



The charity that supports the RAF family

## **EDINBURGH, LOTHIANS and BORDERS BRANCH**

*(a charity registered in Scotland No: SC009110)*



## ***GENERAL DATA PROTECTION REGULATION 2018 (GDPR)***

### **BRANCH DOCUMENTATION**

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## 1. CONTACT DETAILS OF ORGANISATION

Edinburgh, Lothians and Borders Branch – RAF Association

contact via:

Bob Bertram MBE

Branch Chairman/Trustee

Tel: 07706648438

email: [chairman@edinburghrafa.org.uk](mailto:chairman@edinburghrafa.org.uk)

## 2. BASIS OF BRANCH DATA PROTECTION POLICY & PROCESSES (GDPR)

Article 5 of the 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 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.”

## ASSESSMENT

The Edinburgh, Lothians and Borders Branch of RAFA Committee/Trustees

understand the importance of data protection and the impact it can have on individuals and organisations. The Branch Trustees accept their responsibilities under DPA legislation and undertake to comply with the legislation, guidance/good practice; and in compliance with the RAF Association Personal Data Protection Policy and Standard Operating Procedures.

### **3. LAWFUL BASIS FOR PROCESSING (AND SHARING)**

The lawful bases for processing are set out in Article 6 of the GDPR. At least one of these must apply whenever you process personal data:

- (a) Consent: the individual has given clear consent for you to process their personal data for a specific purpose.
- (b) Contract: the processing is necessary for a contract you have with the individual, or because they have asked you to take specific steps before entering into a contract.
- (c) Legal obligation: the processing is necessary for you to comply with the law (not including contractual obligations).
- (d) Vital interests: the processing is necessary to protect someone's life.
- (e) Public task: the processing is necessary for you to perform a task in the public interest or for your official functions, and the task or function has a clear basis in law.
- (f) Legitimate interests: the processing is necessary for your legitimate interests or the legitimate interests of a third party unless there is a good reason to protect the individual's personal data which overrides those legitimate interests. (This cannot apply if you are a public authority processing data to perform your official tasks.)

#### **ASSESSMENT**

The Branch Trustees have assessed the relevant lawful basis for processing; and have concluded that the following apply:

Consent – for Non-Members

Contract i.e. annual undertaking contract between branch & Area Data Controller & if applicable inter branch between Controller and designated Processor (if not same)

Legal Obligation i.e. individual donations Gift Aid & requirements of charity law

Legitimate Interest

#### 4. DATA PROCESSING IMPACT ASSESSMENTS (DPIA)

The GDPR includes a new obligation to conduct a DPIA for types of processing likely to result in a high risk to individuals' interests.

Types of processing that automatically require a DPIA:

- Systematic and extensive profiling with significant effects:
- Large scale use of sensitive data:
- Public monitoring:
- New technologies: processing involving the use of new technologies, or the novel application of existing technologies (including AI).
- Denial of service: Decisions about an individual's access to a product, service, opportunity or benefit which is based to any extent on automated decision-making (including profiling) or involves the processing of special category data.
- Large-scale profiling: any profiling of individuals on a large scale.
- Biometrics: any processing of biometric data.
- Genetic data: any processing of genetic data, other than that processed by an individual GP or health professional for the provision of health care direct to the data subject.
- Data matching: combining, comparing or matching personal data obtained from multiple sources.
- Invisible processing: processing of personal data that has not been obtained direct from the data subject in circumstances where the controller considers that compliance with Article 14 would prove impossible or involve disproportionate effort.
- Tracking: processing which involves tracking an individual's geolocation or behaviour, including but not limited to the online environment.
- Targeting of children or other vulnerable individuals: The use of the personal data of children or other vulnerable individuals for marketing purposes, profiling or other automated decision-making, or if you intend to offer online services directly to children.
- Risk of physical harm: Where the processing is of such a nature that a personal data breach could jeopardise the [physical] health or safety of individuals.

