



PERSONAL DATA AND INFORMATION PRIVACY POLICY

Issue: 1
Date: 16th October 2018

1. Introduction

SENUG – The South East Northumberland Rail User Group – is a voluntary non- legally constituted organisation that promotes rail travel and campaigns for better rail services in, within, to, from and through South East Northumberland, representing the interests of both existing and potential rail travellers.

SENUG takes its responsibility for and the security of the personal data it holds very seriously. This policy has been reviewed and agreed by the SENUG Committee, who are responsible for ensuring SENUG complies with the law.

2. What Data is Held by SENUG and what Data is Held Personally by SENUG Members?

SENUG deems that data that is held by its Membership Secretary, Chair and Treasurer, which the office-holder would pass on to anyone else who takes over the role, is data that is held by SENUG and is thus covered by this policy. As SENUG is an unconstituted organisation, Committee Members holding data on behalf of SENUG are personally responsible for compliance with this policy.

Other data that is held by committee members or other SENUG members which is not essential to the ongoing operation of SENUG and would not be passed over to anyone else taking over the role the data holder has, is deemed to be data that is held personally by that person, rather than being held by SENUG, and is outside the scope of this policy.

3. Why Is Personal Data Kept?

SENUG keeps personal data solely for purposes of managing its membership list and subscriptions, managing its finances, operation of its committee, being accountable to and communicating with members and communicating with a wider range of rail industry managers, stakeholders and journalists.

The personal data SENRUG keeps is for its own use and reference only and is not manipulated in any way, other than, in certain cases, for the compilation of statistics. SENRUG does not engage in data profiling or any similar activity, or run marketing campaigns which involve personal data.

SENRUG warrants it will never sell personal data for commercial gain or pass personal data to any other organisation without the individual’s consent, except that it may subject to a reasonable request being received, pass personal data to the police or a statutory crime prevention agency to assist with the investigation or avoidance of a serious crime.

4. What Personal Data Does SENRUG Keep?

SENRUG has identified it keeps 6 different sets of personal data, which are listed below. For each set of personal data, the reason it keeps the data, the legal basis on which it is kept, the SENRUG committee member(s) who holds it, how the data is held (see Section 5) and the retention policy for the data is stated.

Where the legal basis for holding personal data is stated as “Legitimate Interest”, SENRUG has undertaken and documented a Legitimate Interest Assessment (LIA) to confirm this is a valid basis for holding the data in question. These LIAs are Annexes to this policy.

SENRUG has identified some of the data sets it holds as including “Special Category” data. This is because an individual’s political beliefs could be inferred from the data it holds. This only applies to a) elected representatives and those seeking election, where the political party the data subject has declared they represent is recorded, and b) office holders for Trade Unions, since political beliefs might be inferred from trade union activism.

4.1 Membership List

Data Set Title	Membership List
What Personal Data Is Held?	Names, contact details, class of membership and subscription records of members (including nominated representative for a corporate member)
Why Is It Held?	To allow SENRUG to manage membership subscriptions and to communicate with members
Legal Basis on Which It Is Held	Legitimate Interest
Legitimate Interest Assessment Completed?	Yes - See Annex 1
Is it Special Category Data?	Yes (see note below)
Who Holds It?	Membership Secretary
How Is It Held?	Desktop PC
Who Else Is It Shared With?	Chair
Retention Policy	Members details are deleted from current Membership List on request from data subject, or within 1 year of membership lapsing. Historic Membership Lists are deleted after 7 years.

Membership List - Special Category Data: Where a Trade Union or branch of a Trade Union joins SENRUG, SENRUG will keep details of the nominated contact person, normally an office holder within the Trade Union. Political beliefs might be

inferred from the fact the data subject holds office within a Trade Union. Political beliefs or any other form of Special Category data is not held for any other data subjects in this list.

4.2 Bank Statements

Data Set Title	Bank Statements
What Personal Data Is Held?	Names, post codes and amounts paid for members who have paid subscriptions, or other donors who have given to SENRUG via bank transfer.
Why Is It Held?	Bank statements are held for to enable SENRUG to manage its finances, to produce year-end accounts and to identify the originator of incoming payments.
Legal Basis on Which It Is Held	Legitimate Interest
Legitimate Interest Assessment Completed?	Yes - See Annex 2
Is it Special Category Data?	No
Who Holds It?	Treasurer
How Is It Held?	Paper (see note below)
Who Else Is It Shared With?	Membership Secretary, Chair
Retention Policy	For 7 years after the end of the current financial year

Bank Statements - How is Data Held: An image copy of bank statements is also emailed to the Membership Secretary and Chair to enable reconciliation with Membership Records, then deleted within a month of receipt.

