

CESC Data Protection Policy

Version 4

Updated November 2018

Revision Register				
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Purpose and Obligations

Purpose

1. This Data Protection Policy is provided to clearly set out procedures and measures that Constructing Excellence Sussex Club (CE Sussex Club, or CESC) and, by extension, its Committee Members take to ensure Our Members' Data is protected according to the General Data Protection Regulation (GDPR).
2. GDPR is intended to strengthen and unify data protection for all individuals within the EU.

Obligations

3. CESC are obliged to comply with GDPR and several steps have been taken to ensure compliance.
4. CESC take data protection extremely seriously. We will never share your information with any third party.

Sussex Club

5. Constructing Excellence Sussex Club:
 - 5.1. Is the Sussex-based, not-for-profit membership club of the National Constructing Excellence (CE) movement for sharing best-practice knowledge towards continuous improvement the construction industry.
 - 5.2. Is a professional, subscription-based, local club; the subscription fees pay for event hire, marketing costs, refreshments at the club events, and an Annual Members' Breakfast.
 - 5.3. Has Members that comprise its Membership as Sussex-based construction Professionals, Students, and Further and Higher Education Faculty and Staff.
 - 5.4. Maintains a Membership structure including Paying, Pay-as-you-go, and Free or Honorary Memberships, information about which can be obtained
 - 5.5. Has an Oversight Committee of at least one *Constructing Excellence* Regional Board Member and at least one *South East Centre for the Built Environment* (SECBE) Team Member.
6. Fundamental to the nature of a membership-based club is the need for the club management and administration to hold and process information (data) about its members.
7. As a subscription-based club, information is held to facilitate invoicing and receipt of membership subscription fees.
8. CESC holds and processes members' information for the purposes outlined in **Paragraph 14**.

Data Roles

Sussex Club Committee

9. CESC is managed and administered by a Committee comprised of highly experienced construction industry professionals, seeking to represent all aspects of the construction industry.

10. The Committee is selected by self-nomination based on 5-years' regular attendance at Club Events; nominations are then subject to selection voting at Committee Meetings and ratification voting at Club Annual General Meetings.
11. An updated list of the current Committee Members is kept on our website and can be found in this permanent location: <http://sussex.constructingexcellence.org.uk/membership/>

Data Controller

12. A Data Controller (either alone or jointly or in common with other persons on the committee) determines the purposes and manner or means of processing personal data. The roles undertaken are as follows:
 - 12.1. CESC is a Data Controller as a club.
 - 12.2. Three Committee Members are also Data Controllers:
 - 12.2.1. The Club and Events Coordinator; and
 - 12.2.2. the Club Treasurer.

Data Processor

13. A Data Processor is responsible for processing personal data on behalf of a controller. The roles undertaken are as follows:
 - 13.1. CESC is a Data Processor as a club.
 - 13.2. Five Committee Members are also Data Processors:
 - 13.2.1. The Membership Coordinator;
 - 13.2.2. the Club and Events Coordinator;
 - 13.2.3. the Club Treasurer;
 - 13.2.4. the Club Treasurer's Technical Assistant; and
 - 13.2.5. the Website, IT and Data Protection Coordinator.

The Data

The purposes for holding data, what data we hold, who holds it, and who has access to it

Purposes for holding data

14. CESC holds and processes members' information for the purposes of:
 - 14.1. Marketing our professional events (seminars, AGM, Breakfast, and construction site visits) to current members, prospective members, and non-member contacts;
 - 14.2. Club Messaging to inform our members of important club matters not related to events;
 - 14.3. Club Membership Subscription Fee Administration to issue Membership Subscription Fee Invoices and correspond with members regarding their payment and administration.

What data we hold

Master Contacts List

15. CESC currently hold the following information List about each individual Member in a Master Contacts:
- 15.1. Individual's name,
 - 15.2. Company,
 - 15.3. Company address for invoicing,
 - 15.4. Name of main contact who receives the invoice,
 - 15.5. E-mail address,
 - 15.6. Business phone number (and/or any other phone number when offered)
 - 15.7. Individual's membership status (as paid, unpaid, or prospective based on expression of interest),
 - 15.8. Role (i.e. as Committee Member, Honorary Member, Non-Member or Potential Member),
 - 15.9. Date when any information is updated/amended.

Email List for Eventbrite Ticketing/Registration

16. CESC uses Eventbrite web-based event management platform to manage registration and sell non-member tickets to our events. CESC currently hold the following information about each individual Member in a separate list specific for event marketing/communications. This separate list is taken from the current Master Contacts List for uploading to the Eventbrite platform in simplified form according to Eventbrite's formatting requirements, as follows:
- 16.1. Individual's First Name and Surname
 - 16.2. E-mail address.
17. The details uploaded to Eventbrite are used only for the emailing all members and prospective members on the Master Contacts List, and are therefore deleted from the Eventbrite website yearly, immediately after the Annual General Meeting (AGM).
18. Your contact with Eventbrite as a platform is managed when Members register with the platform. Consent for Eventbrite is given and managed through their website platform Account page, [CLICK HERE](#), through which anyone can manage their contact preferences.