#### ASSESSMENT

Having looked at all the types of processing that might result in a high risk to individual's interests; the Branch Trustees have concluded that a DPIA is not relevant at this time, but this will be re-assessed during any future Review.

## 5. PURPOSES OF PROCESSING

For Branch Members – this is required to keep members up to date with branch matters i.e. Branch Governance, Newsletters, RAFA events, Branch Meetings, Social Events and the Annual General Meeting.

For Non-Members this is required to keep those who have expressed an interest in what we do informed. This group also includes “Branch Helper/Visitor(TLC)” contacts.

### ASSESSMENT

For this group; the Trustees have agreed that the Branch should register with the Information Commissioner as a “Data Controller”.

## 6. CATEGORIES OF INDIVIDUALS AND CATEGORIES OF PERSONAL DATA

For Branch Members – this data will include Membership Number, Name, Address, Phone Number (if supplied), Email Address (if supplied), Original Membership start date, Expiry date of current membership subscription and type of membership i.e. Ordinary (Full), Associate, Life, Honorary or Serving.

For Non Members – this information can include Email Addresses, Postal Addresses and Telephone Numbers.

## 7. DATA PROCESSOR OR DATA CONTROLLER ?

Personal data

The GDPR applies to ‘personal data’ meaning any information relating to an identifiable person who can be directly or indirectly identified in particular by reference to an identifier.

The GDPR applies to ‘controllers’ and ‘processors’.

- a controller determines the purposes and means of processing personal data.
- a processor is responsible for processing personal data on behalf of a controller.

### ASSESSMENT

The Branch Trustees, having assessed our use of data and how we process it; have decided that “for Members the Branch will be a Data Processor and for Non-Members a Data Controller “. In addition, the Trustees assess “Branch Partners” i.e. RAF Air Cadets, 603 RAF Reserve Squadron, Church of the Good Shepherd Murrayfield Edinburgh and local Veterans Breakfast Clubs (and similar) as “organisational entities” and therefore not relating to an “identifiable person”.

## **8. OTHER DATA PROCESSORS OR DATA CONTROLLERS**

The “Scotland & NI Area of RAFA” is Data Processor/Controller for Membership purposes; as is “The RAF Association Headquarters in Leicester”.

## **9. BRANCH NOMINATED DATA PROCESSOR / DATA CONTROLLER**

For Membership purposes the Branch will be a Data Processor and for Non-Members a Data Controller. The nominated lead for these will be “Brian Fox, the Branch Membership Secretary”. In addition; the Branch Data Processor/Controller will also be deemed the branch “Data Extractor” i.e.

“Data Extractor: The person who takes data from data sources like the database, which may then be used for further activity. For example, the Membership Support Officer running a report to pull off a table of contact details of Branch members; or the person using the database to compile and send out a list of labels for letters to be sent out”.

## **10. DETAILS OF TRANSFERS TO THIRD COUNTRIES**

(Not applicable)

## **11. RETENTION SCHEDULES**

These may vary in accordance with the need of “business and other obligations”. However, the basic principle of “no longer than is necessary” will apply. The RAF Association “Personal Data Privacy Standard Operating Procedure (PDP SOP003), Personal Data Retention and Demand” provides detailed guidance on this aspect.

## **12. DESCRIPTION OF TECHNICAL AND ORGANISATIONAL SECURITY MEASURES**

The measures taken by the branch to ensure personal data is kept secure include Password protected Personal Computers, limited use of BC email circulations, individual (Trustee) data protection also include password protected computer facilities and physical security for hard-copy data i.e. address books etc. which will be kept secure.

The branch will also comply with the “RAF Association Personal Privacy Policy” currently in force; and this Policy can be read in conjunction with the Association Information Environment Security Policy (ICT Security Policy 1.0), and the relevant Standard Operating Policies (SOP) – all available on Members Portal (RAFA Website).

NOTE:

Members, volunteers and others with whom Association data has been shared may be personally liable for any breach of the DPA.