4.3 Committee Members List

Data Set Title	Committee Members List
What Personal Data Is Held?	Names of committee members, declared affiliations and contact details for certain key committee positions (Chair, Deputy Chair, Newsletter Editor).
Why Is It Held?	To allow this data to be made available to SENRUG members, in the interests of transparency and governance.
Legal Basis on Which It Is Held	Consent
Legitimate Interest Assessment Completed?	No
Is it Special Category Data?	Yes (see note below)
Who Holds It?	Chair
How Is It Held?	Desktop Computer
Who Else Is It Shared With?	The general public (published on SENRUG website)
Retention Policy	Deleted within 3 months of the AGM at the end of the year for which the data subject serves on the committee. Historic Committee Member Lists are not retained.

Committee Members List - Special Category Data: Where a Committee Member declares he or she is or is seeking to become an elected representative, SENRUG records the political party the data subject represents. If a Committee Member declares he or she is an office holder for a Trade Union, political beliefs may be inferred from trade union activism. Political beliefs or any other form of Special Category data is not held for any other data subjects in this list.

4.4 Committee Meeting Minutes and Other Committee Correspondence

Data Set Title	Committee Meeting Minutes and Committee Correspondence
What Personal Data Is Held?	Names of committee members attending or not attending committee meetings, actions they agree to undertake, progress they report and opinions they express. This information may be within formal meeting minutes, or emails and Word documents issued by the Chair.
Why Is It Held?	To allow the SENRUG committee to function professionally.
Legal Basis on Which It Is Held	Legitimate Interest
Legitimate Interest Assessment Completed?	Yes - See Annex 3
Is it Special Category Data?	No
Who Holds It?	Chair (see note below)
How Is It Held?	Desktop Computer
Who Else Is It Shared With?	Chair and Other Committee Members
Retention Policy	Deleted after 10 years

Committee Meeting Minutes and Correspondence - Who Is Data Shared With: The master copy of Committee Meeting Minutes held by the Chair is deemed to be SENRUG data. When minutes are issued, they are then held by recipients on a personal basis and these copies are not considered to be SENRUG data. Committee Meeting Minutes may also be drafted by a Meeting Secretary or Minute-taker, but the draft copy is deleted once the final copy is approved and issued by the Chair.

4.5 Stakeholder List

Data Set Title	Stakeholder List
What Personal Data Is Held?	Names, contact details and job titles of people SENRUG believes might be interested in its work. This includes managers in rail industry companies, statutory authorities, regeneration agencies, charities or other groups with similar objectives to SENRUG, and elected representatives.
Why Is It Held?	To allow SENRUG to communicate with such people when required and to send them updates regarding its work.
Legal Basis on Which It Is Held	Legitimate Interest
Legitimate Interest Assessment Completed?	Yes - See Annex 4
Is it Special Category Data?	Yes (see note below)
Who Holds It?	Chair
How Is It Held?	Desktop Computer
Who Else Is It Shared With?	No-one
Retention Policy	On request from the data subject, or when SENRUG has reason to believe the person no longer has the same job or role or is not, or is no longer, interested in SENRUG's work

Stakeholder List - Special Category Data: In the case of a data subject who is or is seeking to become an elected representative, SENRUG records the political party the data subject represents. In the case of office holders for a Trade Union, political beliefs may be inferred from trade union activism. Political beliefs or any other form of Special Category data is not held for any other data subjects in this list.

4.6 Press Contacts

Data Set Title	Press Contacts
What Personal Data Is Held?	Names, contact details, job titles and the publication or media channel represented of media professionals who SENRUG believes might be interested in its work.
Why Is It Held?	To allow SENRUG to communicate with the media and keep the media updated on its work and views.
Legal Basis on Which It Is Held	Legitimate Interest
Legitimate Interest Assessment Completed?	Yes - See Annex 5
Is it Special Category Data?	No
Who Holds It?	Chair
How Is It Held?	Desktop Computer
Who Else Is It Shared With?	No-one
Retention Policy	On request from the data subject, or when SENRUG has reason to believe the person no longer has the same job or role or is not, or is no longer, interested in SENRUG's work.

