



## **Droitwich Spa German Twinning Group**

### **Data Protection Policy**

Droitwich Spa German Twinning Group (DSGTG) holds minimal personal data about its members, which is updated annually as part of the membership cycle. We have a Data Protection Policy which explains our holdings, procedures, and compliance with the EU GDPR (General Data Protection Regulation) which came into force in May 2018.

### **Organisation and Mission**

DSGTG exists to facilitate communication and visits between residents in the area around Droitwich Spa in the UK, and those around Bad Ems in Germany. To achieve that mission, it needs to collect and use personal information about its member families, and those of the corresponding host families in Germany. DSGTG is a “Voluntary Association” rather than a company or charity, so its administration is minimal, and its data protection requirements are therefore relatively simple.

### **Personal Data Collected by DSGTG**

The personal data DSGTG collects are names, addresses, email addresses, and telephone numbers of association members. It also collects age information for family members including children, in order to best match families with German host families.

### **Data Administration**

The Chairperson created this policy, and acts as Data Protection Officer where necessary. The Membership Secretary of the association is the primary data holder, and the primary contact for questions about personal data held by DSGTG. The Treasurer is the holder of finance data. Personal data is typically held in the form of spreadsheets on domestic personal computers owned by committee members, and subject to conventional domestic access controls.

### **Data Sharing**

The personal data held by DSGTG is not shared outside the association, other than as described below with Germany. It is fully available to the elected committee, and a list of contact information (names, addresses, telephones email addresses, ages) is provided to all member families to facilitate sharing of resources for twinning visits.

In preparation for the twinning visits to and from Germany, the contact information and family ages are shared with the parallel association in Bad Ems, and through them to the German families partaking in the visit. In return, DSGTG and its families receive similar information about the German families.

### **Data Retention**

Personal Data collected will be held as long as the data subject remains member of the association, and for up to a year afterwards, with such records being purged from active lists by the next membership renewal cycle. Backup copies may exist longer as part of regular system backups, but will not be processed.

## **Data Protection and the GDPR (General Data Protection Regulation)**

In May 2018, a new data protection regulation comes into force - the GDPR from the European Union (See the [EU GDPR Regulation](#)). The GDPR includes the following rights for data subjects:

1. right to be informed;
2. right of access;
3. right to rectification;
4. right to erasure;
5. right to restrict processing;
6. right to data portability;
7. right to object; and
8. right not to be subject to automated decision-making including profiling.

Of these, items 6 and 8 are not relevant to DSGTG. For all the other rights, data subjects (who will be members of DSGTG) should initially contact the Membership Secretary of the association ([membership@droitwich-twinning.freesevers.com](mailto:membership@droitwich-twinning.freesevers.com)) who will instigate the appropriate process with the assistance of appropriate members of the committee.

### **Lawful Basis for processing personal data**

The GDPR sets out a set of lawful bases as the only allowable justifications for processing personal data. The DSGTG relies on "Legitimate Interest", as the minimal personal data collected for annual membership is necessary for the functioning of the twinning, and its use as described has little privacy impact on the data subjects.