### **13. RECORDS OF CONSENT;**

- Individuals can consent to processing; but
- Consent means offering individuals real choice and control
- Consent must be a positive opt-in
- Consent can be withdrawn at any time (by the individual)
- Verbal consent is acceptable; but must be recorded (this may be suitable for Visitor/Helper contacts)

See Lawful Basis for Processing above; and Privacy Notices at Annex A&B

### **14. CONTROLLER-PROCESSOR CONTRACTS;**

Whenever a controller uses a processor it needs to have a written contract in place.

The contract is important so that both parties understand their responsibilities and liabilities.

Processors must only act on the documented instructions of a controller. They will however have some direct responsibilities under the GDPR and may be subject to fines or other sanctions if they don't comply.

#### **ASSESSMENT**

Within Edinburgh, Lothians and Borders Branch; a contract exists between the RAFA S&NI Area Data Controller and the Branch Data

Processor who acts on behalf of the Branch Trustees. This contract is renewed annually.

The Branch Data Controller (who also acts as Data Processor and Extractor) will “de-facto” have a documented contract binding himself or another



authorised individual within the branch.

No other formal contracts are undertaken by the branch trustees.

**15. THE LOCATION OF PERSONAL DATA;**

(SEE PARAGRAPH 12.)

**16. RECORDS OF PERSONAL DATA BREACHES;**

(Currently none) – any breaches or suspected breaches will be notified to the Information Commissioner within 72 hours; and to Branch Trustees, Area Data Controller and RAF Association Data Protection Officer as soon as possible, the results recorded as part of this document.

NOTE:

“A Breach – is a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosures of, or access to, personal data”.

“A Serious Breach – results in significant adverse effects of individuals, which include emotional distress, and physical and material damage”.

ADVICE:

“Minimising the information held(e.g. Names and contact details only) restricts the potential damage caused”.

**17. INFORMATION REQUIRED FOR PROCESSING SPECIAL CATEGORY DATA OR CRIMINAL CONVICTION AND OFFENCE DATA UNDER THE DATA PROTECTION BILL:**

- a) Generally Not Applicable; however
- b) The Branch Honorary Welfare Officers and Assistant Welfare Officers (who may also act as Area Welfare Caseworkers) will record and process special category data for those of the RAF Family who are experiencing difficulty and requiring the assistance of the Association ; or other relevant charities/agencies. This data is strictly controlled under the Area and/or RAF HQ Data Controllers.

## 18. **BEFORE GDPR**

In January 2016 a “Data Pack” was issued to all RAFA Branches & Clubs in relation to the Data Protection Act 1998; and published on the RAFA Website Members Portal. This Policy and related guidelines were circulated to all Branch Committee/Trustees and active volunteers within the branch. In addition; our Branch Membership Secretary registered with the Scotland & NI Area Office as the “Branch Data Processor”. The issue was highlighted at the branch AGM on 24 March 2016 and subsequent branch meetings.

Although the branch were in support of a high level of data protection throughout the Association – there were some concerns that the Policy and Guidelines did not relate to “branch operations” and these concerns were relayed to the RAFA Interim Data Protection Officer accordingly.

## 19. **NOW GDPR 2018**

a) In January 2017, due to media exposure, the Branch Trustees became aware of the General Data Protection Regulation (GDPR) 2018; and as a result made enquiries of the Chief Information Officer at RAF Association Headquarters in Leicester, and also researched the Information Commissioner's website. Initially this was to clarify if charities would be subject to these regulations?