4.7 Members Who Have Joined or Renewed via Paypal

Data Set Title	Members Who Have Joined or Renewed via Paypal
What Personal Data Is Held?	Names, contact details, and subscription amounts of members who have joined or renewed their membership with SENRUG by Paypal.
Why Is It Held?	The committee member who downloads this information from Paypal must communicate it to the Membership Secretary and Treasurer, to allow the membership database to be updated, and for reconciliation with financial records
Legal Basis on Which It Is Held	Legitimate Interest
Legitimate Interest Assessment Completed?	Yes - See Annex 6
Is it Special Category Data?	Yes
Who Holds It?	Chair
How Is It Held?	Desktop Computer
Who Else Is It Shared With?	Membership Secretary and Treasurer
Retention Policy	On request from the data subject, or within 3 months, as the data will by then have been transferred to the Membership List (see 4.1).

Members Who Have Joined or Renewed via Paypal - Special Category Data: Where a Trade Union or branch of a Trade Union joins SENRUG, SENRUG will keep details of the nominated contact person, normally an office holder within the Trade

Union. Political beliefs might be inferred from the fact the data subject holds office within a Trade Union. Political beliefs or any other form of Special Category data is not held for any other data subjects in this list.

5. How Does SENRUG Keep Personal Data Secure?

SENRUG Committee Members have agreed to adhere to the following minimum security standards for the personal data they hold on SENRUG's behalf:

How / Where The Data Is Held?	Minimum Security Standard
Held on paper	When not in use, data must be kept in a locked filing cabinet and only the SENRUG committee member authorised to access the data should have access to the key.
Held on a personal desktop PC	The data must be kept within a password protected user account and the password for that account must only be known by the SENRUG committee member authorised to access the data.
Held on a personal laptop or tablet	<p>The data must be kept within a password protected user account and the password for that account must only be known by the SENRUG committee member authorised to access the data.</p> <p>Additionally, the files containing SENRUG personal data must be encrypted. This is more than the password protection offered within Microsoft Word or Excel (but it is not necessary for the entire laptop hard drive to be encrypted.)</p>
Held on a shared drive	Access to the file should only be available to the SENRUG committee member(s) authorised to access the data, and files should be further password protected and the password only given to SENRUG committee members authorised to access the data.
Held on a removable storage device (memory pen, CD, back-up disk drive)	When not in use, the removable storage device must be kept in a locked filing cabinet and only SENRUG committee member authorised to access the data should have access to the key.

6. What Rights Does An Individual Have?

Individuals have the right to ask SENRUG for a copy of any personal data that is being kept about them, and to request it be corrected (if it's inaccurate) or deleted. However if a SENRUG Member asks for the personal data held about them to be deleted, they will not be able to remain a member of SENRUG, and any membership fee paid will not be refunded (apart from cases of committee discretion).

7. Who Is SENRUG's Data Controller?

The Data Controller is the person holding the position of Chair at the time.

8. Contact Details

Should an individual wish to make a formal request to SENRUG to see the personal data held about them, or to ask for it to be corrected or deleted, please email chair@senrug.co.uk or contact the current Chair via the phone number posted on <http://www.senrug.co.uk/Contact.php>. For the July 2018 to June 2019 year, the Chair is Dennis Fancett and phone number is 01670 825500 (please respect that this is a home number)

9. Requirements For SENRUG Committee Members Holding Personal Data

This only applies to the SENRUG Chair, Membership Secretaries and Treasurer. No other SENRUG Committee Member should be holding personal data on behalf of SENRUG. These committee members have a responsibility within SENRUG that involves holding personal data must ensure:

- They are not holding any personal data other than that stated in in Section 4.
- The tables in Section 4 correctly records how they are holding the personal data (ie PC, Laptop, Shared Drive or on Paper)
- They are complying with the security requirements for that personal data set out in section 5
- They are complying and will comply with the data retention policy for the personal data they are holding, as set out in Section 4.
- If they receive a request to provide a copy of, amend or delete personal data, they will immediately notify the SENRUG Data Controller as stated in Section 8.
- They will immediately notify the SENRUG Data Controller as stated in Section 8 if they become aware of any breach of personal data they are holding on behalf of SENRUG (eg unauthorised access to data, or physical loss of a laptop, removable storage device or paper records)
- Prior to the final disposal of any PC, laptop or removable storage device that holds or has previously held SENRUG personal data, the disk will be erased (this is more than just deleting the file).
- When they cease to be responsible for the task which has required them to hold personal data on behalf of SENRUG, they will hand the data over to whoever takes on that responsibility, then ensure all SENRUG personal data is deleted from their own computers and electronic storage devices, and shred any paper records not handed over.

Should a SENRUG committee member holding personal data on behalf of SENRUG have any difficulty in adhering to the above requirements, or any questions or comments about this policy generally, they must raise this with the SENRUG Data Controller as stated in Section 8 and / or at a SENRUG Committee Meeting.