CESC Gmail Events Email Account

19. CESC maintain a dedicated email account through Gmail (cesussexevents@gmail.com) to which Members can email if they have problems or queries about any of the events, which is included with the Eventbrite listing and emailed Invitations.
20. Gmail automatically populates a contact list based on emailed Order Notifications (ticket reservations and purchases) for the events marketed through Eventbrite only, and via direct email from Members with problems or queries.
21. Gmail's automatically populated contact list is not used by CESC and is therefore deleted on an annual basis by the Club Data Protection Coordinator immediately after the AGM.

Guest Lists

22. To facilitate knowledge-sharing and best-practice between Club Members, a Delegates List is emailed to all attendees registered through Eventbrite.
23. The following information is contained on those lists, emailed as PDF attachments directly from the Club and Events Coordinator's business email address:
 - 23.1. Event Name,
 - 23.2. Event Location,
 - 23.3. Event date
 - 23.4. Delegates, Apologies & Guest Students:
 - 23.4.1. Surname and First Name
 - 23.4.2. Company Name

What data we DO NOT hold

Sensitive Personal Data

24. CESC do not hold any Sensitive Personal Data or Special Categories of Personal Data, including:
 - A. Racial or ethnic origin
 - B. Sexual orientation
 - C. Political opinions
 - D. Data concerning health
 - E. Religious or philosophical beliefs
 - F. Trade union membership
 - G. Processing of genetic data, biometric data for uniquely identifying a natural person

Third-Party Email Software

25. Emails sent from Committee Member's company email accounts are done so through proprietary third-party email software. It is understood that proprietary software, such as Mozilla Thunderbird, Apple Mail, Microsoft Outlook, or eM Client, do not automatically populate contact lists that are accessible to software users.
26. However, to ensure Data Protection, Committee Members are asked annually to check and delete any automatically populated lists in their software.
27. Previously, CESC has used MailChimp web-based email contact service. Based on the procedures outlined above, the MailChimp service is redundant and the account and all data was permanently deleted on 3rd June 2018.

Who holds data and who has access to it

Data Holders

28. As per above-mentioned section entitled **Data Roles**, Paragraphs 12 and 13 outlined five Committee Members who hold Member's Data.
29. Data is held on the basis of the Data Role the Committee Member holds, which is directly related to their Role as a Committee Member, as outlined in Paragraphs 9-13.

Master Contacts List

30. The Master Contacts List is held by:

- 30.1. The Club and Events Coordinator for marketing and membership coordination;
- 30.2. The Club Treasurer and the Club Treasurer's Technical Assistant for Membership Subscription Fee Invoicing, Payment Collection, and administration.

Email List for Eventbrite Ticketing

31. The Email List for Eventbrite is held by:

- 31.1. The Club and Events Coordinator for event marketing and event coordination;
- 31.2. The Website, IT and Data Protection Coordinator for Eventbrite website creation, management, maintenance and administration.

CESC Gmail Events Email Account

32. Gmail Events Email Account is managed and accessible by:

- 32.1. The Club and Events Coordinator for event marketing and event coordination, including management, maintenance and administration;
- 32.2. The Website, IT and Data Protection Coordinator for management, maintenance and administration.

Data Accessibility

Master Contacts List

33. The Master Contacts List is encrypted and password-protected. It is held on password-protected computers of the Data Holders identified in Paragraph 30.

Email List for Eventbrite Ticketing

34. The Email List for Eventbrite is encrypted and password-protected. It is held on password-protected computers of the Data Holders identified in Paragraph 31.

CESC Gmail Events Email Account

35. Gmail Events Email Account is encrypted and password-protected. It is held on password-protected computers of the Data Holders identified in Paragraph 32.

Data Sources

Where the data came from, how is it up-dated, how regularly it is up-dated

Data Sources

Where the data comes from and How data is acquired

36. The Data described in Paragraphs 15 to 23 comes from three sources, as follows:

- 36.1. Data is supplied directly from the Member themselves;
- 36.2. Data is supplied via another Member, based on a prospective Member's Expression of Interest to become a Member of the Club and/or to attend an upcoming event;
- 36.3. Data is provided by non-members themselves, based on their Expression of Interest attend an upcoming event or become members.

37. *Item not used.*

How and when data is up-dated

General Data Change Procedure

38. If and when Individuals on our Contact Lists wish to change their preferences on how We contact them, or wish to unsubscribe from Our contacts list, they are given various opportunities to inform the Club, as described below.
39. All requests to change or unsubscribe are passed on to the Club Coordinator, who changes or deletes their information from the main and Eventbrite contact lists.
40. If an event or Membership Fee billing is in progress, the Club Coordinator emails the Website/IT Coordinator or the Club Secretary, respectively, to request the change.
41. Once the Coordinator or Secretary have confirmed that the change has been made, then the Individual is emailed to be informed that their information has been updated or permanently deleted as requested.

