

DATA PROTECTION AND INFORMATION SECURITY POLICY

1 PURPOSE AND SCOPE

- 1.1 The Camping and Caravanning Club (The Club) is committed to being transparent about how it collects and uses personal data of members, non-members, employees, suppliers and other individuals, and to meeting its data protection obligations.
- 1.2 The Club trades under a number of brands:
- a) UK Clubsites;
 - b) Readycamp;
 - c) Club Holiday Homes.
- 1.3 This policy sets out The Club's commitment to data protection, and individual rights and obligations in relation to personal data, including its responsibilities relating to data handling and processing.
- 1.4 The Data Protection Office will hold responsibility for data protection compliance within The Club. Further information regarding this policy should be directed to the Data Protection Office.
- 1.5 Every individual employee, volunteer, member or contractor handling data collected or administered by The Club must take responsibility and due consideration for its appropriate use in line with this policy and the declared processing activities. The specific arrangements for handling, processing and administering data can be found on The Club's website at www.campingandcaravanningclub.co.uk
- 1.6 Any deliberate breach of the data protection policy may lead to disciplinary action being taken, or access to The Club's facilities being withdrawn, or the possibility of criminal prosecution. It may also result in personal liability for the individual.

2. DEFINITIONS

- 2.1 The definitions of personal data and special categories of personal data:
- a) 'Personal data' is any information that relates to an individual who can be identified from that information. Processing is any use that is made of data, including collecting, storing, amending, disclosing or destroying it.
 - b) 'Special categories of personal data' means information about an individual's racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, health, sex life or sexual orientation and biometric data.
 - c) 'Criminal records data' means information about an individual's criminal convictions and offences, and information relating to criminal allegations and proceedings.

3. DATA PROTECTION PRINCIPLES

- 3.1 Under the UK General Data Protection Regulation UK (UK GDPR), the data protection principles set out the main responsibilities for organisations. The Club processes personal data in accordance with the following data protection principles:
- a) The Club processes personal data lawfully, fairly and in a transparent manner;
 - b) The Club collects personal data only for specified, explicit and legitimate purposes;
 - c) The Club processes personal data only where it is adequate, relevant and limited to what is necessary for the purposes of processing;
 - d) The Club keeps accurate personal data and takes all reasonable steps to ensure that inaccurate personal data is rectified or deleted without delay;
 - e) The Club keeps personal data only for the period necessary for processing;
 - f) The Club adopts appropriate measures to make sure that personal data is secure, and protected against unauthorised or unlawful processing, and accidental loss, destruction or damage.
- 3.2 The Club informs individuals the reasons for processing their personal data, how it uses such data and the legal basis for processing in its privacy notices. It will not process personal data of individuals for other reasons.

4. RESPONSIBILITIES

4.1 **Members, suppliers and contractors**

Members, suppliers and contractors must ensure all personal data provided to The Club is accurate and up to date, and that they have read and understood the relevant terms of conditions of engagement with The Club. They should ensure that changes of address etc. are updated on the appropriate systems as detailed in the privacy notices on The Club's website at www.campingandcaravanningclub.co.uk

4.2 **Volunteers**

Committee volunteers, representatives and other volunteers may handle personal data to administer their activities and services. Volunteers handling such data are required to have completed the data protection and information security training course prior to receiving permission to handle any personal data related to The Club's activities and services.

4.3 **Employees**

The Club holds various items of personal data about its employees which are detailed in the relevant privacy notice on The Club's website, HR system and intranet system. Employees must ensure all personal data provided to The Club in the process of employment is accurate and up to date. They must ensure any changes are updated on the appropriate systems or contact the HR Department. All employees are required to have completed the data protection and information security training course and to observe this policy.

4.4 **Managers**

Managers must ensure that staff or volunteers handling personal data in the duration of their roles have conducted the appropriate training, are processing data within agreed frameworks and abiding to this policy. Managers are also required to conduct annual audits of their relevant spaces and IT to identify possible weaknesses information security.

4.5 **Director General**

The Director General is responsible for the general development, promotion and adherence to this policy, and ultimately responsible for compliance by staff and volunteers. The operational aspects of data protection management may be delegated to other levels of management. The Director General must gain assurance that these responsibilities are being fulfilled and to ensure resources are available to fulfil the requirements of this policy and associated procedures.

5. **COMPLIANCE**

5.1 The UK GDPR sets out a series of rights for individuals. Employees and volunteers planning data processing activities must record how these rights are addressed.

5.2 **Subject access requests**

Individuals have the right to make a subject access request. If an individual makes a subject access request, The Club will tell them:

- a) whether or not their data is processed and if so why, the categories of personal data concerned and the source of the data if it is not collected from the individual;
- b) to whom their data is or may be disclosed, including to recipients located outside the European Economic Area (EEA) and the safeguards that apply to such transfers;
- c) for how long their personal data is stored (or how that period is decided);
- d) their rights to rectification or erasure of data, or to restrict or object to processing;
- e) their right to complain to the Information Commissioner if they think The Club has failed to comply with their data protection rights;
- f) whether or not The Club carries out automated decision-making and the logic involved in any such decision-making.