10. Communication of Policy

This policy is published on the SENRUG website at www.senrug.co.uk and will be specifically drawn to the attention of individuals on the Members List, Stakeholders List and Press Contacts List by email.

11. Policy Review

This policy will be reviewed at least every 3 years. The next scheduled review date is October 2021.

End (Annexes 1-6 Follow)

ANNEX 1

SENRUG PERSONAL DATA AND INFORMATION PRIVACY POLICY - LEGITIMATE INTEREST ASSESSMENT:

MEMBERS LIST

DESCRIPTION OF DATA: Statements received from the bank listing bank transactions including names and subscription amounts of members who have paid their membership subscription by bank transfer

PURPOSE TEST

Comment on:

- Why do you want to process the data – what are you trying to achieve?
- Who benefits from the processing? In what way?
- Are there any wider public benefits to the processing?
- How important are those benefits?
- What would the impact be if you couldn't go ahead?
- Would your use of the data be unethical or unlawful in any way?

The data is held to allow SENRUG to keep a list of and communicate with its members and to manage subscription renewals. SENRUG members benefit from this, as they are kept updated with SENRUG news. It would not be possible for SENRUG to have members without this processing. It is not believed to be unlawful or unethical.

NECESSITY TEST

Comment on:

- Does this processing actually help to further that interest?
- Is it a reasonable way to go about it?
- Is there another less intrusive way to achieve the same result?

SENRUG could not be a member-based organisation without this list, and SENRUG would not be able to function without members.

BALANCING TEST

Comment on:

- What is the nature of your relationship with the individual?
- Is any of the data particularly sensitive or private?
- Would people expect you to use their data in this way?
- Are you happy to explain it to them?
- Are some people likely to object or find it intrusive?
- What is the possible impact on the individual?
- How big an impact might it have on them?
- Are you processing children's data?
- Are any of the individuals vulnerable in any other way?
- Can you adopt any safeguards to minimise the impact?
- Can you offer an opt-out?

The individuals on whom data is held are individuals who have joined SENRUG. It is reasonable to presume that individuals would expect SENRUG to keep their data in this way and it is not deemed to be intrusive. There would be no significant impact of a data loss but some individuals might find it annoying if their contact details fell into someone else's hands, particularly if the member is elderly or vulnerable. There is no reason to believe any data on children is included, though there is no restriction on under 18s joining SENRUG.

DATA PROTECTION IMPACT ASSESSMENT (DPIA)

Is a DPIA considered necessary? **NO**

If YES, it must be attached

If NO, give reasons for decision below

Reasons for Not Carrying Out a DPIA

The amount and extent of the personal data held is very small. Although, in a minority of cases this data set includes Special Category data, this is data supplied by the individual voluntarily, and is likely to be in the public domain, with negligible impact should breach occur.

FINAL DECISION

	YES	NO
In simple terms: Does SENRUG's legitimate interest in keeping this data outweigh the individual's right to privacy?	✓	
In legal terms: Is processing of this data necessary for the purposes of the SENRUG's legitimate interests, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data, in particular where the data subject is a child.	✓	

Note: If the answer to either of the above question is "No", this data cannot lawfully be held under the reason of "Legitimate Interest"

Further Comments to Explain Decision

SENRUG believes that those who join SENRUG expect the organisation to retain their contact details, and sufficient safeguards are in place to protect the privacy of those that subsequently leave the organisation or lapse their membership.

	YES	NO
Is this Legitimate Interest for processing data currently included in our GDPR and Information Privacy Policy?	✓	

Note: If the answer to the above question is "No", the GDPR and Information Privacy Policy must now be updated to reflect this data is being held and why.

Decision Taken By **Dennis Fancett**

Date **16th October 2018**

Next Review Date: **October 2021**

END

Note: This GDPR Legitimate Interest Assessment Template is based on the information on the ICO website page <https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/lawful-basis-for-processing/legitimate-interests/> as at 17th July 2018

ANNEX 2

SENUG PERSONAL DATA AND INFORMATION PRIVACY POLICY - LEGITIMATE INTEREST ASSESSMENT:

BANK STATEMENTS

DESCRIPTION OF DATA: List of current members, including contact details and subscription payments. It may also include former members up to 2 years after a membership has lapsed whilst the Membership Secretary makes enquiries as to whether the membership has lapsed inadvertently.

PURPOSE TEST

Comment on:

- Why do you want to process the data – what are you trying to achieve?
- Who benefits from the processing? In what way?
- Are there any wider public benefits to the processing?
- How important are those benefits?
- What would the impact be if you couldn't go ahead?
- Would your use of the data be unethical or unlawful in any way?

