



## Old Ruymian Club

*The Club for 6<sup>th</sup>-Formers, Former Pupils, Current and Former Staff of Chatham House, Clarendon House and Chatham and Clarendon Grammar School.*

### Old Ruymians Club Statement of Compliance with the Data Protection Act 1998 and GDPR [May 2018]

When OR Club members enrol essential information is stored on the club database and, from time to time, that information may be updated. The OR Club is a private club maintained by its supporters. It is not profit making and any money on account is for the exclusive use of the club to support events arranged for club members or for the support of Chatham House and Clarendon House Grammar Schools.

Regarding Data Protection Act 1989, the OR Club data controller is not registered with the ICO and we believe qualifies for exemption. The Act defines the requirement for exemption as complying with the following:

1. Only process information necessary to establish or maintain membership
2. Only process information necessary for the administration of membership and the members of organisations with whom there is regular contact.
3. Only share information with the permission of members.
4. Only keep the information while the individual is a member or supporter or as long as necessary for member or supporter administration.

The club committee has the opinion that the OR Club qualifies for exemption meeting the 4 requirements listed, the OR Club is ICO exempt and therefore has not been registered. Individual OR Club members and in particular individual OR Club committee members are each responsible for the data that they have saved/stored on any digital device [e.g. digital phone or computer]. Stored data is considered to be private on the understanding that it is not sold or passed to a third party. Any access to private or privileged information may be unlawful within the definition of the Data Protection Act 1998.

There is a shared responsibility by all members of The Old Ruymians Club and in particular all committee members who may have access to confidential records with information of members personal details.

If you were an OR Club committee member until recently and you were part of the communication between committee members [email traffic between committee members is not part of the stored club data and will not be considered as belonging to the club] any stored information about individual members that was recorded by individual committee members and that was not obtained without the expressed agreement of the individual; may be classified as an illegal act within the definition of the Data Protection Act 1998.

The OR Club urges all retiring or resigned committee members to delete all electronically stored files and return any associated hard copy files and information or documents and any other associated documents or objects that are the property of the OR club to return the materials and documents to the OR club secretary for appropriate storage.

Note that the following rules apply to all information that is retained in the OR Club database:

- A. Its use is only for lawful purposes
- B. We collect only necessary information
- C. Stored data is relevant and up to date
- D. Data is held only for as long as necessary
- E. Subjects have full access
- F. It is secure

Other Items:

1. Emails relating to club activities, news items or any relevant communication are not stored in the OR club data base and are not considered as part of the stored information governed by the Data Protection Act 1998.
2. Minutes of OR club committee meetings and other documents including some emails are stored as printed documents, they are not part of the OR club data base and are not subject to the Data Protection Act 1998.
3. All records either electronic or printed that form part of the historic archive of the OR Club may be outside of the Data Protection Act 1998, will remain the property of the OR club and any items in the possession of club members [including expired membership] must be returned to the OR Club.