

## **KESWICK MOUNTAINEERING CLUB (KMC): General Data Protection Regulation (GDPR) – Legitimate Interest Assessment.**

### **1: Identifying the Legitimate Interest of the KMC to collect, hold and process members' data:**

The KMC has a legitimate interest in collecting, holding and processing the following data of members: Name, address, phone numbers, e-mail address, and (by mutual agreement only) details of person/s to be contacted in case of emergency.

We need to process this information for the following purposes:

- To provide details of membership to the British Mountaineering Club so that members may benefit from the BMC's public liability (third party) insurance cover and any other benefits which may be available from the BMC to members of affiliated clubs.
- To communicate with members about club activities.
- To communicate with members about membership renewal.
- To communicate with members about relevant administrative matters such as changes to subscription rates, club articles of association, club annual accounts, committee changes.
- To ensure the safety and welfare of Club members, for example knowing who to contact in the event of an emergency.

The people who benefit from the processing of this data are the members of the KMC. By holding such data they are enabled to participate fully in the activities of the club.

If the KMC did not hold this basic level of data, we would not be able to communicate effectively with club members. In particular, we deem it necessary to hold e-mail addresses in order to provide real-time up-dates regarding activities, such as changed dates, times, and venues for meets.

We believe the purposes for which we are processing this data is both ethical and lawful. We undertake never to collect, keep or process data that is not necessary to the effective running of a mountaineering club, never to sell data, and never to pass data on to any third party with the exception of the BMC.

### **2: Necessity Test:**

Our approach to processing data is as follows:

- Members will be required to provide their name and a postal address as an absolute minimum. In addition they will be invited to provide telephone numbers, emergency contact, and an e-mail address. This information will be maintained on a central data-base, which can only be accessed by members of the KMC committee. Names and e-mail addresses, with the active consent of the members concerned, will be held in a shared data-base. This is to enable members to make contact with each other at their own discretion; and to enable committee members and meet leaders to contact members with regard to club activities.

We believe this to be the minimum amount of data required to enable the effective operation of the club and to enable members to benefit fully from their membership. We believe this to be a reasonable approach, with intrusion into the privacy of members kept to an absolute minimum.

### **3: Balancing Test:**

- Members will only be required or invited to provide basic contact information, such as they would be asked to provide in order to access many other public or commercial services. We will not hold any data that would be considered particularly sensitive or private.
- We believe that people actively choosing to join a mountaineering club would expect their data to be used in the ways described and we are confident in our ability to explain to members why we process their data and use it in the way that we do.
- The impact upon the individual will be positive in that they will be enabled to join in club activities and to make contact with other club members.
- Individual club membership is not open to persons under the age of 18. Minors may come to meets only if accompanied by a parent, legal carer/guardian or other person legally fulfilling the role of 'in loco parentis' who is also a member of the club. Therefore we will not hold data on children and young people.
- We will offer members the choice of opting out of their details being shared with other members, on the understanding that this will limit the ability of the club to up-date them on club activities, other than through the club's website (which will not carry real-time alterations) or via the club's Facebook presence (to which they must opt-in on a personal basis).

### **4: Conclusion:**

On the basis of the above, we believe that the Keswick Mountaineering Club has a Legitimate Interest in processing members' data in the way described.

We will undertake to update and amend the membership application form and online databases in accordance with the GDPR, to maintain and update databases in a timely manner and to develop a privacy policy which will be published on the Club's website.

### **ASSESSMENT UNDERTAKEN BY KMC COMMITTEE on 4<sup>th</sup> May 2018**

Stuart Watson – Chair

Jim Fairey – Secretary and Treasurer

Fiona Cox – Meets Secretary

Judith Brown – BMC Rep.