

Data Protection and Comberton Twinning Association

Organisation and Mission

Comberton Twinning Association (CTA) exists to facilitate communication and visits between residents in the area around Comberton in the UK, and those around Le Vaudreuil in France. To achieve that mission, it needs to collect and use personal information about its member families, and those of the corresponding host families in France. CTA 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 CTA

The personal data CTA collects are names, addresses, emails, and telephone numbers of association members. It also collects age information for family members including children, in order to best match families with French host families. Finally, it holds bank account details for members paying by electronic funds transfer.

Data Administration

The Chairman created this policy, and acts as Data Protection Officer where necessary. The Secretary of the association is the primary data holder, and the primary contact for questions about personal data held by CTA. The Treasurer is the holder of finance data such as bank account numbers of members paying electronically. Personal data is typically mastered 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 CTA is not shared outside the association, other than as described below with France. It is fully available to the elected committee, and a list of contact information (names, addresses, telephones emails, ages) is provided to all member families to facilitate sharing of resources for twinning visits.

In preparation for the twinning visits to and from France, the contact information and family ages of those involved are shared with the parallel association in Le Vaudreuil, and through them to the French families partaking in the visit. In return, CTA and its families receive similar information about the French 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 typically being purged from active lists at the next membership renewal cycle. Summary lists of past membership may be kept for up to five years, to allow historical analysis. Contact information for Affiliates (past members who wish to be kept informed) will be kept for up to five years. Backup copies of personal data may exist longer as part of regular system backups, but not 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:

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

Of these, items 6 and 8 are not relevant to CTA. For the other rights, data subjects (who are or were members of CTA) should initially contact the secretary of the association (secretary@combertontwinning.org.uk) 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 CTA 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.

Paul Hardy, Chairman, 13-Jan-2018, revised 24-May-2018.