

Jersey Photographic Club Data Protection Policy

1. General

Jersey Photographic Club (JPC) is established with the objects set out in its Rules (separate document) and is a data controller within Jersey.

JPC will rely on Article 6(1)f of the European Union General Data Protection Regulations which come into force on 25 May 2018. By virtue of its (this) JPC Data Protection Policy, JPC will rely on the principle of Legitimate Interest for the collection and retention of data and will therefore not seek explicit consent to hold personal data as detailed in this policy.

The personal information referred to in this Policy may include name, contact details, records of entries to events, metadata contained within digital photographic image files (Images) and such other information as may be necessary for the effective management of the legitimate interests of JPC. Any person wishing to verify the information held by JPC may apply to the Secretary.

All JPC officials and members must ensure a proper understanding of this policy and their responsibility to act within its terms.

2. Data Collection

JPC collects and holds personal information about:

- 2.1. Its members (some of whom will form its organising committee), others who assist that organising committee, those offering their services to the JPC community e.g. as judges or speakers and non-members who subscribe to the JPC social media pages.

This information is used to facilitate administration and services. Some of this information is compiled into a programme of events, circulated to the members of JPC and published on the JPC website.

The contact details of JPC officials allocated to provide particular services may be published generally.

- 2.2. Others necessary for the conduct of the business of JPC.

This information is used to satisfy a requested service or a contractual requirement and may be retained to confirm the outcome.

- 2.3. Photographers as the creators of Images used in the activities of JPC.

JPC may retain historical archives, for example (but not limited to) records of meetings, programmes, catalogues, awards, members' photographic images, competition results, members' contact details and other event results.

3. Sources and Purposes of Collected and Retained Data

- 3.1. Membership Records - for each member, details of:

- 3.1.1 Names

- 3.1.2 Address

- 3.1.3 telephone number(s)

- 3.1.4 email address

- 3.1.5 date of joining

- 3.1.6 date of leaving

- 3.1.7 Photographic experience / awards / equipment preference

- 3.1.8 Attendance records

- 3.1.9 Annual subscription payment records (including, where appropriate, bank details)

This information either in whole or part is retained as either a paper record and/or a computer record. The computer-based record may be held on the home computer of a

member of the organising committee or in cloud services administered by the organising committee. In all cases, computer-based records are password controlled. From time to time this data, either in whole or part may be shared with between members of the Organising Committee.

3.2. Records for Internal Competitions and Exhibitions

For those members who enter such competitions the JPC Competition Rules make it clear the data required from members. It should be recognised that digital photographic image files are capable of carrying metadata. Such data may contain details of the camera on which the image was taken along with other camera related settings, geographic location of the image and other user supplied data added in post processing.

Members will provide images of their work in both print and digital formats. JPC will not retain physical prints on an archival basis, but may hold them on a temporary basis as follows:

3.2.1. Between the closing date for entries to a competition and the competition itself and following the competition if the member is not available to take back the prints immediately after the competition.

3.2.2. Between the closing date for entries to an Exhibition and the Exhibition itself and following the Exhibition if the member is not available to take back the prints immediately after the Exhibition.

Prints will be held on this temporary basis in the personal possession of an JPC member designated by the Organising Committee.

Prints may have appended to them the following information:

3.2.2.1 Name of the author of the image

3.2.2.2 Title of the image

3.3. Members' digital image files are retained on the Club computers and cloud-based storage (such as Dropbox) for archival purposes principally to enable:

3.3.1 Competition rule compliance

3.3.2 Ease of publishing high scoring images to the JPC website and social media

3.3.3 Selection of images to be entered in external competitions

3.4 Website, Facebook etc.

Non-sensitive personal information may be published on the JPC website and generally this will take the form of:

3.4.1 Names of committee members

3.4.2 Contact telephone number for a specific event

3.4.3 Digital images named with the mark obtained in a competition, title of image and first name and surname of the author. Some published images may not contain all this information and might include images submitted for general interest.

3.4.4 Award winning and commended images submitted for any Exhibition undertaken by JPC.

3.4.5 JPC maintains a Facebook page. JPC will normally not post personal information about members but refer to a member or members by name if or when referring to a specific event.

3.4.6 Members names and email addresses may be provided to such electronic newsletter distributors or facilitators (e.g. MailChimp) as JPC may from time to time decide to use.

4. General Protocols

4.1. Email

JPC committee members use email extensively as a means of communication to JPC members. Unless there is a compelling reason to do otherwise, all circular type emails will be sent to members using the “JPC” option so that the email address of each recipient is not revealed to the others. This is primarily to protect members generally, if one member should forward such an email outside the JPC community.

4.2. Right to be Forgotten

JPC will not automatically erase personal data of members who leave JPC

4.3. Data Separation

4.3.1 It is recognised the JPC officials (or others) may also be officials or members of other separate organisations and may also hold personal data in those capacities. Such members may therefore be Data Controllers for more than one organisation.

4.3.2 JPC expressly forbids any of its officials or members who hold personal data to share that data with another organisation and such members should also note that they are not permitted to share data the other way around.

4.4. Inter Club and similar Third Party Events

From time to time JPC participates in such events and this entails personal data (normally member name, image title and physical image (print and/or digital) being given to a third party over which JPC has no control over how data is held, retained or used.

In such circumstances JPC will ensure that its selection process of images for such events includes the need for explicit consent to be obtained from the member(s) in question.

4.5. Data Retention

General JPC records (including membership and accounting records) will normally be held for a minimum of eight years, but JPC may retain historical archives indefinitely, for example (but not limited to) records of committee meetings, handbooks, catalogues, awards, competitions and other event results.