5.3 The Club will also provide the individual with a copy of the personal data undergoing processing. This will normally be in electronic form if the individual has made a request electronically, unless they agree otherwise.

5.4 To make a subject access request, the individual should send their request using The Club's Subject Request Form to the Data Protection Office at data.protection@campingandcaravanningclub.co.uk

The Data Protection Office
The Camping and Caravanning Club
Greenfields House
Westwood Way
Coventry
CV4 8JH

(refer to Appendix 1). The Club will ask for proof of identification to verify the individual's identity before the request can be processed.

5.5 The Club will normally respond to a request within one month from the date it is received. In some cases, such as where The Club processes large amounts of the individual's data, it may respond within two months of the date the request is received. The Club will write to the individual within one month of receiving the original request to tell them if this is the case.

5.6 If a subject access request is manifestly unfounded or excessive, The Club is not obliged to comply with it. If an individual submits a request that is unfounded or excessive, The Club will notify them that this is the case and whether or not it will respond to it.

5.7 **Other rights**

Individuals have a number of other rights in relation to their personal data. They can require The Club to:

- a) rectify inaccurate data;
- b) stop processing or erase data that is no longer necessary for the purposes of processing;
- c) stop processing or erase data if the individual's interests override The Club's legitimate grounds for processing data (where The Club relies on its legitimate interests as a reason for processing data);
- d) stop processing or erase data if processing is unlawful;
- e) stop processing data for a period if data is inaccurate or if there is a dispute about whether or not the individual's interests override The Club's legitimate grounds for processing data.

5.8 To ask The Club to take any of these steps, the individual should send the request to the Data Protection Office.

5.9 **Data processing**

The Club shall only process data within the law. Employees and volunteers who have access to personal data are required:

- a) to access only data that they have authority to access and only for authorised purposes;
- b) not to disclose data except to individuals (whether inside or outside of The Club) who have appropriate authorisation;
- c) to keep data secure (including complying with procedures on access to premises, computer access, including password protection, and secure file storage and destruction);
- d) not to remove personal data, or devices containing or that can be used to access personal data, from The Club's premises without adopting appropriate security measures (such as encryption or password protection) to secure the data and the device;
- e) not to store personal data on local drives or USB flash drives.

5.10 Failing to observe these requirements may amount to a disciplinary offence, which will be dealt with under The Club's disciplinary procedure. Significant or deliberate breaches of this policy, such as accessing employee or student data without authorisation or a legitimate reason to do so, may constitute gross misconduct and could lead to dismissal without notice.

6. DATA AND INFORMATION SECURITY

6.1 The Club takes the security of personal data seriously. The Club has controls in place to protect personal data against loss, accidental destruction, misuse or disclosure, and to ensure that data is not accessed, except by employees or volunteers in the proper performance of their duties.

- 6.2 Electronically stored personal data must be stored in an encrypted or password protected form to protect against unauthorised access or processing. Physical representation of data, such as paper forms, must be stored within a locked storage unit. When no longer needed, the e-copies should be deleted and any paper copies securely destroyed.
- 6.3 The Club has a number of platforms for securely storing data, including: Office 365; ITrent; Absorb; Travellers Booking System, SalesForce (Memberships) and Great Plains (Finance system). Employees and volunteers are required to store data they handle on one of these platforms.
- 6.4 Explicit permission from line management must be obtained before removing restricted information, including personal data and confidential information from The Club's premises. Restricted information processed on portable devices and media must be encrypted. The password to an encrypted device must not be stored with the device.
- 6.5 Occasionally, The Club may transfer and share data to third parties to process personal data, such as Royal London and People's Pension (our pension providers), The Club holds specific data sharing agreements to ensure the security of data.
- 6.6 The Club holds a register of personal data outlining the categories of personal data, purpose for processing, legal basis for processing, additional safeguards, categories of data subjects, recipients to whom disclosed, transferred outside EEA, security measures and the period for which data is retained.
- 6.7 Some of the processing that The Club carries out may result in risks to privacy. Where processing would result in a high risk to individual's rights and freedoms, The Club will carry out a data protection impact assessment to determine the necessity and proportionality of processing. This will include considering the purposes for which the activity is carried out, the risks for individuals and the measures that can be put into place to mitigate those risks.
- 6.8 All employees and volunteers must undertake data protection and information security training to ensure sufficient security awareness. Employees and volunteers must make best attempts to protect their identity using a strong password. Account passwords and usernames should not be shared.
- 6.9 All digital equipment and media must be disposed of securely and safely when no longer required. Storage devices should always be wiped before the equipment leaves The Club; just hitting the delete key is not enough to wipe data from equipment. The Club has an arrangement to wipe data using specialist software. Employees must inform their line manager if they need to dispose digital equipment and media.
- 6.10 The Club shall protect payment cardholders from the risk of data loss by maintaining compliance with the Payment Card Industry Data Security Standard (PCI DSS). Additional technical and organisational controls will be implemented by The Club to protect the security of payment cardholder data. In accordance with the obligations of PCI DSS, The Club shall establish, implement and maintain appropriate information security policies and procedures, including security awareness training, risk assessments and incident response plans.