The data is held to allow SENUG to keep a record of how much money it has, and to note who has paid their membership subscription by bank transfer. Bank statements are also retained to allow examination and approval of SENUG's accounts at year end. It would not be possible for SENUG to maintain financial controls without this processing. It is not believed to be unlawful or unethical.

NECESSITY TEST

Comment on:

- Does this processing actually help to further that interest?
- Is it a reasonable way to go about it?
- Is there another less intrusive way to achieve the same result?

Bank statements are necessary for SENUG to manage its finances. Call Centre or online banking only would not be sufficient as the SENUG Treasurer and Membership Secretary need to exchange information, and the Treasurer needs to submit bank statements for examination of the SENUG accounts at year end.

BALANCING TEST

Comment on:

- What is the nature of your relationship with the individual?
- Is any of the data particularly sensitive or private?
- Would people expect you to use their data in this way?
- Are you happy to explain it to them?
- Are some people likely to object or find it intrusive?
- What is the possible impact on the individual?
- How big an impact might it have on them?
- Are you processing children's data?
- Are any of the individuals vulnerable in any other way?
- Can you adopt any safeguards to minimise the impact?
- Can you offer an opt-out?

The individuals on whom data is held are individuals who have joined SENUG. It is reasonable to presume that individuals would expect SENUG to retain details of their membership subscription payments indicated by bank records. There would be no significant impact of a data loss. This data does **not** include details of a member's own bank.

DATA PROTECTION IMPACT ASSESSMENT (DPIA)

Is a DPIA considered necessary? **NO**

If YES, it must be attached

If NO, give reasons for decision below

Reasons for Not Carrying Out a DPIA

This is not Special Category data, and the amount and extent of the personal data held is very small.

FINAL DECISION

	YES	NO
In simple terms: Does SENRUG's legitimate interest in keeping this data outweigh the individual's right to privacy?	✓	
In legal terms: Is processing of this data necessary for the purposes of the SENRUG's legitimate interests, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data, in particular where the data subject is a child.	✓	

Note: If the answer to either of the above question is "No", this data cannot lawfully be held under the reason of "Legitimate Interest"

Further Comments to Explain Decision

SENRUG believes that those who join SENRUG and pay by bank transfer expect the organisation to retain and record details of their payments, and to retain its own bank statements for future reference.

	YES	NO
Is this Legitimate Interest for processing data currently included in our GDPR and Information Privacy Policy?	✓	

Note: If the answer to the above question is "No", the GDPR and Information Privacy Policy must now be updated to reflect this data is being held and why.

Decision Taken By **Dennis Fancett**

Date **16th October 2018**

Next Review Date: **October 2021**

END

Note: This GDPR Legitimate Interest Assessment Template is based on the information on the ICO website page <https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/lawful-basis-for-processing/legitimate-interests/> as at 17th July 2018

ANNEX 3

SENUG PERSONAL DATA AND INFORMATION PRIVACY POLICY - LEGITIMATE INTEREST ASSESSMENT:

COMMITTEE MEETING MINUTES AND COMMITTEE CORRESPONDENCE

DESCRIPTION OF DATA: Names of committee members attending or not attending committee meetings, actions they agree to undertake, progress they report and opinions they express. This information may be within formal meeting minutes, or emails and Word documents issued by the Chair.

PURPOSE TEST

Comment on:

- Why do you want to process the data – what are you trying to achieve?
- Who benefits from the processing? In what way?
- Are there any wider public benefits to the processing?
- How important are those benefits?
- What would the impact be if you couldn't go ahead?
- Would your use of the data be unethical or unlawful in any way?

SENUG keeps this data so its committee can function effectively by recording agreed actions, decisions and opinions expressed at committee meetings and by committee members communicating with another between meetings. Without this data, SENUG's committee would not be effective, and it would be more difficult for SENUG to achieve its campaign objectives. SENUG believes keeping this data is both ethical and lawful.

NECESSITY TEST

Comment on:

- Does this processing actually help to further that interest?
- Is it a reasonable way to go about it?
- Is there another less intrusive way to achieve the same result?

Keeping this data enables the SENUG committee to operate effectively. SENUG believes the general public accept that most organisations of its kind have a committee, that committee meetings are recorded and that for a campaigning organisation, committee members will correspond with one another between meetings.