Change Request made Face-to-Face at Events

42. Bi-annually at the end of two key events, the November Membership Drive Event and the AGM, Members are reminded by the Event Chair to contact the Club Coordinator or any Committee Member at the event or via email. Each request will be addressed as per Paragraphs 38 to 41.

Change Request made through Eventbrite

43. Eventbrite has an 'unsubscribe' facility (link to a webpage) on the footer of all Event Invitation emails.
44. For those Individuals who 'unsubscribe', the Events and Club Coordinator will contact the Individual each time via email or phone to check with them any request to 'unsubscribe', prior to the Data Holders fulfilling their request. Each request will be addressed as per Paragraphs 38 to 41. In the event the Club Coordinator cannot make contact to check the individual's preference, either by phone or e-mail up to a maximum of 3 attempts, the individual will be removed from all CE Sussex mailing lists.
45. To completely remove an Individual's name and email addresses from the Club contact databases, so the Club stop contacting them altogether, all e-mail communications contain a Footer instruction (see Appendix 1). This instruction asks an Individual to contact the Club and Events Coordinator via email to request their information is removed.
46. All current and previous members will remain on the Club contact databases (Master Excel list) until a Member e-mails to specifically to request removal, or we know the e-mail is no longer valid via automated undeliverable messages or direct contact from Individuals themselves.

Change Request made via Email

47. Change requests received directly via email will be addressed as per Paragraphs 38 to 41.

Data Management and Administration

What we do with the data, to whom we give the data, for how long we hold it, who requires notifications

Data transfer

48. We only hold and process data for the purpose for which it is collected (see Paragraph 14). This means that if We collect a name and contact details (Data) of an Individual for Membership, We do not use that information to allow anyone, whether affiliates or umbrella organisations, to contact a Member for any purposes, whether marketing or information.
49. CESC or any Committee Member *will not* transfer any Individual's Data to any other Individual or Organisation without the express written consent of that Individual.

Third-Party or Umbrella Organisation Access Requests

50. CESC and its Committee Members have not permitted, and will not permit, any access from Third Parties or Umbrella Organisations, such as Constructing Excellence national organisation, the BRE, or regional or local clubs, for any reason.
51. Under no circumstances will any Third-Party or Umbrella Organisation Access Request be accepted or entertained.

Subject Access Requests

52. Subject Access Requests, or requests for copies of an Individual's own personal data, will be responded to within one calendar month at no cost to the requesting party, as required by GDPR.

Data retention

53. Data is retained for the purposes outlined in under Paragraph 14.
54. CESC and its Committee Members do not keep data for longer than is necessary for the purpose for which it was collected under Paragraph 14. We inform people how long We will keep their personal data and We do not keep it indefinitely.
55. Data is retained for the time periods as follows:
- 55.1. Data is held for Members for as long as an Individual remains a paid Member.
 - 55.2. Data is held for Non-member Individuals for as long as they have consented when their information was given. If no period of consent was given, then the Procedures outlined in Paragraphs 38 to 47 will be applied.
56. With respect to Data Retention, the Procedures for updating Data, outlined in Paragraphs 38 to 47, will be applied as described.

ICO Notifications

57. The Information Commissioners Office (ICO) is the UK's independent authority set up to uphold information rights in the public interest, promoting openness by public bodies and data privacy for individuals.
58. Under the GDPR, individuals and organisations longer have to notify the ICO as a Data Controller (or Processor).

Data Security

Where we hold data, what data we encrypt/password protect

59. Data Security is taken very seriously and has been described according to Data type in the Section entitled Data Accessibility, in Paragraphs 33 to 35.

Permissions

Permissions from our members to do what we do with their data, when that permission was (consent) given

60. Permissions to use and retain an Individual's data is given as described in Paragraphs 5 to 8; Data Sources Paragraphs 36 to 47.

Policy Review and Updating

61. Compliance with the Policy is reported at Committee Meetings as data-related events occur.

62. This Data Protection Policy will be reviewed annually at the Committee Meeting nearest the AGM.

63. This Data Protection Policy will be Updated as necessary to comply with prevailing Regulation. Updates will be voted on at the Committee Meeting immediately following the Policy Update.

Disclaimer and Notifications

64. This Policy was written in Good Faith.

65. This Policy has been reviewed and agreed by the five Data Role holders and the Committee Chairman.

66. This Policy has been discussed by the Committee Members present at the June 2018 Committee Meeting.

67. This Policy has been voted into use by the Committee Members present at the September 2018 Committee Meeting.

68. This Policy and any updates are available on the Club website, accessible by [CLICKING HERE](#).