

PHILIPS ELECTRONICS PENSIONERS ASSOCIATION

PRIVACY POLICY

From time to time, we may need to update this policy. The latest version will always be available on the PEPA website.

In the following, Philips Electronics Pensioners Association may be referred to by its abbreviation PEPA, or simply as the "Association".

Introduction

PEPA's Privacy Policy is organised under seven General Data Protection Regulation (GDPR) principles. We have added an Appendix which explains the overall structure of our membership database, and what each membership record holds.

1. Lawfulness, fairness, and transparency

On applying to join PEPA, each prospective member completes an application form to provide the personal data necessary for the purposes of the Association's legitimate interests as a membership organisation. On enrolment, each new member receives a copy of the Association's Rules, paragraph 3 of which confirms the Association's purposes: *"The aims and objects of the Association are to maintain connections and bonds of friendship between members, to cater for the interests of members and periodically to report the activities of the Association and matters of interest to them."*

PEPA's Membership Secretary will provide a member with a full account of the personal information we hold for them, should they require it.

2. Purpose limitation

Members' personal data is stored and maintained solely to meet the published aims and objectives of the Association. This includes, but is not limited to, the provision of a regular "PEPA Newsletter" either by post or via a password-protected section of the Association's website. As part of PEPA's support of its membership community, the PEPA Newsletter routinely contains information about our members. This includes achievement of milestone anniversaries, and notification of death.

Posted Newsletters are arranged through a third-party company, and we ensure that the addressing information we provide to them is handled with the obligatory level of data protection, and is not used for any other purpose. Members' personal data is not shared with any other organisation or company.

Part of PEPA's remit is to keep its members in touch with each other. If we receive an enquiry about a member, no personal data is divulged to the enquirer. We simply forward the enquiry to the member, so they can decide what to do.

Members attending the Association's social and other functions may appear in photographs taken at the time, and made available to members in a password-protected section of the Association's website, or in the Newsletter.

3. Data minimisation

The member information PEPA holds is at a level necessary and sufficient for the Association to meet its objectives. Any specific item of personal data will be removed at a member's request, with the exception of name and one method of contact (postal address, email address, or phone number), without which the member has effectively left the Association.

PEPA does not record any sensitive personal data, referred to in the GDPR as "special categories of personal data".

The GDPR categorises IP addresses and some website cookies as personal data. PEPA has access to the IP address of any PEPA website visitor, but no attempt is ever made by PEPA to

associate an IP address with a particular person. A cookie is used for password management, and no attempt is ever made by PEPA to associate a cookie with a particular person.

4. Accuracy

Each membership record is created from information provided by the member when they join the Association. Subsequent updates to a membership record, such as a change to a postal or email address, will be made at the request of that member. If we are notified by a member's Pension Provider, or next-of-kin, that the member has died, we will update the records accordingly.

5. Storage limitation

A member's record will be kept in the main part of the membership database until the member either dies, leaves the Association for some reason, or contact with them is lost. Records for deceased members are kept so that any subsequent enquiries can be answered. If requested to do so by next-of-kin, we will remove a deceased member's record. Records for "lost contact" members are kept so that their membership can be reinstated should contact be subsequently re-established.

6. Integrity and confidentiality

PEPA's Membership Secretary controls and maintains PEPA's membership records, and changes to the data are made by no other person. The data is kept securely on a personal computer, in password-protected form. It is not available in printed form. A copy of the records is provided to a limited number of Committee members who have a legitimate reason for accessing the data, and also to protect against loss. Whenever data is transferred, it is encrypted. There is no physical connection between the PEPA membership database and the PEPA website. If an email address needs to be placed on the PEPA website, it is implemented as a graphic, to prevent unauthorised access.

7. Accountability

The scale and nature of PEPA's operation means that there is no statutory requirement for a Data Protection Officer to be appointed. The person responsible for ensuring that the Association discharges its obligations under the GDPR is PEPA's Secretary.

Appendix – PEPA's Membership Records

PEPA's Membership Secretary maintains a Membership Database on computer, to enable proper functioning of the Association. This is in three separate sections: Members, Deceased, and Lost Trace. The main information held for each member is: Title, Initials, Surname, Date of Birth, Postal Address, Email Address (when provided), Phone Number (when provided), Company, and Date of Joining PEPA. In addition, there are some administrative fields which do not contain any personal data. These are, for instance, to assist with Newsletter label printing, and to record the date that changes are made.

When a member dies, their record is moved from the Members section to the Deceased section. Should contact be lost with a member, their record is moved from the Members section to the Lost Trace section. If contact is re-established, their record is moved back into the Members section.