Quick Guide to:
General Data Protection Regulations (GDPR)
April 2018
Introduction

As of 25 May 2018 the General Data Protection Regulations (GDPR) supersedes the Data Protection Act 1998 (DP98). This has significant implications for how CAMRA holds personal data within its branches.

All companies and organisations that use personal data will have to abide by the new legislation, which sets out how we can collect and use data.

This document is designed to give a quick overview of GDPR with a list of Dos and Don’ts and frequently asked questions. A more detailed set of branch guidelines, referred to in this document, is available online.

Ian Hill
National Director

Dos and Don’ts

The below is a quick overview of GDPR Dos and Don’ts. If you have any concerns either refer to the GDPR branch guidelines or contact dataprotection@camra.org.uk.

Do

- Check to see if you have any existing data lists as a branch. If yes, and you no longer have any use for them, please delete them. If your list is of branch members, please delete them securely.

- Ensure that if you hold any personal data online the file is password protected. If you hold data in paper format it needs to be securely stored. Please check the storing data section of the GDPR Branch Guidelines.

- Use the CommsTool email facility when emailing your branch members.

- Use the GDPR branch guidelines if you do need to store personal data so that you do so in accordance with legislation.

- Refer to the GDPR branch guidelines if you are using your own email lists.
Tell people in a fair processing notice why you are collecting their data, what you will use it for and how long you will keep it. They have to give you their consent. See Branch GDPR Guidelines for full details on what to do.

Contact dataprotection@camra.org.uk if you have any concerns.

Don’t

Use data lists if you do not know where the data came from or you do not have consent to use it based on the Privacy Impact Assessment. See GDPR Branch Guidelines for details.

Send emails without using the BCC section of an email to hide the addresses if you are not using the Comms Tool.

Ignore possible issues or breaches in data protection. Please let us know ASAP by contacting dataprotection@camra.org.uk. We have 72 hours to inform the ICO of any breaches.

Collect personal data without getting consent.

Frequently Asked Questions

You can find detailed branch guidelines with an overview of GDPR on the members’ website. Some frequently asked questions that we have received can be found below, which will be updated as more questions come through.

Why is it important?

- It is the law and CAMRA could be fined if we do not apply the regulations to our working practices.
- It provides confidence to our membership and customers that CAMRA is a responsible organisation that cares about data privacy.

What does it mean to you?

- Branches will need to abide by the guidance given. Tools provided should be used such as the membership system and Comms Tool to minimise the risk of unlawful data processing or loss.

Will GDPR still be in place post Brexit?
Quick Guide to GDPR

- This is European legislation but it will unaffected by Brexit. If the UK opted out of the legislation then we would not be able to communicate outside of our own borders within the EU without serious implications for data transfers.

I have an existing list of personal data. What do I do?

- You need to assess why you have the data by conducting a Privacy Impact Assessment. If the data is still needed then ensure it is managed in accordance with the GDPR principles. If it is not needed then securely delete it.
- All communication using the existing data must have notices on them informing individuals why they are being contacted and how they can opt out of future communications.
- If you do not know why you have the data or it is over 12 months old and there is not a clear purpose for keeping then please securely delete it. Ensure it is deleted completely and not stored in the computer bin.

Does CAMRA provide a secure email solution that will comply with GDPR?

- Yes, there is an email system called the Comms Tool, which all branches have access to, to send emails to members.

What services should we be using for storing emails on?

- Do not store email lists on email systems. If you have collected a data set of emails store it securely e.g. a password protected file.

How long should emails be kept on our email server?

- Delete the email after use. It is advisable to use the Comms Tool.

If I am collecting data do we need to state for how long the data will be kept?

- When collecting data online or by paper you should provide them with a fair processing notice which details how you will use their data and how long you will keep it. You should be asking them to consent at this point. Please check the GDPR branch guidelines.

How do we deal with Data Subject Access* requests?

- Pass them to dataprotection@camra.org.uk and provide the information as outlined in the guidance.

*Freedom of Information requests are for Local Authorities and government bodies. We are not subject to those requests.

Can branches request personal data from the office?

- Yes, but there must be a necessary reason for the data to be supplied. It will be sent electronically in a password protected file. If the data is available by a system such as the membership system reporting tool then you will be asked to access it that way.

Can we still collect data?

- Yes. If there is a necessary reason to collect data make sure you undertake a Privacy Impact Assessment and then abide by the GDPR principles.
Check out the “Collecting and Processing Personal and Sensitive Personal Data” section of the Branch Guidelines to GDPR. Anyone giving you data needs to know why they are giving it to you, how it will be used, how long it will be kept and that their data will be kept private and secure.

- When data is collected a purpose for the collection should be assigned to it and clearly communicated to the individual providing their personal data. You must use the data only for the purpose it was collected.

**How much data are we allowed to collect?**

- You must assess what data you require before you collect it. Use the Privacy Impact Assessment and apply the GDPR principles. It is not how much we can collect but how much is needed to meet the purpose of why we are collecting it in the first place.

**Is there an official process for this?**

- Yes. If you follow the section on Impact Assessments in the “Collecting Personal and Sensitive Personal Data” section in the GDPR branch guidelines you can follow a quick assessment process.

**Do we need to register with the ICO to process this information?**

- CAMRA is a registered Data Controller. Branch communications are covered under this registration so there is no need to register with the ICO.

**Do we need to send any data we collect to CAMRA? If so, how do we send this securely? What information is required? Why is it needed?**

- You do not need to send all data you collect to the offices as long as you are collecting data in accordance with the GDPR.

**What steps have CAMRA taken to prepare for GDPR?**

- CAMRA has been working on compliance with Data Protection and now GDPR for a number of years. A staff member was initially trained as a Data Protection officer five years ago and continues to undertake refresher training.
- We have worked with the 2016 legislation in a timely fashion to be ready for the 25 May 2018 deadline.
- We have created an internal data asset, reviewed our existing processes, developed a new privacy policy, changed our internal communication tools and, developed new member preferences.

**What responsibility will CAMRA take if a branch is prosecuted for non-compliance?**

- A branch will not be prosecuted, unless the activity undertaken had criminal intentions, in which case an individual may well be prosecuted. In all other cases, CAMRA would be prosecuted centrally.

**If I have a question about GDPR who do I ask?**

- Contact dataprotection@camra.org.uk