement and the club's Privacy Policy <<link>>.



EU General Data Protection Regulation Compliance (GDPR)

To which external parties does the MWMFC provide personal data?

The club is required to provide data to two third parties:

1. The Army Air Corps military authority

The club provides both a printed membership list and keyholders' list for military security compliance requirements.

2. The British Model Flying Association

It is a condition of our license to operate at Middle Wallop that the club is BMFA affiliated in order that the military authorities can be assured that £5M indemnity insurance is in place.

What are MWMFC members required to agree to?

It is required within the GDPR that consent be obtained to specified personal data being held together with details of any distribution to third parties.

The GDPR requirement for individuals to be able to receive details of personal data held by an organisation is satisfied by members being able to log in to the MM system and view their personal data to the full extent of that held by the MM system.

It is made clear to members that they implicitly agree to their data being stored in the MM system and passed on to the defined third parties as a condition of initial and continued membership. Should members disagree with this policy or any other element of this statement or the Privacy Policy, they are entitled to ask that their data be deleted. Should they make that request it will be acknowledged and carried out upon their agreement to their membership being terminated immediately and the return of their security pass to a committee member.

The extent of data held is defined in the privacy policy.

The club's web site at mwmfc.org.uk requires members to log in to enable access to certain sections. However no personal data beyond email addresses is held on the web server and thus the GDPR does not apply.

Signed by

Rob Ashley

Chairman of the Committee

8th August 2018