

DATA PROTECTION POLICY

1. GENERAL

- 1.1. Pinchbeck Photographic Group (PPG) is established with the objects set out in its Constitution and Rules (separate documents) and is a data controller within the UK.
- 1.2. PPG will rely on Article 6(1)f of the European Union General Data Protection Regulations which came into force on 25th May 2018. By virtue of its (this) PPG Data Protection Policy, PPG will rely on the principle of Legitimate Interest for the collection and retention of data and will therefore not seek explicit consent to hold personal data as detailed in this policy.
- 1.3. The personal information referred to in this Policy may include name, contact details, service records, records of entries to events, metadata contained within digital photographic image files (Images) and such other information as may be necessary for the effective management of the legitimate interests of PPG. Any person wishing to verify the information held by PPG may apply to the Secretary.
- 1.4. All PPG officials and members must ensure a proper understanding of this policy and their responsibility to act within its terms.

2. DATA COLLECTION

PPG collects and holds personal information about:

- 2.1 Its member, some of whom will form its Management Committee, others who assist that Management Committee, those offering their services to the PPG community e.g. as judges or speakers and non-members. This information is used to facilitate administration and services. Some of this information is compiled into a printed annual programme of events, circulated to the members of PPG and published on the PPG website. Such programme of events may also be published generally. The contact details of PPG officials allocated to provide particular services may be published generally.
- 2.2 Others necessary for the conduct of the business of PPG. This information is used to satisfy a requested service or a contractual requirement and may be retained to confirm the outcome.
- 2.3 Photographers as the creators of Images used in the activities of PPG. PPG may retain historical archives, for example (but not limited to) records of meetings, programmes, catalogues, awards, members' photographic images, competition results, members' contact details and other event results.

3. SOURCES AND PURPOSES OF COLLECTED AND RETAINED DATA

- 3.1 Membership Records - for each member, details may include:
 - 3.1.1 Names
 - 3.1.2 Address
 - 3.1.3 Telephone number(s)
 - 3.1.4 Email address
 - 3.1.5 Date of joining
 - 3.1.6 Date of leaving
 - 3.1.7 Photographic honours
 - 3.1.8 Attendance records
 - 3.1.9 Annual subscription payment records

This information either in whole or part is retained as either a paper record and/or a computer record held on a proprietary data base. The computer-based record may be held on the home computer of a member of PPG's Management Committee and/or on the computer owned by PPG. In all cases, computer-based records are password controlled. From time to time this data, either in whole or part may be shared with other members of the Management Committee.

- 3.2 Records for Internal Competitions and Exhibitions

For those members who enter such competitions the PPG Competition Rules make it clear the data required from members. It should be recognised that digital photographic image files are capable of carrying metadata. Such data may contain details of the camera on which the image was taken along with other camera related settings, geographic location of the image and other user supplied data added in post processing.

Members will provide images of their work in both print and digital formats. PPG will not retain physical prints on an archival basis, but may hold them on a temporary basis as follows:

- 3.2.1 Between the closing date for entries to a competition and the competition itself and following the competition if the member is not available to take back the prints immediately after the competition.
 - 3.2.2 Between the closing date for entries to an Exhibition and the Exhibition itself and following the Exhibition if the member is not available to take back the prints immediately after the Exhibition. Prints will be held on this temporary basis in the personal possession of a PPG member designated by the Management Committee.
- Prints may have appended to them the following information:

- 3.2.2.1 Name of the author of the image
- 3.2.2.2 Title of the image
- 3.2.2.3 Name and qualifications of the judge(s)
- 3.2.2.4 Details of other external competitions to which the image has either been submitted or displayed
- 3.3 Members' digital image files are retained on the Club computers for archival purposes principally to enable:
 - 3.3.1 Competition rule compliance
 - 3.3.2 Ease of publishing high scoring images to the PPG website
 - 3.3.3 Selection of images to be entered in external competitions
 - 3.3.4 Use as printed copy in advertising literature
- 3.4 Website and Handbook
 - Non-sensitive personal information may be published on the PPG website and/or Handbook and generally this will take the form of:
 - 3.4.1 Names of committee members
 - 3.4.2 Contact telephone number for a specific event
 - 3.4.3 Digital images named with the mark obtained in a competition, title of image and first name and surname of the author. Some published images may not contain all this information and might include images submitted for general interest.
 - 3.4.4 Competition score sheet with name and scores
 - 3.4.5 Award winning and commended images submitted for any Exhibition undertaken by PPG.

4. GENERAL PROTOCOLS

- 4.1 Email
 - PPG committee members use email extensively as a means of communication to PPG members. Unless there is a compelling reason to do otherwise, all circular type emails will be sent to members using the "Bcc" option so that the email address of each recipient is not revealed to the others. This is primarily to protect members generally, if one member should forward such an email outside the PPG community.
- 4.2 Right to be Forgotten
 - PPG will not automatically erase personal data of members who leave PPG
- 4.3 Data Separation
 - 4.3.1 It is recognised the PPG officials (or others) may also be officials or members of other separate organisations and may also hold personal data in those capacities. Such members may therefore be Data Controllers for more than one organisation.
 - 4.3.2 PPG expressly forbids any of its officials or members who hold personal data to share that data with another organisation and such members should also note that they are not permitted to share data the other way around.
- 4.4 Inter Club and similar Third Party Events
 - From time to time PPG participates in such events and this entails personal data (normally member name, image title and physical image (print and/or digital) being given to a third party over which PPG has no control over how data is held, retained or used. In such circumstances PPG will ensure that its selection process of images for such events includes the need for explicit consent to be obtained from the member(s) in question.
- 4.5 Data Retention
 - General PPG records (including membership and accounting records) will normally be held for a minimum of eight years, but PPG may retain historical archives indefinitely, for example (but not limited to) records of committee meetings, handbooks, catalogues, awards, competitions and other event results.