

MONSON CLUB LTD DATA PROTECTION POLICY

Data Protection Policy, Monson Club Ltd, Lyndale Road, Redhill, Surrey. RH1 2HA

The Monson Club will comply with all statutory requirements of the Data Protection Act & the General Data Protection Regulation. The Data Protection Act protects individuals' rights concerning information about them held on computer. The Club operates a CCTV system that records images 24 hours a day for the safety and security of Staff, Members and Guests. It is also used for crime prevention. The Club complies with the Data Protection Act (DPA) the CCTV Code of Practice and other relevant legislation.

Access to recordings / live images are strictly controlled and the Club's CCTV system is registered under the Data Protection Act. The Club Secretary is the registered Data Controller.

The recorded images or live images may be used to ensure the safety and security of staff, members, guests, club stock and equipment. CCTV images, (both recorded and live) can be used as evidence for an investigation (for any purpose as authorised by the Management Team.) Images collected from the system could be used as evidence for a potential disciplinary offence under our disciplinary procedures and may also be made available to the Police. CCTV footage may also show images of other staff and Members not involved in any offence / crime.

The Club recognises that CCTV Images contain personal information and therefore to comply with the DPA they cannot be disclosed or released. However, section 35(2) of the DPA exempts the CCTV images from the non-disclosure provisions of the DPA where they are used for the purposes of, or in connection with, legal proceedings. Staff and Members should be aware that the disciplinary proceedings could constitute legal proceedings in the light of any alleged criminal activity, and therefore the use of the images in connection with the disciplinary proceedings is exempt from the non-disclosure provisions of the DPA.

The Club is required to hold a database of Members including residential addresses and email addresses. These details are kept secure on security protected databases and access is restricted for Club operational purposes only. All Members are signed onto a mailing list for Club business including but not restricted to letters and emails unless they opt out in writing. The information which is provided on membership forms and any other information obtained or provided during the course of applications or for renewal of membership will be used solely for the purpose of processing the application (including payment processing) and Club business as described above. The data will not be shared with any third party for marketing or commercial purposes without firstly obtaining the explicit consent of the Members concerned.

Employees and Members can request access to the information held on them by the Company. All requests to gain access to records should be made in writing and there may be charge for this service.

The Management Committee has the overall responsibility for implementing the Policy and the planning, organisation, control, monitoring and review of this policy.

January 2018