BALANCING TEST

Comment on:

- What is the nature of your relationship with the individual?
- Is any of the data particularly sensitive or private?
- Would people expect you to use their data in this way?
- Are you happy to explain it to them?
- Are some people likely to object or find it intrusive?
- What is the possible impact on the individual?
- How big an impact might it have on them?
- Are you processing children's data?
- Are any of the individuals vulnerable in any other way?
- Can you adopt any safeguards to minimise the impact?
- Can you offer an opt-out?

The individuals on whom data is held are committee members or other people who SENUG comes into contact with as part of its activities eg stakeholders or contacts from organisations providing a service to SENUG such as exhibition organisers or meeting venue staff etc who in most cases have supplied their details voluntarily to SENUG, and would reasonably expect SENUG to use it in this way. The impact of a data loss might be an

increase in the number of unwanted calls or spam emails a person receives, but does not involve any threat to personal security. No data on children is included. Data subjects can ask to be removed from this list if they wish.

DATA PROTECTION IMPACT ASSESSMENT (DPIA)

Is a DPIA considered necessary? **NO**

If YES, it must be attached

If NO, give reasons for decision below

Reasons for Not Carrying Out a DPIA

Although this might, in a minority of instances, include Special Category data (eg the political beliefs of elected representatives), this data is in any case in the public domain. Given the extent and amount of the personal data held is very small, the extent of a breach is minimal, and the ability to request removal from this list, SENRUG does not believe a DPIA is warranted

FINAL DECISION

	YES	NO
In simple terms: Does SENRUG's legitimate interest in keeping this data outweigh the individual's right to privacy?	✓	
In legal terms: Is processing of this data necessary for the purposes of the SENRUG's legitimate interests, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data, in particular where the data subject is a child.	✓	

Note: If the answer to either of the above question is "No", this data cannot lawfully be held under the reason of "Legitimate Interest"

Further Comments to Explain Decision

SENRUG believes that it is reasonable for its committee to operate in this way and the names of committee members are other people having contact with SENRUG to be kept in this way.

	YES	NO
Is this Legitimate Interest for processing data currently included in our GDPR and Information Privacy Policy?	✓	

Note: If the answer to the above question is "No", the GDPR and Information Privacy Policy must now be updated to reflect this data is being held and why.

Decision Taken By **Dennis Fancett**

Date **16th October 2018**

Next Review Date: **October 2021**

END

Note: This GDPR Legitimate Interest Assessment Template is based on the information on the ICO website page <https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/lawful-basis-for-processing/legitimate-interests/> as at 17th July 2018

ANNEX 4

SENUG PERSONAL DATA AND INFORMATION PRIVACY POLICY - LEGITIMATE INTEREST ASSESSMENT:

STAKEHOLDER LIST

DESCRIPTION OF DATA: Names, job titles and contact details of people interested in SENUG's work, typically rail industry managers, officials of statutory bodies with responsibilities for rail policy, elected representatives and their staff

PURPOSE TEST

Comment on:

- Why do you want to process the data – what are you trying to achieve?
- Who benefits from the processing? In what way?
- Are there any wider public benefits to the processing?
- How important are those benefits?
- What would the impact be if you couldn't go ahead?
- Would your use of the data be unethical or unlawful in any way?

SENUG keeps this data so it can update these stakeholders on its work (eg by email distribution) and to have contact details to hand so that SENUG can make 1:1 contact to discuss an issue or problem with a particular company or other stakeholder. As SENUG is a campaigning organisation and user group, it would not be effective without keeping this data, and SENUG believes it to be both ethical and lawful.

NECESSITY TEST

Comment on:

- Does this processing actually help to further that interest?
- Is it a reasonable way to go about it?
- Is there another less intrusive way to achieve the same result?

Keeping this data enables SENUG to establish and retain credible working relationships with rail industry stakeholders. In most cases the data has been supplied to SENUG voluntarily eg through business cards, and SENUG believes that the people with whom it is in contact prefer direct approaches via the personal details they have supplied, rather than contact through switchboards etc.

BALANCING TEST

Comment on:

- What is the nature of your relationship with the individual?
- Is any of the data particularly sensitive or private?
- Would people expect you to use their data in this way?
- Are you happy to explain it to them?
- Are some people likely to object or find it intrusive?
- What is the possible impact on the individual?
- How big an impact might it have on them?
- Are you processing children's data?
- Are any of the individuals vulnerable in any other way?
- Can you adopt any safeguards to minimise the impact?
- Can you offer an opt-out?

The individuals on whom data is held are individuals are rail industry or other stakeholders who in most cases have supplied their details voluntarily to SENUG, and would reasonably expect SENUG to use it in this way. the impact of a data loss might be an increase in the number of unwanted calls or spam emails a person

receives, but does not involve any threat to personal security. No data on children is included. Data subjects can ask to be removed from this list if they wish.

