

## Introduction

The General Data Protection Regulation (GDPR) was passed in 2016 and comes into UK Law on 25<sup>th</sup> May 2018.

CMSUK have always followed strong data protection principles. However, the instigation of the new data protection regulations has prompted CMSUK to publish its policies, in as plain English as possible, to provide assurance and clarity to its membership and other associated contacts.

GDPR principles relating to processing of personal data (Article 5 GDPR):

• <b>Lawfulness, fairness and transparency</b>	Processed lawfully, fairly and in a transparent manner
• <b>Purpose Limitation</b>	Collected for specified, explicit and legitimate purposes and not further processed in an incompatible manner
• <b>Data minimisation</b>	Adequate, relevant and limited to what is necessary
• <b>Accuracy</b>	Kept accurate and up-to-date
• <b>Storage limitation</b>	Not kept, any longer than necessary, in a form which permits identification of a Data Subject
• <b>Integrity and Confidentiality</b>	Appropriate security ensuring protection against unauthorised or unlawful processing and against accidental loss, destruction or damage

The CMSUK GDPR policy will comply with the above principles and cover the following:

- How CMSUK gathers information
- How CMSUK securely stores information
- How CMSUK complies with reasonable requests for information it holds
- How CMSUK evidences its GDPR practices in the event of an Audit

The role of Data Protection Officer (DPO) will be assigned by the CMSUK Board of Directors to a Board member (Currently the Vice Chair). The DPO will be appointed in order to:

- Inform and advise the organisation and its employees about their obligations to comply with GDPR and other data protection laws.
- Oversea the review of policies and audit plans.
- Oversea the training of all employees and volunteers as to their data protection responsibilities.

## 1 How CMSUK Gather Information

### 1.1 Membership Profile Database

Membership details are supplied by the member when applying for membership. Members can access their online profile at any stage using their login and password details created at the point of application. Member contact details as well as other criteria of membership information can be amended by the member at any point. Some member information relating to criteria of membership such as 'areas of expertise' and 'professional associations' need to be amended via email request to CMSUK Admin. This is to protect the criteria of membership. Member information is reviewed by CMSUK annually at the point of renewal and any issues found are raised with the member and actioned accordingly at that point.

### 1.2 Event Attendee Information

Delegate, speaker and sponsor details are supplied by the individuals as part of the booking / planning process.

### 1.3 Contact List Database

Contact list details are supplied by the contact via the CMSUK website.

### 1.4 General Enquirers / Complainants

Contact and enquiry / complaint information will be supplied by the enquirer / complaint via website, email or letter.

### 1.5 Employee / Board Directors / Committee Volunteers

When individuals apply to work at CMSUK, we will only use the information they supply to us to process their application. Where we want to disclose information to a third party, for example where we want to take up a reference or obtain a 'disclosure' from the Criminal Records Bureau we will not do so without informing them beforehand unless the disclosure is required by law.

Once a person has taken up employment with CMSUK, we will compile a file relating to their employment. The information contained in this will be kept secure and will only be used for purposes directly relevant to that person's employment. Once their employment with CMS UK has ended, we will retain the file in accordance with the requirements of our retention schedule and then delete it.

Details of Board Directors and Committee Volunteers are supplied by the individual at the point of application/nomination. All are required to have an active CMSUK membership profile.

## 2 How CMSUK Securely Store Information

### 2.1 CMSUK Website Database

CMSUK Membership, Event Attendee, and Contacts database information is digitally stored on the CMSUK website administration system which is hosted and maintained by [www.netmatters.co.uk](http://www.netmatters.co.uk). Information is stored on a cloud based system serviced by a 3rd party. All personal information stored on servers within the European Economic Area (EEA), with the website itself having a Transport Layer Security (TLS) certificate.

### 2.2 CMSUK Microsoft online One Drive File Storage

Aspects of CMSUK Membership, Event Attendee and Contacts database information is stored on the CMSUK Microsoft One Drive and is password protected. All PCs and workstations should be closed and password protected overnight.

### 2.3 CMSUK Office Backup

An external weekly backup is taken of our One Drive and stored securely. This provides backup in the event of service failure of One Drive and stored under lock and key in the CMSUK office.

### 2.4 CMSUK Office Filing

CMSUK strive to run as paperless an office as possible. No membership profiles are held in paper form on the Office premises. However, very limited event attendee information such as name, company, job title, office email may be held in event files at the CMSUK office.

### 2.5 Crowd Compass Conference App

CMSUK utilise the services of the Crowd Compass Conference App to store delegate information of those attending CMSUK Conferences. Delegate data remains within the conference app before and beyond the event in order that Delegates have access to conference information both pre and post event.

The App is password protected and limited to attendees of the event. All attendees have access to their attendee profile to add or remove information.

## 3 How CMSUK Comply with Reasonable Request for Information it Holds

### 3.1 Membership Profiles

All CMSUK members have access to their own membership profiles via the password protected Member Area of the website and are responsible for keeping it updated.

CMSUK has a policy of non-disclosure of member personal information and will never provide list information of its members to a third party. However, CMSUK strives to encourage proof of membership and referrals so does this via the CMSUK website Member Check facility.

Website search results will show minimal details for all membership categories: Details shown are:

- Member Name
- Membership Number (including membership type)
- Company Name

Full Case Manager members of CMSUK who have agreed to be contactable via the website, will have an additional 'Contact Member' button next to their search result which will allow a 'blind' email contact opportunity where the sender cannot see the email address of who they are sending to. The member being contacted in this way then has the choice to respond or not. Only if that member chooses to respond will the person making contact see any personal information.

CMSUK occasionally receive referral requests via email or telephone for details of members with specific requirements i.e. a certain language or expertise skill. In these instances, the CMSUK administration may provide member names and then direct the enquirer to the 'Member Check' facility on the CMSUK website so that they might make direct contact with any full Case Manager members or get information as to a company they might wish to contact.

### 3.2 Access to other forms of personal Information

CMSUK tries to be as open as it can be in terms of giving people access to their personal information. Individuals can find out if we hold any personal information by making a 'subject access request' under the General Data Protection Regulation. If we do hold information about you we will:

- give you a description of it;
- tell you why we are holding it;
- tell you who it could be disclosed to; and
- let you have a copy of the information in an intelligible form.

To make a request to CMSUK for any personal information we may hold, you need to put the request in writing and either address it to us at the address provided below, or [email us](#).

If you agree, we will try to deal with your request informally, for example by providing you with the specific information you need over the telephone.

If we do hold information about you, you can ask us to correct any mistakes by, once again, contacting us.

As an individual, if you have issues accessing your personal information with any organisation you have the right to lodge a complaint with the ICO.

### **3.3 Data Subject Rights**

CMSUK working practices and policies are in place to protect the individuals they hold information on and to uphold the following:

- The right to rectification
- The right to Object
- The right to be forgotten
- The right to restrict processing
- The right of data portability

## 4 How CMSUK evidences its GDPR practices in the event of an Audit

### 4.1 CMSUK Policies

CMSUK has the following associated policies in place to ensure GDPR requirements are adhered to:

- Privacy Policy
- Retention / Deletion Policy
- Cookie Policy

### 4.2 CMSUK Policy Review

CMSUK constantly reviews its practices and will review its policies and company documents periodically. All policy documentation will record its published date concluding any review found necessary.

#### Policy Review schedule:

- Periodically when required, overseen by the CMSUK Data Protection Officer (Vice Chair of CMSUK) and recorded on an audit log.

### 4.2 Policy Training

All employees, board members and volunteer committee members will be directed and trained to follow CMSUK policies.