

BES data protection policy

Introduction

The British Epigraphy Society (BES) is a learned society and a registered charity and it exists to support its members and the public in the advancement of education, specifically in the field of epigraphy.

The personal data that BES processes to provide these services relates to its members and other individuals as necessary, including former members, and officers and staff of AIEGL and other charitable, cultural and educational institutions (“educational staff”).

This policy sets out BES’s commitment to ensuring that any personal data, which BES processes, is handled in compliance with data protection law. ‘Data Protection Law’ includes the General Data Protection Regulation 2016/679; the UK Data Protection Act 2018 and all relevant EU and UK data protection legislation.

BES processes the personal data of members and professional specialists in epigraphy from all over the world, including the personal data of some non-EU citizens, but is committed to ensuring that all the personal data that it processes are handled in accordance with data protection law. BES ensures that good data protection practice is imbedded in the culture of our Society, with particular regard to the management of the Society’s activities by the Society’s Steering Committee.

Scope

This policy applies to all personal data processed by BES and is part of BES’s approach to compliance with data protection law. All BES officers and steering committee members are expected to comply with this policy.

Data protection principles

BES complies with the data protection principles set out below. When processing personal data, it ensures that:

- it is processed lawfully, fairly and in a transparent manner in relation to the data subject (‘lawfulness, fairness and transparency’)
- it is collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes (‘purpose limitation’)
- it is all adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed (‘data minimisation’)
- it is all accurate and, where necessary, kept up to date; reasonable steps will 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 (‘accuracy’)
- it is 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 (‘storage limitation’)

- it is 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 ('integrity and confidentiality')

BES will facilitate any request from a data subject who wishes to exercise their rights under data protection law as appropriate, communicating in a concise, transparent, intelligible and easily accessible form and without undue delay.

Process/procedures/guidance

BES will:

- ensure that the legal basis for processing personal data is identified in advance and that all processing complies with the law
- not do anything with your data that you would not expect given the content of this policy and the privacy notice
- ensure that appropriate privacy notices are in place advising members and others how and why their data is being processed, and, in particular, advising data subjects of their rights
- only collect and process the personal data that it needs for purposes it has identified in advance
- ensure that, as far as possible, the personal data it holds is accurate, or a system is in place for ensuring that it is kept up to date as far as possible
- only hold onto your personal data for as long as it is needed, after which time BES will securely erase or delete the personal data – BES's data retention policy sets out the appropriate period of time
- ensure that appropriate security measures are in place to ensure that personal data can only be accessed by those who need to access it and that it is held and transferred securely

BES will ensure that all who handle personal data on its behalf are aware of their responsibilities under this policy and other relevant data protection and information security policies.

Breaching this policy may result in disciplinary action. Obtaining (including accessing) or disclosing personal data in breach of BES's data protection policies may also be a criminal offence.

Data Subject Rights

BES has processes in place to ensure that it can facilitate any request made by an individual to exercise their rights under data protection law.

All requests will be considered without undue delay and within one month of receipt as far as possible.

Subject access: the right to request information about how personal data is being handled, including whether personal data is being processed and the right to be allowed access to that data and to be provided with a copy of that data along with the right to obtain the following information:

- the purpose of the processing
- the categories of personal data
- the recipients to whom data has been disclosed or will be disclosed
- the retention period
- the right to lodge a complaint with the Information Commissioner's Office
- the source of the information if not collected direct from the subject

Rectification: the right to allow a data subject to rectify inaccurate personal data concerning them.

Erasure: the right to have data erased and to have confirmation of erasure, but only where:

- the data is no longer necessary in relation to the purpose for which it was collected, or
- where there is no legal basis for the processing

Restriction of processing: the right to ask for certain processing to be restricted in the following circumstances:

- if the accuracy of the personal data is being contested, or
- if our processing is unlawful but the data subject does not want it erased, or
- if the data subject has objected to the processing, pending verification of that objection

Data portability: the right to receive a copy of personal data which has been provided by the data subject and which is processed by automated means in a format which will allow the individual to transfer the data to another data controller.

Object to processing: the right to object to the processing of personal data relying on the legitimate interests processing condition unless BES can demonstrate compelling legitimate grounds for the processing which override the interests of the data subject.

Responsibility for the processing of personal data

The officers and steering committee members of BES take ultimate responsibility for data protection.

If you have any concerns or wish to exercise any of your rights under the GDPR, then you can contact the Officer charged with oversight of the Society's data protection at the following address:

Name: Dr. Nicholas Milner

Address: BES, c/o 44 Rectory Green, Beckenham, BR3 4HX, UK.

Monitoring and review

This policy was created on 25 May 2018 and shall be regularly monitored and reviewed, at least every two years.