

The Hakluyt Society

Data Protection Policy and Procedures

(Approved by Council on 18 October 2017)

The primary purpose of this policy is to protect members and other persons against possible misuse of information held about them by the Society. It is written to comply with the Data Protection Act 1998 and the General Data Protection Regulation due to come into force in 2018. The policy seeks to apply guidance from the Information Commissioner's Office to the data processing activities of the Society.

The policy applies only to personal data relating to a living individual who can be identified from the data, either on its own or in combination with other information. The policy recognises that some data may be particularly sensitive due to its implications in a social context and therefore obtaining, recording or holding it requires extra care. If the Society takes possession of personal data, it becomes its controller and therefore legally responsible for it, even if it is processed on the Society's behalf by another organisation.

The Society is an educational charity engaged in publishing and distributing to its members edited historical texts of travel and exploration. It also engages in a small number of ancillary activities directly related to its charitable objectives, such as the promotion and sale of its volumes and the organisation of academic symposia related to its fields of research. It obtains, holds and deals with personal data solely for these purposes.

The Society's processing of personal data that comes under its control must respect the eight principles defined by the Regulatory framework. Accordingly:

1. First principle: personal data must be processed fairly and lawfully

1.1 Policies

The Society should tell people in advance what it intends to do with their data.

The Society must use the data in ways that people would reasonably expect.

1.2 Procedures

Application forms for membership should carry a notice explaining what the Society will do with members' data, and the notice should also appear on the members' section of the Society's website.

This explanation about the use of data should be summarised and repeated on other relevant documents, notably subscription renewal notices, to ensure that the way data is processed is regularly drawn to each member's attention.

The notice should include other important information about the Society's respect for any of the eight principles, of which the Society judges that its members should be aware.

The notice should make clear that submitting a membership application or paying a subscription will be deemed to constitute agreement to the uses thus defined.

Current versions of the notices are attached to this policy statement

2. Second principle: Personal data shall be obtained only for specific purposes and shall not be used for a purpose incompatible with the purposes for which it was collected.

2.1 Policies

Members' personal data shall be used solely for managing their membership status, subscription status, membership entitlements or, for example, invitations to events mounted or sponsored by the Society.

Personal data may be used for statistical or reporting purposes but, if so, must be summarised or rendered anonymous in such a manner that no individual can be personally identified.

Members' personal data may not be shared with any third party except when necessary in connection with membership matters such as, for example, processing banking Direct Debits or Gift Aid reporting.

If the Society wishes to use personal data in any other way, appropriate consent from members should normally be sought and obtained. If the proposed use involves disclosure to a third party, obtaining the member's consent is mandatory.

2.2 Procedures

Judgments about the uses of personal data for purposes that might be considered marginal to the policies should be recorded on behalf of the Officers.

Consent notices should be drafted so as to ensure clear communication and with a prominence appropriate to the matters on which consent is sought.

3. Third principle: Personal data obtained should be adequate, relevant and not excessive in relation to the purposes for which it is processed.

3.1 Policies

Personal data of members should normally be held solely to facilitate communication between the Society and its members.

Personal data about members should be limited to neutral, factual, non-judgmental information and held within a unique personal profile.

The Society should not obtain or hold any 'sensitive' personal data about members or other persons.

The Society should not retain members' financial details, except as necessary for such purposes as processing Direct Debits or Gift Aid.

All reasonable precautions should be taken to avoid including personal data in email or other correspondence. Where inclusion is required, for example email or postal addresses, its use should be anticipated in the Society's data processing notices

3.2 Procedures

The contents of a member's unique personal profile should normally be limited to the following information:

Membership number
Login name
Member's password
Full name and preferred salutation
Email address (and website address, if applicable)
Postal address
Telephone (and fax, if applicable)
Date of joining the Society
Subscription status for each year of membership
Direct Debit and Gift Aid status

The Society's administration maintains a note record for each member, if required, to record such matters as dates of distribution of volumes if outside the main distribution of a new volume. This note is solely for managing routine administration and should not include personal information.

Only the member or the Society's administration should be able to access the contents of that member's personal profile and such access should be controlled by passwords.

In the event that any other person wishes for access to any personal profile information, for example to contact a member, the member's permission should be sought and the member should be encouraged to follow up directly rather than through the Society.

4. **Fourth principle: Personal data should be accurate and kept up-to-date.**

4.1 Policies

Members should be encouraged to keep the Society up-to-date with changes or corrections known to them, particularly in respect of their personal profiles.

Changes and corrections should be implemented promptly, whether these are notified by members or identified by the Society.

Due care to respect the Society's policies and ensure accuracy should be applied to entering new data or updating existing records and in creating new files or templates.

4.2 Procedures

Encouragement to members to review their personal profiles should be compatible with procedures such as those set out in paragraph 2.1. above.

The administration should employ means for checking, ideally automatically, that notified changes are captured and processed promptly.

The checking should include flagging inappropriate changes, for example in the quality of data to be added, to allow exercise of appropriate policy judgments.

