

GDPR Website Policy

1. All documents to be considered for uploading will be checked for personal data. If personal data is contained, then the website officer will consider:
 - a) Why the data is in the document;
 - b) Has the person whose data is disclosed given their consent for website publication. How and when was this consent obtained and how can it be revoked;
 - c) Has the person seen a copy of the privacy notice surrounding the handling of their data;
 - d) Has the document to be uploaded been recorded in the Website Document Publication Register;
 - e) Does the document contain only the minimal amount of data required;
 - f) Is the data accurate;
 - g) When will this data be deleted from the website and an Outdated Page Removal request sent to Google docs;
 - h) Are the appropriate technical and organisational security measures in place;
 - i) What is the perceived privacy risk to the person concerned.

The website officer will assess whether the processing of the personal data in the document will be in accordance with the six data protection principles in the GDPR, taking into consideration the answers to these questions.

If the website officer is satisfied that the processing will be GDPR compliant then the document may be published.

2. All documents uploaded that contain personal data will be added to the Website Document Publication Register. Recorded is the date data was received, a description of it, who/where it is from, has consent for upload been given, when is the data to be deleted by and when was it deleted securely and a removal request sent to Google docs.
The Register is reviewed on a fortnightly basis to endure that is current, accurate and that deletion dates are adhered to.
3. Data received via the Email Subscribers Plugin will be reviewed fortnightly. If persons have requested subscription but not confirmed this by clicking the link provided, the 'Resend Confirmation' button will be clicked. If no confirmation of subscription is received within one month of first request then the personal data held will be deleted.
As part of the review process, email addresses that have been added since the last review will be downloaded and added to the Newsletter Subscribers Status list in Dropbox. Once the details on that list are confirmed as having been added to the Constant Contact mailing list by the Newsletter Officer, they will be securely deleted from both the Plugin and Dropbox.
Maximum holding time in either place will be one month from the date of receipt.
4. If, for any reason, the Web Officer is unable to access WordPress or Dropbox then the Officer with backup access to both these document storage areas will be notified and the necessary reviews and/or document deletions carried out by him/her.

5. Personal data from a public source may be uploaded only if the organisation from which it was obtained is either compliant with GDPR or the US Privacy Shield.
6. Backups of the WordPress database will be carried out monthly and the backup file stored in Dropbox.
7. Requests by individuals to access the personal data processed via the website should be directed to the Chair of SEEIG. The website officer will support the Chair to respond to subject access requests in accordance with the SEEIG policy, and the GDPR.
8. Privacy notices will be supplied to all data subjects whose data is processed via the website, and also more generally via SEEIG. These will be published on the website. The website officer will ensure that the most recent versions are uploaded.
9. Any questions concerning this policy, or data protection in general, should be directed to the Chair of SEEIG (chair@oasouthandeastengland.org.uk)