The Club shall ensure that appropriate policies, procedures and agreements are in place with service providers with whom cardholder data is shared, including:

- a) Due diligence of prospective service providers prior to engagement.
- b) Regularly monitoring the PCI DSS compliance status of service providers.

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7. DATA BREACHES

- 7.1 Where an employee, volunteer, supplier or contractor discovers a data breach they must report this within 24 hours to The Data Protection Office telephone on +44 (0)24 7647 5448 or email at data.protection@campingandcaravanningclub.co.uk

The Data Protection Office
The Camping and Caravanning Club
Greenfields House
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Coventry
CV4 8JH

- 7.2 If The Club discovers that there has been a breach of personal data that poses a risk to the rights and freedoms of individuals, it will report it to the Information Commissioner's Office (ICO) within 72 hours of discovery. The Club will record all data breaches regardless of their effect. The ICO is the independent supervisory authority set up to promote and oversee compliance with data protection legislation in the UK. Their address is Information Commissioner's Office, Wycliffe House, Water Lane, Cheshire, SK9 5AF. Telephone on 01625 545 745 or via their website at www.ico.org.uk
- 7.3 If the breach is likely to result in a high risk to the rights and freedoms of individuals, it will tell affected individuals that there has been a breach and provide them with information.

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CAMPING AND CARAVANNING CLUB

SUBJECT ACCESS REQUEST FORM

The UK General Data Protection Regulations (UK GDPR) provides you, the data subject, with a right to receive a copy of the data/information we hold about you or to authorise someone to act on your behalf. Please complete this form if you wish to see your data. You will also need to provide proof of your identity. Your request will be processed within 30 calendar days upon receipt of a fully completed form and proof of identity.

Proof of identity:

We require proof of your identity before we can disclose personal data. Proof of your identity should include a copy of two documents such as your birth certificate, passport, driving licence, official letter addressed to you at your address e.g., bank statement, recent utilities bill or council tax bill. The documents should include your name, date of birth and current address. If you have changed your name, please supply relevant documents evidencing the change.

Administration fee:

The Camping and Caravanning Club is not to charge for Subject Access Requests.

Section 1: Data Subject

Please fill in your details (the data subject). If you are not the data subject and you are applying on behalf of someone else, please fill in the details of the data subject below and not your own.

Title:	
Surname/ Last Name:	
First Name(s):	
Date of Birth:	
Address:	
Post Code:	
Day Time Telephone Number	

Identification:

I am enclosing the following copies as proof of identity:

Birth Certificate [] Driving Licence [] Passport [] Official letter to my address []

Personal Information

If you only want to know what information is held in specific records, please indicate in the box below. Please tell us if you know in which capacity the information is being held, together with any names or dates you may have. If you do not know the current name of the department just tell us what you do know. If you do not know exact dates, please give the year(s) that you think may be relevant.

Details:

Employment Records

If you are now or have been employed by the Camping and Caravanning Club and are seeking personal information in relation to your employment, please provide details of your role, department and dates of employment.

Details:

Section 2: Representation

Please complete this section of the form with your details if you are acting on behalf of someone else (i.e., the data subject).

If you are **NOT** the data subject, but an agent appointed on their behalf, you will need to provide evidence of your identity as well as that of the data subject and proof of your right to act on their behalf.

Title:	
Surname/ Last Name:	
First Name(s):	
Date of Birth:	
Address:	
Post Code:	
Day Time Telephone Number (s)	

Identification:

I am enclosing the following copies as proof of identity:

Birth Certificate [] Driving Licence [] Passport [] Official letter to my address []

Relationship to the data subject

Please describe below your relationship to the data subject (e.g., parent, carer, legal representative):

Authorisation

I am enclosing the following copy as proof of legal authorisation to act on behalf of the data subject:

- Letter of authority
- Lasting or enduring power of attorney
- Evidence of parental responsibility
- Other: _____

Section 3: Declarations**Data Subject Declaration:**

I certify that the information provided on this form is correct to the best of my knowledge and that I am the person to whom it relates. I understand that the Camping and Caravanning Club is obliged to confirm proof of identity/authority and it may be necessary to obtain further information in order to comply with this subject access request.

Name:	
Signature:	
Date:	

OR (if applicable)

Authorised Declaration:

I confirm that I am legally authorised to act on behalf of the data subject. I understand what is required to confirm proof of identity/authority and it may be necessary to obtain further information in order to comply with this subject access request.

Name:	
Signature:	
Date:	

Warning: a person who unlawfully obtains or attempts to obtain data is guilty of a criminal offence and is liable to prosecution.

Section 4: Actions

I wish to:

- Receive the information in electronic format
- Receive the information by post*
- Collect the information in person

**Please be aware that if you wish us to post the information to you, we will take every care to ensure that it is addressed correctly. However, we cannot be held liable if the information is lost in the post or incorrectly delivered or opened by someone else in your household.*

Please send your completed form and proof of identity to:

The Data Protection Office
The Camping and Caravanning Club
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CV4 8JH

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