

Data Protection Policy

The New Horizons Camping Club

Date	January 2025
------	--------------

Definitions

Club	Means The New Horizons Camping Club (NHCC)
UK GDPR DPA 2018	<p>Primary legislation - The UK General Data Protection Regulation (UK GDPR) is a UK law that took effect on 01 January 2021 and sets out the key principles, rights and obligations for most processing of personal data in the UK, except for law enforcement and intelligence agencies. It is based on the EU GDPR (General Data Protection Regulation (EU) 2016/679), which was applied in the UK before that date, with some changes to make it work more effectively in a UK context.</p> <p>The Data Protection Act (DPA) 2018 sets out the framework for data protection law in the UK. It was amended on 01 January 2021 by regulations under the European Union (Withdrawal) Act 2018, to reflect the UK's status outside the EU. It sits alongside and supplements the UK GDPR - for example by providing exemptions. It also sets out separate data protection rules for law enforcement authorities, extends data protection to some other areas such as national security and defence, and sets out the Information Commissioner's functions and powers</p>
Responsible Persons	Chair – Angela Cliff Group Secretary – Sheila Scott
Register of Systems	Means a register of all systems or contexts in which personal data is processed by the New Horizons Camping Club (NHCC).

1. Data protection principles

The New Horizons Camping Club (NHCC) is committed to processing data in accordance with its responsibilities under the UK GDPR, Data Protection Act 2018 and all other current data protection and security legislation

Article 5 of GDPR requires that personal data shall be:

- a. processed lawfully, fairly and in a transparent manner in relation to individuals;
- b. collected for specified, explicit and legitimate purposes and not further processed

Data Protection Policy

The New Horizons Camping Club

in a manner that is incompatible with those purposes; further processing for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes shall not be considered to be incompatible with the initial purposes;

- c. adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed;
- d. accurate and, where necessary, kept up to date; every reasonable step must be taken to ensure that personal data that are inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay;
- e. kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed; personal data may be stored for longer periods insofar as the personal data will be processed solely for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes subject to implementation of the appropriate technical and organisational measures required by the GDPR in order to safeguard the rights and freedoms of individuals; and
- f. processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures.”

2. General provisions

- a. This policy applies to all personal data processed by the Club
- b. The Responsible Person (the Chair) shall take responsibility for the Club's ongoing compliance with this policy.
- c. This policy shall be reviewed at least annually.

3. Lawful, fair and transparent processing

- a. To ensure its processing of data is lawful, fair and transparent, the Club shall maintain a Register of Systems.
- b. The Register of Systems shall be reviewed at least annually.
- c. Individuals have the right to access their personal data and any such requests made to the club shall be dealt with in a timely manner. The responsible person to contact with any queries will be the **Membership** Secretary

4. Lawful purposes

- a. All data processed by the Club must be done on one of the following lawful bases: consent, contract, legal obligation, vital interests, public task or legitimate interests ([see ICO guidance for more information](#)).
- b. The Club shall note the appropriate lawful basis in the Register of Systems.
- c. Where consent is relied upon as a lawful basis for processing data, evidence of opt-in -consent shall be kept with the personal data.
- d. Where communications are sent to individuals based on their consent, the option for the individual to revoke their consent should be clearly available and systems should be in place to ensure such revocation is reflected accurately in the Club's

Data Protection Policy

The New Horizons Camping Club

systems. Should consent be withdrawn it will be impossible for membership to the NHCC to be continued.

5. Data minimisation

- a. The Club shall ensure that personal data is adequate, relevant and limited to what is necessary in relation to the purposes for which it is processed.
- b. NHCC officers and Committee members will have access to information held only in relation their role on a 'need to know' basis.

6. Accuracy

- a. The Club shall take reasonable steps to ensure personal data is accurate.
- b. Where necessary for the lawful basis on which data is processed, steps shall be put in place to ensure that personal data is kept up to date.
- c. Membership is renewed annually, and renewing members are asked to check and reconfirm their contact details. It is understood that use of personal data by the club is on a rolling consent, until instructed otherwise.

7. Archiving / removal

- a. To ensure that personal data is kept for no longer than necessary, the Club shall put in place an archiving plan for each area in which personal data is processed and review this process annually.
- b. The archiving plan shall consider what data should/must be retained, for how long, and why.

8. Security

- a. The Club shall ensure that personal data is stored securely using modern software that is kept up to date.
- b. Access to personal data shall be limited to personnel who need access and appropriate security should be in place to avoid unauthorised sharing of information.
- c. When personal data is deleted, this should be done safely such that the data is irrecoverable.
- d. Appropriate back-up and disaster recovery solutions shall be in place.

9. Breach

In the event of a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data, the NHCC shall promptly assess the risk to people's rights and freedoms and if appropriate report this breach to the ICO ([more information on the ICO website](#)).

Review Date January 2026