

Data protection policy

As approved by TransWilts CIC Board 29.8.2015

1. TransWilts CIC (TW) holds three types of information which are covered by this policy
 - **organisational** information – publicly available information about organisations and some individuals within organisations
 - **personal** information – information about individuals and members such as names, addresses, job titles
 - **sensitive** personal information – in general this kind of information is only held about employees. There are, however, instances where sensitive information is held about other people. For example information about members dietary requirements at a Conference might allow a person's religion to be deduced.

Note that Information about organisations is not covered by the Data Protection Act.

2. TW will not hold information about individuals and members without their knowledge and consent.
3. TW will only hold information for specific purposes. It will inform members and individuals what those purposes are and will inform them if those purposes change. Application for membership provides consent for holding the information contained in the membership form for the purposes of administering the membership package.
4. Information will not be retained once it is no longer required for its stated purpose. Information for lapsed membership will be retained for a reasonable time, nominally three years, for the purposes of processing potential renewals of membership. Past members can request removal/unsubscribe from mailing lists.
5. TW will seek to maintain accurate information by creating ways in which members can update the information held. Email notifications should be sent to the Membership Secretary membership@transwilts.org for action.

6. Members information will be retained within TW and will not be given to third parties. Members will only receive newsletters and notifications from TW that will communicate on the activities and purposes of TW and on related local transport topics.
7. Members and Individuals are entitled to have access to information held about them by TW.
8. Information about members will not be disclosed to other organisations or to individuals who are not members of TW staff or Board except in circumstances where this is a legal requirement, where there is explicit or implied consent, or where the information is publicly available elsewhere.
9. TW has procedures for ensuring the security of all personal data. Paper records containing confidential personnel data are disposed of in a secure way. Electronically held personal data will be protected from non authorised access.
10. The Membership Secretary is responsible to the TW Board for the control and protection membership individual data.
11. There may be situations, where TW works in partnership with other organisations, such as stakeholders and sponsors, which may require some data sharing. Personal data will not be shared, but overall statistics, for example on TW membership numbers may be shared.
12. TW staff, whether employees or volunteers, will be given training on TW data protection policy and procedures.
13. TW Board will carry out regular reviews of its data protection policy and procedures.