The response received from RAFA HQ was in the affirmative and the branch was advised that guidance would be issued to RAFA Branches in due course.

b) In March 2017 the Chairman of the RAFA Information Environment (IE) Committee issued draft Personal Data Protection Policy and a number of Standard Operating Procedures (SOP's); this for consultation. The IE Chairman stated “that Personal Data Protection would be strengthened by the implementation of GDPR 2018 and that the Policies and SOP's would be enhanced as they emerged.

c) On 8 March 2017, the RAFA IE Committee issued the updated versions (originals created December 2013) of the Association's Data Protection Policy.

d) At the end of March 2017, the Edinburgh, Lothians and Borders Branch submitted responses to the draft consultation documents. In early April 2017 the branch was advised that some of our suggestions had been incorporated into the new documentation, particularly as they affected RAFA Branches themselves.

e) In May 2017, branches were reminded (via Area Newsletters) i.e. “that The Association has a legal obligation to protect personal data in conformance with the Data Protection Act (DPA)1998”; and “that the Association's Data Privacy Policy, together with the associated Standard Operating Procedures, describe the measures necessary for the Association and its members to

comply with the DPA”.

In addition; “at branch level this means that any personal data held about branch members must only be used for legitimate Association purposes and that all personal data must be kept under strict control and not inadvertently shared or made available for unauthorised use”.

Branches were also reminded “that the Association is only able to share personal data with branch officials who have agreed to use such data in compliance with the Policy; and have signed the Annual Certificate of Compliance for the protection of personal data”.

f) It should be noted that the Edinburgh, Lothians and Borders Branch had had already complied prior to this reminder being issued from RAF HQ in Leicester – and continues to do so.

g) In February 2018, the Branch Trustees were becoming concerned that no further guidance was being received from RAF HQ. As a result the Branch Interim Chairman and Nominated Data Processor made enquiries of Scotland & NI Area Office and the Chief Information Officer for RAFA in Leicester. This enquiry resulted in advice that DPA/GDPR considerations were still at the Working Party stage; and links to various sources of information on GDPR were given.

viii) At this point, the Trustees agreed that the Branch required to assess the implications of GDPR for itself and under the guidance and efforts of the Branch Data Processor, commenced outlining what the branch required to do to comply with GDPR 2018.

h) On 8 February 2018 the Branch Interim Chairman issued update on our deliberations to Trustees and Members- these being published in a Branch Quarterly Newsletter and on Branch Facebook page (and thus the Branch Website). This further advised on the forthcoming implementation of GDPR on 25 May 2018; also listing the rights of individuals in relation to this legislation. The paper also advised “that, on the whole, the rights of individuals under GDPR are the same as those under the DPA 1998, but with some significant enhancements”.

In addition, on 25 February, attendees at the Branch Annual General Meeting were advised of GDPR implications and progress to date.

i) Post Branch AGM a small group of Trustees and interested individuals “brainstormed” where we were with GDPR and formulated a outline Action Plan to take us forward. This Action Plan focussed on AWARENESS, INFORMATION HELD, CONSENT, CONTINUED EFFORTS TO RECEIVE BRANCH SPECIFIC GUIDANCE FROM RAFA HQ, WHO WILL BE RESPONSIBLE?; and PRIVACY NOTICES Updates on GDPR have been provided at every Branch Monthly Meeting to date.

j) Various email communications between Trustees, Branch Chairman/Data Processor with RAFA HQ took place; although not ideal- did

enhance the branch's understanding of DPA and GDPR.

k) In March 2018 RAFA HQ in Leicester commenced publishing “Branch and Club Communications Papers (General Data Protection Regulation”. These papers coverering various aspects of the new regulations.

l) At S&NI Area Conference in Glasgow in April 2018, our HWO, Branch Secretary and Chairman were fortunate to have a conversation with the RAFA Director of Governance; this with a view to clarifying information she shared during her “Governance” presentation at Conference. She provided some interesting and useful clarifications on GDPR that have been incorporated into this document.

m) Due to the dearth of branch specific guidance emanating from RAFA HQ in Leicester; the Branch Trustees were in agreement that the Data Processor and Chairman should continue with our action plan; and ensure we are complying with the new GDPR, in particular with regard to informing Members and others who for whom we hold data.

n) On 14th May 2018 the Branch Data Processor circulated our agreed Privacy Notice for Members & Non-Members (including Branch Helper/Visitor contacts). See Annex. A & B to this document. At the same time these Privacy Notices were published on the Branch Facebook page and in a prominent position of the Branch Website.