5. **Fifth principle: Personal data should not be held for longer than required for the purposes for which it is obtained**

5.1 Policies

The retention of a member's personal information should be limited to the period of membership and a reasonable time thereafter, as needed to maintain or renew contact at a later date.

Financial information should not be retained beyond the time needed to process the transaction for which it is provided, in particular, the Society should neither collect nor retain credit card data.

Other personal information obtained by the Society, for example in files related to recruitment, should not be held for more than six months.

5.2 Procedures

The preferred retention period for individual membership records is currently

Fully and partly paid up members: retained while active. Lapsed or resigned: archived for five years against possible renewal, then deleted. Died: removed when notified.

If reasons of Regulation, business purposes or historic interest arise for longer retention, an opinion from Officers should be sought.

Members' names and dates of membership may be archived to facilitate renewals of contact, should they occur.

6. **Sixth principle: Personal data should be processed in accordance with individual rights under the Regulations**

6.1 Policies

Members are entitled to access all personal data held about them, which will normally be the information in their personal profiles, as identified under the third principle.

Personal data should not be held outside members' personal profiles, particularly in emails, unless it is contained in correspondence with the member to which the member has received the whole string of messages.

Members should be encouraged to access their personal profiles, particularly to verify that it is complete, accurate and up-to-date to their satisfaction and as a means for the administration to be confident that this is so.

The Society does not use members' personal information for the purposes of direct marketing. Should this policy change in the future, prior consent should be obtained from each member targeted.

6.2 Procedures

Each member is provided with a unique membership number, login name and password, which are known only to the member and the administration. Members can access their profiles at any time from the 'members login' section of the Society's website by using their login names and passwords.

7. **Seventh principle: Appropriate technical and organisational procedures should be taken to prevent unauthorised processing and against accidental loss, damage or destruction.**

7.1 Policies

The Society's data security should provide protection against deliberate, accidental and careless processing, in particular of any personal data that might be used to facilitate identity theft or other misuse.

The Society should restrict personal data held by it to avoid retaining data that might cause harm to the people affected if there were to be a security breach.

Personal members' data should be contained in and processed only through the Society's membership database and, in particular, in the member's personal profile. Access to the database is limited to the administration and the Society's database processor and, in respect of each member's personal profile, by that member.

Personal data arising outside the database should be limited to that necessary for communication with or on behalf of the member, and this will be protected by the Society's general data security environment.

7.2 Procedures

The Society seeks to mitigate the risks to individuals of harmful breaches of data security through its data collection policies described under the previous principle. In particular, the Society seeks to minimise any holding of personal financial information or non-public identifiers and to avoid holding any 'sensitive' data that might cause harm if revealed by a data breach.

Access to the Society's computer and the online servers that its applications use is restricted to authorised users and is protected by means of multiple passwords set in accordance with the recommendations of the application providers, including but not limited to Microsoft, Google, Eudora, Adobe, Dropbox, Eventbrite and the membership database processor *ammonet*. The Society installs on a timely basis the routine security updates issued by these providers.

The Society's procedures require regular backups of data held separately from the Society's computer.

The Society does not store personal data on memory sticks. If it were to encounter a need to do so, the data would be encrypted.

8. Eighth principle: Personal data should not be transferred outside the European Economic Area unless the recipient country provides an adequate level of protection for personal data.

8.1 Policy

The Society should not transfer personal data outside the EEA, except as this may occur in their independent processing by way of its major service providers such as its bankers Barclays, HMRC and others who have their own responsibilities as data controllers.

The Society's independent service provider in respect of the Society's member database, *ammonet*, is a Swiss company using international 'cloud' servers. The Society should maintain an agreement that *ammonet* should act solely as processor and maintainer of the database in accordance with the Society's directions as controller.

8.2 Procedures

The Society's contractual arrangements with *ammonet* acknowledge that *ammonet* acts solely as processor in accordance with instructions from the Society.

Changes in members' personal data in the membership database should be initiated by the Society's administration or directly to their personal profiles by members, and not by *ammonet*.

The prime copy of the membership database is held by *ammonet* for practicability of maintenance, which also ensures its appropriate backup.

Where necessary for administrative purposes membership information may be shared with the Society's International Representatives, particularly in the United States and Australia, and this Policy should be applied to all data shared.

Notice to appear in members' section of the Hakluyt Society website and on application forms to join the Society

Data Protection

By applying to become a member of the Hakluyt Society, you consent to us using the information we may hold about you for the purposes of administration and to correspond with you on membership matters, particularly regarding your membership status and benefits of membership to which you may be entitled. It will not be used for any other purpose nor communicated to any third party without your consent. The information will be recorded in your membership profile, to which you have access at any time via the members' section of the Society's website or by contacting the Administrator. You are invited to use this access to satisfy yourself that it is accurate and up-to-date.

The Society's Data Protection Policy is published on its website, www.hakluyt.com.

Notice to appear on annual notices to members to renew their membership

Data Protection

By paying your subscription for the following year, you consent to us using the information we may hold about you for administration and not for any other purpose without your consent. You may access and verify the information at any time via the Society's website or by contacting the Administrator.

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Other notices should be compatible with those above