

# OMEP UK GDPR Policy

**This policy is concerned with the procedures we adopt in** collecting, storing, and use of personal data. It is a document that is required in compliance to the General data Protection Regulation (GDPR) legislation and should provide a public and transparent account of our practices in gaining consent, the holding, sharing and use of people's data.

GDPR defines **personal data** as "any information relating to an identified or identifiable natural person." The legislation also formally defines **sensitive personal data** and as a voluntary organisation our policy is to **never** collect or hold any such data related to e.g. racial or ethnic origin, health, political affiliation etc.

## Data Collection

Members are clearly informed of the limitations in our use of their data on application. We also have a responsibility to ensure that the data we hold on individuals remains correct. A request to check the records that we hold on individuals is therefore communicated each year in a subscription reminder email (sent at least one month before expiry).

## Data Use

Personal data may only be used for the purpose that it was originally agreed (e.g. on application for membership) that it is to be used for. This includes:

The provision of OMEP updates and newsletters.

The marketing of (discounted) OMEP conferences and events.

OMEP UK will not pass the personal information of members on to any third parties unless further consent has been gained.

## Data Management

It is important to keep data accurate and up to date and it is also important that data is not kept longer than its intended purpose. The Charity's financial year runs from 31<sup>st</sup> July each year and for accounting purposes personal data related to active memberships, cancelled and lapsed memberships are held for a period of only five years.

## Data Storage and Access

As a general principle data is shared within OMEP UK on a strict basis of a 'need to know'. Data are held on two secure spreadsheets: A 'Membership List' that is regularly updated for the purpose of mailings. A 'subscriptions ledger' that is regularly reconciled with Bank Statements and Paypal Records. A single copy back-up of this data is held off line to avoid any potential data security breach. Access to the membership database files is exclusively restricted to the elected officers of the charity, and they are required to comply with all the provisions of this policy. Third-party providers, such as payment gateways and other payment transaction processors, that are used by us will only collect, use and disclose your information to the extent necessary to allow them to perform the services they provide to us. For these providers, we recommend that you read their privacy policies so you can understand the manner in which your personal information will be handled. Once you leave our website or are redirected to a third-party website or application, you are no longer governed by this Privacy Policy.

## Online Video Privacy<sup>1</sup>

Zoom and other online conference platforms require the formal permission of each user before a video of the meeting/seminar is recorded. It is important to ensure that this is a fully *informed* consent. This policy is therefore posted clearly for users on zoom, or any other conference platform that is applied by the charity. The policy is also to be regularly reviewed and posted online. This policy shall apply to *the* video recording or transcription of any and every meeting, seminar or event facilitated using OMEP UK online services:

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<sup>1</sup> *This video policy has been developed in the light of recent advances in the use of AI 'Deep Fake' applications. UK GDPR has also introduced a right for individuals to have personal data erased. This right to erasure is also known as 'the right to be forgotten'.*

- Without further written agreement from every participant, no video or any other electronic recording by OMEP UK will ever be streamed or reproduced, in any way for public or open access on the internet, or through any other distribution service.
- Any/all recordings are made strictly for the use of those in attendance, or for the use of any member of the OMEP UK National Executive or individual who has by some other means formally agreed to the terms of this policy.
- All video or other such recordings and transcriptions will be held securely offline or in secure cloud storage by OMEP UK for a period of up to one year, and then they will be permanently erased and rendered unrecoverable.
- Where recordings are shared/downloaded from OMEP UK, all users of such recordings undertake to permanently erase and render unrecoverable the relevant material within one month of receipt.
- Individuals have the right, and are hereby granted permission to hold any *edited recording* or transcription of **exclusively** their own images or words, however derived from the above sources for their own use, application or distribution, irrespective of the agreements applied above which relate to the recording and transcription of materials featuring the images or words of other individuals/users.

*In agreeing to a recording being made, every user confirms their acceptance of the above policy.* They also accept, in the event of their consequent access to any recording or transcription, their own individual role, responsibility and personal liability in the enforcement of this policy.

#### **Individual Rights under GDPR**

We respect the right of members to request details of the individual data records that we hold for them at any time. This policy is posted on the OMEP UK website and individuals are advised here, and in every official email communication, of their right to withdraw their consent to use holding personal information at any time.

**Text:** *We respect the right of members to request details of the individual data records that we hold for them at any time. The OMEP UK GDPR Policy may be viewed [here](#). You also have the right to withdraw your consent to us holding your personal information at any time. Please address this request to: [ukomep@gmail.com](mailto:ukomep@gmail.com) Note: This will result in the cancellation of your membership, and your removal from the mail list.*

#### **GDPR Policy Review**

This policy will be reviewed on a rolling two year basis, or at any point when the relevant legislation is amended if that occurs sooner.

**Policy Revised:** 9<sup>th</sup> January 2024  
National Executive Committee

#### **Refs**

<https://bills.parliament.uk/bills/3430/>

<https://www.civilsociety.co.uk/news/charities-must-comply-with-gdpr-from-today.html>

<https://www.dataguard.co.uk/blog/gdpr-for-charities-a-complete-guide>