## 20. **CONCLUSION**

It is expected that this document will act as a reference for Data Protection compliance in the future, will be kept updated; and will be the basis for future reviews.

## 21. RELEVANT DATA PROTECTION LINKS

Edinburgh, Lothians and Borders Branch RAFA, Website

<http://edinburghrafa.org.uk/>

Edinburgh, Lothians and Borders Branch RAFA, Facebook page

<https://www.facebook.com/RAF-Association-Edinburgh-Lothians-and-Borders-Branch-584393681650950/>

RAFA PERSONAL DATA PROTECTION POLICY (on Members Portal)

<https://www.rafa.org.uk/>

RAFA Privacy Policy

<https://www.rafa.org.uk/privacy/>

ICO Website

<https://ico.org.uk>

<https://ico.org.uk/global/contact-us/advice-service-for-small-organisations/>.

Office of the Scottish Charity Regulator (OSCR)

<https://www.oscr.org.uk/managing-a-charity/general-data-protection-regulation-gdpr>

<https://www.oscr.org.uk/news/are-you-ready-for-data-protection-reform> (12 Steps)

## 22. RECORD OF ONGOING REVUES

(recorded as Annex's to this document).

Brian Fox (Branch Membership Secretary)

Data Processor/Controller

Bob Bertram MBE

Branch Chairman/Trustee

25 May 2018

## ANNEX A

### **GENERAL DATA PROTECTION REGULATION (GDPR) 2018: PRIVACY NOTICE TO BRANCH MEMBERS**

Dear Member

There can't be many people now who are not aware that Data Protection Law and rules are being significantly updated on 25<sup>th</sup> May, 2018, and that means that we need to advise you of what personal information we hold about you and how we use it and protect it. As the Branch Membership Secretary and Data Protection Processor I maintain a Branch Membership List which is initially supplied by RAFA HQ in Leicester and then brought up-to-date monthly to take account of new members, leavers, changes of address etc.

***The record for for each member is made up of*** : Membership Number, Name, Address, Phone Number (where you have supplied it), Email Address (where you have supplied it), Original Start Date of Membership, Expiry Date of Current Subscription and Type of Membership (Full, Associate, Life, Serving, Honorary).

***What do we use this information for?*** : Names, addresses and telephone numbers are obviously required for keeping members up-to-date with Branch matters ie Newsletters and events (Branch Meetings, Social Events, the AGM). Where an email address is available then it also makes sense to save time and money by making full use of it. The Original Membership Starting Date is used to keep track of Long Membership Badge qualification and the Expiry Date of the Current Subscription to keep track of, and send reminders to, Lapsed Memberships.

A Monthly Report is submitted at the Branch Committee giving the losses/gains and ongoing total membership and the types of membership and a similar report is made to the membership at the Annual General Meeting. This report can also include a breakdown of member numbers by postcode which shows the membership spread over what is a very large Branch area. Personal contact details will not be shared within these reports. However, on occasion your details may be shared with relevant and authorised persons i.e. Branch Committee/Trustees; your details only being used for your benefit and kept secure in accordance with RAF Association protocols.

***Where do we keep this information and how secure is it?*** : All membership matters are held on my password protected personal computer (which never leaves home) with a back up to a commercial cloud storage facility. We do not pass email addresses to any other person or organisation (except as above) and you will be aware that emails you receive from us come as BCC so email addresses are not visible to other addressees. It should be noted that other relevant/authorised persons in the branch may also retain some personal contact information for members; and these will used and kept secure as above.

**Welfare Beneficiaries** : It should perhaps be pointed out that when members of the Branch Welfare Team have the first contact with a new 'beneficiary' they may check with the Membership Secretary if he or she is a member of the Association and Branch but after that initial contact all details of the client and the case are kept, securely, by the Welfare Team and Data Controlled by the Scotland & NI Area/RAFA HQ Leicester Data Processor/Controller. Should you for any reason need to call on their assistance at any stage in the future then that aspect will be fully explained to you at that time.