DATA PROTECTION IMPACT ASSESSMENT (DPIA)

Is a DPIA considered necessary? **NO**

If YES, it must be attached

If NO, give reasons for decision below

Reasons for Not Carrying Out a DPIA

Although this might, in a minority of instances, include Special Category data (eg the political beliefs of elected representatives), this data is in any case in the public domain. Given the extent and amount of the personal data held is very small, the extent of a breach is minimal, and the ability to request removal from this list, SENRUG does not believe a DPIA is warranted

FINAL DECISION

	YES	NO
In simple terms: Does SENRUG's legitimate interest in keeping this data outweigh the individual's right to privacy?	✓	
In legal terms: Is processing of this data necessary for the purposes of the SENRUG's legitimate interests, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data, in particular where the data subject is a child.	✓	

Note: If the answer to either of the above question is "No", this data cannot lawfully be held under the reason of "Legitimate Interest"

Further Comments to Explain Decision

SENRUG believes that the stakeholders whose names are on this list appreciate being kept informed of SENRUG's work.

	YES	NO
Is this Legitimate Interest for processing data currently included in our GDPR and Information Privacy Policy?	✓	

Note: If the answer to the above question is "No", the GDPR and Information Privacy Policy must now be updated to reflect this data is being held and why.

Decision Taken By **Dennis Fancett**

Date **16th October 2018**

Next Review Date: **October 2021**

END

Note: This GDPR Legitimate Interest Assessment Template is based on the information on the ICO website page <https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/lawful-basis-for-processing/legitimate-interests/> as at 17th July 2018

ANNEX 5

SENUG PERSONAL DATA AND INFORMATION PRIVACY POLICY - LEGITIMATE INTEREST ASSESSMENT:

PRESS CONTACTS LIST

DESCRIPTION OF DATA: A list of media professionals and their contact details who SENUG believes are interested in its work, and to whom it sends its press releases.

PURPOSE TEST

Comment on:

- Why do you want to process the data – what are you trying to achieve?
- Who benefits from the processing? In what way?
- Are there any wider public benefits to the processing?
- How important are those benefits?
- What would the impact be if you couldn't go ahead?
- Would your use of the data be unethical or unlawful in any way?

SENUG keeps this data so it can issue press releases to specifically named journalists, including freelance journalists, or contact media publications to discuss articles or coverage of stories.

NECESSITY TEST

Comment on:

- Does this processing actually help to further that interest?
- Is it a reasonable way to go about it?
- Is there another less intrusive way to achieve the same result?

Keeping this data enables SENUG to establish and retain credible working relationships with journalists and other media professionals. This helps SENUG promote its views and campaigns and it also helps the media who are interested in the views of professional campaign groups such as SENUG.

BALANCING TEST

Comment on:

- What is the nature of your relationship with the individual?
- Is any of the data particularly sensitive or private?
- Would people expect you to use their data in this way?
- Are you happy to explain it to them?
- Are some people likely to object or find it intrusive?
- What is the possible impact on the individual?
- How big an impact might it have on them?
- Are you processing children's data?
- Are any of the individuals vulnerable in any other way?
- Can you adopt any safeguards to minimise the impact?
- Can you offer an opt-out?

The individuals are media professionals who are interested in SENUG's work, and SENUG believes would reasonably expect SENUG to keep their data in this way. The impact of a data loss might be an increase in the number of unwanted calls or spam emails a person receives, but does not involve any threat to personal security. No data on children is included. Data subjects can ask to be removed from this list if they wish.

DATA PROTECTION IMPACT ASSESSMENT (DPIA)

Is a DPIA considered necessary? **NO**

If YES, it must be attached

If NO, give reasons for decision below

Reasons for Not Carrying Out a DPIA

This is not Special Category data, and given the extent and amount of the personal data held is very small, the extent of a breach is minimal, and the ability to request removal from this list, SENRUG does not believe a DPIA is warranted

FINAL DECISION

	YES	NO
In simple terms: Does SENRUG's legitimate interest in keeping this data outweigh the individual's right to privacy?	✓	
In legal terms: Is processing of this data necessary for the purposes of the SENRUG's legitimate interests, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data, in particular where the data subject is a child.	✓	

Note: If the answer to either of the above question is "No", this data cannot lawfully be held under the reason of "Legitimate Interest"

Further Comments to Explain Decision

SENRUG believes that the media professionals whose names are on this list appreciate being kept informed of SENRUG's work.

