



## The Weimaraner Association Data Retention Policy

The Weimaraner Association (WA) follows Kennel Club guidance to ensure that it is compliant the General Data Protection Regulation (GDPR). This policy should be read in conjunction with the WA's Data Privacy Policy.

The WA retains personal data for as long as necessary to fulfil the purposes for which it is/was collected, including for the purposes of satisfying the Kennel Club and any legal, accounting, or reporting requirements.

### **Retention Policy**

The Weimaraner Association will only retain personal data for as long as necessary to fulfil the purposes for which it was collected including for the purposes of satisfying any legal, accounting, or reporting requirements.

Personal data can be further processed and stored for archiving in the public interest and statistical and historical research purposes. When doing so we will consider: any link to the initial purpose, the context the data was collected in, the reasonable expectations of members/ exhibitors/ competitors/ judges, the nature of the data, the consequences of further processing and the existence of appropriate safeguards. Also, whether such data can be 'anonymised' if being preserved for archives.

### **Exit Obligations on Officers and Committee Members on departure from office/committee:**

The Hon. Secretary as designated GDPR Data Controller retains the official archive of all Association business, which will be referenced when data subjects seek access to data being processed by the Association out of contractual necessity, and other reasons such as governance, discipline and complaints. Data will be routinely purged as described below according to the appropriate purging cycle.

On departure from committee, officers and committee members must purge all emails, sent and received during their time on committee, and also remove from all types of archiving or storage media. The Data Controller will issue an "Exit Obligations" directive to each departing officer or committee member requiring mandatory compliance. The directive will cover emails, other documents such as committee meeting agendas and minutes, internal reports and status reports, electronic or hard copy, sent or received while in service on the committee. Also included are any working papers or records generated as part of portfolio responsibilities.

Compliance with the directive is to be performed within 10 working days of the issuance of the directive by the Data Controller. Compliance must be verified by the departing officer or committee member by a formal statutory declaration of same to be in the hands of the Data Controller by the 10<sup>th</sup> working day from the date of the directive. Beyond the 10<sup>th</sup> working day it will be a breach of S170 of the Data Protection Act to be in unauthorised possession of Association data, unless an extension is granted in writing by the Data Controller. Ultimately other legal measures will be undertaken to secure full compliance.

**Financial Records:**

There is statutory requirement to keep financial records for seven years. However, records may be kept for the last eight years, in order to ensure that year ends are available. Unless there was an incident which was of particular significance beyond the eight-year point, bank statements, cheque stubs etc. will not be retained.

**Membership Lists:**

Old membership lists may have some historical value and/or statistical value. The Weimaraner Association will consider how long is practically useful.

**Constitutions:**

Out of date constitutions come into the same category. Whilst details of changes will be included in AGM reports, there may be a historical interest in retaining original versions where possible, and which can be displayed as part of commemorative exhibitions.

**Show Catalogues & Results:**

Show catalogues and Results provide a gold mine of information and statistics, as well as forming an important historical record. Show Results may be published on the WA website, WA email bulletins, in the WA Newsletter, social media sites (e.g. Facebook) and other outlets including Sponsors. If required, information is shared with the Kennel Club. Show entry forms are retained for up to eighteen months after the relevant show. The WA preferred way to process entries is electronically via Fosse Data Systems, who have their own privacy policy (see below). Such data may be retained longer if necessary, in support of accountancy and audit requirements, but no longer than the records pertaining to the related accounting year in which it arises.

**Field Trial and Other Field Event Schedules, Entries, Running Orders and Results:**

Field Trial and other Field Event Schedules and Results provide a gold mine of information and statistics, as well as forming an important historical record. Field Trial Results may be published on the WA website, WA email bulletins, in the WA Newsletter, on social media sites (e.g. Facebook) and other outlets including Sponsors. If required, information is shared with the Kennel Club. Manual entry forms are retained for up to eighteen months after the relevant trial, or field event. The WA preferred way to process entries is electronically via data productivity tools such as Excel spreadsheets. Such data may be retained longer if necessary, in support of accountancy and audit requirements, but no longer than the records pertaining to the related accounting year in which it arises.

**Training and Educational Events:**

Reports on Events may be published on the WA website, WA email bulletins, in the WA Newsletter, social media sites (e.g. Facebook) and other outlets including Sponsors. Entry forms are destroyed once no longer needed.

**Committee and AGM/SGM Minutes and Documents:**

Committee minutes and documents relating to AGMs and SGMs must and will be retained as the definitive record of all WA business together with the decisions made and policies agreed. Also as an information resource to resolve any procedural issues or disputes. If required, information is shared with the Kennel Club.

**Emails Sent and Received:**

Emails circulating between officers and committee members and forming official business of the Association to deliberate on which matters are to be put on the committee agenda become eligible

to be purged in an bi-annual cycle if the central subject item has made the agenda, as the formal committee meeting minutes recording discussions and decisions will become the document of record. For those emails concerning content which did not make the agenda, the Data Controller will routinely purge such that they are completely removed from the records by at least the third year from origination.

Emails to and from members concerning questions, complaints and official responses are processed through the Honorary Secretary and shall be retained for up to 5 years if they relate to matters of governance, discipline, or significant or protracted complaints.

Emails shared by committee members on matters not properly the official business of the Association are discouraged, and will be discarded from the official record.

**Email Mailing Lists and Printed Newsletter:**

The WA maintains MailChimp mailing lists for use for member business (AGMs, SGMs etc) and informal updates. The list for member business is updated as members join and leave and reviewed annually for late payers. The second list for informal updates requires that list members opt-in. The WA Newsletter is sent to all members electronically or by post if requested.

**WA Website:**

The WA website forms an online record of Association activities. Backups are retained for a rolling 18 months to allow for the recovery of the website as needed.

**Links to Third-party Policies:**

Facebook: <https://www.facebook.com/about/privacy/update>

Fosse Data Systems: <http://www.fossedata.co.uk/help/privacy.html>

Kennel Club/Judges Critiques: <https://www.thekennelclub.org.uk/privacy-policy/>

MailChimp: <https://mailchimp.com/legal/privacy/> and <https://mailchimp.com/legal/terms/>