**NOTE:**

Contact with a new 'RAF Family Helper/Visitor (TLC - Tender Loving Care) contact' may also result in a check with the Membership Secretary if he or she is a member of the Association and Branch, after that initial contact all details of the client and the case are kept, securely, by the Welfare Team and under the Data Control of the branch.

In conclusion; and on behalf of the Edinburgh, Lothians and Borders Branch of the RAF Association Committee/Trustees and myself as nominated Data Processor – I take this opportunity to remind you of your rights under the General Data Protection Regulation 2018:

**Your' Individual Rights**

- **the right to be informed**
- **the right of access**
- **the right to rectification**
- **the right to erasure**
- **the right to restrict processing**
- **the right to data portability**
- **the right to object; and**
- **the right not to be subject to automated decision-making including profiling**

**NOTE;**

**On the whole, the rights of individuals will enjoy under GDPR are the same as those under the Data Protection Act , but with some significant enhancements.**

Thanks for reading, if you have any further questions please come back to me or see the link below:

<https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/>

Regards

Brian Fox

Branch Nominated Data Processor/Membership Secretary

## ANNEX B

### **GENERAL DATA PROTECTION REGULATION 2018: PRIVACY NOTICE (NON-MEMBERS)**

There can't be many people now who are not aware that Data Protection Law and rules are being significantly updated on 25<sup>th</sup> May, 2018, and that means that we need to advise you of what personal information we hold about you and how we use it; and protect it.

As far as we are aware, you are not a member of the RAF Association, but appear on one of our email lists as someone who has at some stage expressed an interest in our events and the work we do. In such a case the only information we hold is likely to be your email address, postal address and/or telephone numbers, all of which are held on my password protected personal computer which never leaves home. We do not pass contact details to any other person or organisation; except that on occasion your details may be shared with relevant and authorised persons i.e. Branch Committee/Trustees; your details only being used for your benefit and kept secure in accordance with RAF Association protocols. All the emails you have received from us in the past few years have shown the option (see below) to have your contact details removed from our mailing list if you no longer wished to hear from us and on those few occasions in the past when someone has requested it, these details have been swiftly removed. You will also be aware that all emails received from us come as BCC so no-one knows who else has received that email.

***Welfare Beneficiaries*** : It should perhaps be pointed out that when members of the Branch Welfare Team have the first contact with a new 'RAF Family Helper/Visitor (TLC - Tender Loving Care) contact' they may check with the Membership Secretary if he or she is a member of the Association and Branch, after that initial contact all details of the client and the case are kept, securely, by the Welfare Team and under the Data Control of the branch.

From 25<sup>th</sup> May, 2018, the above process will not be sufficient. You will need to tell us that you wish to continue receiving our emails or other communications; and we will require your consent to continue contacting you.

**So, if you do wish to continue hearing from us please reply to this Notice as soon as possible - if you don't wish to to continue then you need do nothing; your address will be removed from the listing on 25<sup>th</sup> May, 2018.**

In conclusion; and on behalf of the Edinburgh, Lothians and Borders Branch of the RAF Association Committee/Trustees and myself as nominated Data Processor – I take this opportunity to remind you of your rights under the General Data Protection Regulation 2018:

#### **Your' Individual Rights**



- **the right to be informed**
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**NOTE;**

**On the whole, the rights of individuals will enjoy under GDPR are the same as those under the Data Protection Act , but with some significant enhancements.**

Thanks for reading, if you have any further questions please come back to me or see the link below:

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Regards

Brian Fox

Branch Nominated Data Processor/Membership Secretary

## ANNEX C

<b>DATE</b>	<b>VERSION</b>	<b>AUTHOR</b>
01 March 18	DRAFT	Bob Bertram/Brian Fox
25 May 2018	1.0	David Prior
28 May 2018	1.1	David Prior