	YES	NO
Is this Legitimate Interest for processing data currently included in our GDPR and Information Privacy Policy?	✓	

Note: If the answer to the above question is "No", the GDPR and Information Privacy Policy must now be updated to reflect this data is being held and why.

Decision Taken By **Dennis Fancett**

Date **16th October 2018**

Next Review Date: **October 2021**

END

Note: This GDPR Legitimate Interest Assessment Template is based on the information on the ICO website page <https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/lawful-basis-for-processing/legitimate-interests/> as at 17th July 2018

ANNEX 6

SENRUG PERSONAL DATA AND INFORMATION PRIVACY POLICY - LEGITIMATE INTEREST ASSESSMENT:

MEMBERS WHO HAVE JOINED OR RENEWED VIA PAYPAL

DESCRIPTION OF DATA: Names, contact details, and subscription amounts of members who have joined or renewed their membership with SENRUG by Paypal. Note: This data specifically does NOT include an individual's bank or credit card details. These details are NOT passed to SENRUG by Paypal.

PURPOSE TEST

Comment on:

- Why do you want to process the data – what are you trying to achieve?
- Who benefits from the processing? In what way?
- Are there any wider public benefits to the processing?
- How important are those benefits?
- What would the impact be if you couldn't go ahead?
- Would your use of the data be unethical or unlawful in any way?

SENRUG keeps this data for a temporary period so it can ensure Members who have joined or renewed their membership of SENRUG via Paypal can be added to our Membership List, and reconcile money transfers from Paypal to SENRUG with the SENRUG bank statements

NECESSITY TEST

Comment on:

- Does this processing actually help to further that interest?
- Is it a reasonable way to go about it?
- Is there another less intrusive way to achieve the same result?

It is not possible to transfer details directly from Paypal to the SENRUG Membership Database directly without having a very sophisticated and expensive website with enhanced online "shopping" facilities that would not be justified for the size of organisation and volume of transactions that SENRUG has. Furthermore, as SENRUG is a voluntary organisation, it is reasonable that some tasks are shared between Committee Members meaning transfer of data between them is necessary.

BALANCING TEST

Comment on:

- What is the nature of your relationship with the individual?
- Is any of the data particularly sensitive or private?
- Would people expect you to use their data in this way?
- Are you happy to explain it to them?
- Are some people likely to object or find it intrusive?
- What is the possible impact on the individual?
- How big an impact might it have on them?
- Are you processing children's data?
- Are any of the individuals vulnerable in any other way?
- Can you adopt any safeguards to minimise the impact?
- Can you offer an opt-out?

The individuals are people who have paid a membership subscription to SENRUG via its online facility which uses Paypal. SENRUG believes in such cases it is reasonable that individuals would expect SENRUG to extract their information from Paypal, and to take reasonable steps to ensure reconciliation with SENRUG's own financial

records. No data on children is included. Data subjects can pay subscriptions to SENRUG via other methods (eg bank transfer, cheque or cash) if they prefer.

DATA PROTECTION IMPACT ASSESSMENT (DPIA)

Is a DPIA considered necessary? **NO**

If YES, it must be attached

If NO, give reasons for decision below

Reasons for Not Carrying Out a DPIA

The amount and extent of the personal data held is very small and is additionally only held for a short period of time. Although, in a minority of cases this data set includes Special Category data, this is data supplied by the individual voluntarily, and is likely to be in the public domain, with negligible impact should breach occur.

FINAL DECISION

	YES	NO
In simple terms: Does SENRUG's legitimate interest in keeping this data outweigh the individual's right to privacy?	✓	
In legal terms: Is processing of this data necessary for the purposes of the SENRUG's legitimate interests, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data, in particular where the data subject is a child.	✓	

Note: If the answer to either of the above question is "No", this data cannot lawfully be held under the reason of "Legitimate Interest"

Further Comments to Explain Decision

SENRUG believes that those who join SENRUG via Paypal expect the organisation to transfer their details from Paypal to SENRUG and given SENRUG's small size, low subscription rate and voluntary status, would understand this might be via a manual process that involves temporary creation of a new data set.

	YES	NO
Is this Legitimate Interest for processing data currently included in our GDPR and Information Privacy Policy?	✓	

Note: If the answer to the above question is "No", the GDPR and Information Privacy Policy must now be updated to reflect this data is being held and why.

Decision Taken By **Dennis Fancett**

Date **16th October 2018**

Next Review Date: **October 2021**

END

Note: This GDPR Legitimate Interest Assessment Template is based on the information on the ICO website page <https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/lawful-basis-for-processing/legitimate-interests/> as at 17th July 2018