

Charterhouse Caving Company Ltd

Data Protection Policy

- Policy prepared by: Graham Mullan, Company Secretary
- Approved by Committee on 6th April 2019
- Policy became operational on 8th April 2019
- Next review date 31st April 2022

Information held by the Company:

The Company holds information on three classes of people:

- Member Club Representatives
- Charterhouse Cave Leaders
- Signatories on temporary permits

1. Member Club representatives:

In order to communicate business within the Company, it holds contacts detail in the form of email addresses, mailing addresses and up to two telephone numbers of those individuals who have been designated as representatives by member clubs.

How the stored information is held:

The full suite of information on member representatives is held only by the Secretary, who is the designated data controller, on a password-protected computer. The file is backed up on an encrypted cloud storage provider. Email addresses are also entered on a commercial listserv for the purposes of group mailshots. This list can only be accessed by the Secretary.

How the stored information is shared:

Information on member representatives is shared with the government agency “Companies House” in the case of those elected as directors and/or secretary in order to fulfil our legal obligations. This information on these individuals is publicly accessible.

2. Charterhouse Cave Leaders:

In order to facilitate and manage access to Charterhouse Cave, the Company holds contact details in the form of telephone numbers and email on those individuals who have been appointed as leaders for the cave.

How the stored information is held:

The full suite of information on member representatives is held only by the Secretary, who is the designated data controller, on a password-protected computer. The file is backed up on an

encrypted cloud storage provider. Email addresses are also entered on a commercial listserver for the purposes of group mailshots. This list can only be accessed by the Secretary.

How the stored information is shared:

Information on leaders may be shared with third parties in order to facilitate access to the cave. It is not shared with other agencies or for any other purpose.

3. Signatories on temporary permits

Information is held on individuals who have requested access permits directly from the Secretary. This may include mailing addresses, email addresses and telephone numbers. This information is held on only by the Secretary, who is the designated data controller, on a password-protected computer. The file is backed up on an encrypted cloud storage provider. The information is also held on paper as NCR copies of the issued permits.

How the stored information is shared:

This information is not shared with other agencies or for any other purpose except as necessary either for insurance purposes or to manage access to the caves.

Subject access requests:

All individuals who are the subject of personal data held by the Company are entitled to:

- Ask **what information** the Company holds about them and why.
- Ask **how to gain access** to it.
- Be informed **how to keep it up to date**.
- Be informed how the Company is **meeting its data protection obligations**.
- Be informed that information no longer required to meet the Company's purposes and obligations will be deleted if a '**right to forget**' request is made.

If an individual contacts the Company requesting this information, this is called a subject access request.

Subject access requests from individuals should be made by email, addressed to the data controller at secretary@charterhouse-caving-company.ltd.uk. The data controller will aim to provide the relevant data within 14 days.

The data controller will always verify the identity of anyone making a subject access request before handing over any information.