

**Hurley Owners Association**  
(Referred to in further documentation as the HOA)

**Data Protection Policy**

**Introduction**

1. This policy is established by Hurley Owners Association Present Committee and is intended to ensure that the Association complies with the General Data Protection Regulations 25<sup>th</sup> May 2018 and the 2017 Data Protection Bill.

**Principles of implementing GDPR**

2. The following is a summary of the principles of Data Protection applied by HOA, taken from the ICO Guide to GDPR (ICO; 16<sup>th</sup> April 2018; 11.05)
3. Data is to be processed lawfully and in a transparent manner.
  - a. Data is held and processed only for the specific and legitimate purpose of administration of HOA affairs.
  - b. Only that data which is strictly necessary shall be held.
  - c. Data shall be maintained up to date and be accurate.
  - d. Permission for Data to be stored, used and processed for the purpose of HOA administration shall be Freely Given and Unambiguous.
  - e. Personal Data held shall be given appropriate security against loss, unlawful or unauthorised processing, and only held for 12 months. Details of (Boat type, Boat name, and Location) may be kept for Historically Value.
  - f. The association committee officers who hold any data are responsible for its security and are to be able to demonstrate compliance with the principles.

## Personal data held

4. The table below summarises the personal data held by the Association, the custodians and the purpose for which it is being held. The Association does not 'process' personal data in the manner generally assumed by GDPR, and is only used for the Administration of a Contract with a member.

<b>Data Type</b>	<b>Held by</b>	<b>Purpose</b>
Contact Details, containing individuals name, Postal address, and email address.	Data Controller in electronic format with processing done by the Membership Secretary / Treasurer.	To Administer the Members Contract. Communication.
Selected Committee members HOA allotted contact email addresses	Published on Association web site,	Communication

All Personal Data held by the HOA is only held for the term of the membership 12 month Contract.

The current password protected Electronic Data is held by the Data Controller and can be contacted through the Membership Secretary.

Members also have the right for their electronic personal details and permissions granted to be revised or removed from HOA files held at any time during their membership of the HOA.

Members who are included in the Association Directory circulated to members annually may not have their details edited or removed, as they are posted out to members, and are therefore NON Retrievable.

Committee HOA allotted contact email addresses are included on the HOA website, and any hard copy documents sent to Members.

## GDPR Accountability - Lawful basis for holding and processing personal data

5. The principal lawful basis for holding individuals personal data is that it is **Required for the Specified Explicit and Legitimate Purpose for the Performance of a Contract**. In other words, the holding and use of individuals' personal data by the HOA is on the principle that the data is provided on an entirely voluntary basis, and is **Freely Given**. It will only be used for the Lawful Basis of Processing Data, which is required, **For the process and Performance of a Contract with the member**.
6. **Note: It will not be processed for any other purpose other than providing a Member's Contract or used for communication, and will not be made available to any other individuals for any other purpose. It will be kept in a recognised accepted secure manner, ' ADEQUATE AND PROPORTIONAL TO THE DATA WE HOLD '.**
7. The GDPR provides for the following rights for individuals:
  - The right to be informed
  - The right of access
  - The right to rectification
  - The right to erasure
  - The right to restrict processing
  - The right to data portability
  - The right to object
  - Rights in relation to automated decision making and profiling
8. The lawful basis of **Legal Obligations** is assumed to apply to financial data held – i.e. the need to comply with accounting law and practice.  
Note: No financial bank account details are held by the Association. Details are held and kept secure by the Association Bank, H.S.B.C, and their own security system.

## Security

9. Hard copy and electronic data residing on any personal computer owned by an individual HOA Committee member may be held in that officers home provided that it is given appropriate security and password protected. This means that access to the data is restricted to the Appointed Committee

Member, and that any Hard Copies enjoy the usual level of physical building security of a person's private home.

Implemented : April 2018