

## The Society for Existential Analysis

## **Data Protection Policy**

Last updated: January 2025

- **1. Introduction** The Society for Existential Analysis ("the Society") is committed to protecting the privacy and personal data of its members and others with whom it interacts. This policy outlines the Society's approach to data protection in compliance with the UK General Data Protection Regulation (GDPR), the Data Protection Act 2018, and relevant UKCP policies.
- **2. Purpose** The purpose of this policy is to:
  - Ensure the Society processes personal data lawfully, fairly, and transparently.
  - Outline how the Society collects, uses, stores, and protects personal data.
  - Ensure all personal data is handled in line with GDPR and UKCP requirements.
- **3. Scope** This policy applies to all personal data processed by the Society, including data relating to members, trustees, employees, contractors, and any other individuals.

## 4. Roles and Responsibilities

- Data Controller: The Society is the Data Controller for the personal data it collects.
- **Data Protection Officer (DPO)**: The Society will appoint a DPO if required by law. In the absence of a DPO, the trustees will collectively oversee data protection compliance.
- All Staff and Volunteers: Anyone handling personal data on behalf of the Society must adhere to this policy.
- **5. Data We Collect:** The Society collects the following types of personal data:
  - Members: Names, addresses, email addresses, telephone numbers, payment details (e.g., for annual registration fees).
  - **Employees and Contractors**: Contact details, payment details, and other employment-related information.
- **6. Lawful Basis for Processing** The Society processes personal data under the following lawful bases:
  - Contractual Necessity: To manage memberships and provide services to members.
  - Legal Obligation: To comply with legal and regulatory requirements (e.g., financial records).

- **Legitimate Interests**: To pursue the legitimate interests of the Society, such as communicating with members and promoting events.
- **Consent**: For specific purposes, such as sending marketing communications, where consent is required.
- 7. Data Processing Principles The Society adheres to the GDPR's data protection principles:
  - 1. **Lawfulness, Fairness, and Transparency**: Personal data will be processed lawfully, fairly, and in a transparent manner.
  - 2. **Purpose Limitation**: Data will only be collected for specified, explicit, and legitimate purposes.
  - 3. **Data Minimisation**: Only data necessary for the purposes outlined will be collected and retained.
  - 4. **Accuracy**: Personal data will be kept accurate and up-to-date.
  - 5. **Storage Limitation**: Data will not be kept longer than necessary.
  - 6. **Integrity and Confidentiality**: Data will be processed securely to prevent unauthorised access or loss.

## 8. Data Storage and Security

- Personal data will be stored securely, whether in electronic or physical formats.
- Access to personal data will be restricted to authorised personnel.
- Appropriate technical measures, such as encryption and secure passwords, will be implemented to safeguard electronic data.
- Physical records will be stored in secure locations.
- **9. Data Sharing** The Society will only share personal data with third parties when necessary and in compliance with GDPR. Examples include:
  - Sharing financial information with payment processors.
  - Sharing information with regulatory bodies, such as the UKCP, if required.
- **10. Data Retention** The Society will retain personal data only as long as necessary for the purposes for which it was collected or to comply with legal obligations. Membership records will generally be retained for up to 6 years after the end of the membership period.
- **11. Data Subject Rights** Individuals have the following rights under GDPR:
  - **Right to Access**: To request a copy of their personal data.
  - **Right to Rectification**: To request corrections to inaccurate or incomplete data.
  - Right to Erasure: To request deletion of their data under certain circumstances.
  - **Right to Restrict Processing**: To limit the processing of their data.
  - Right to Data Portability: To receive their data in a portable format.
  - Right to Object: To object to data processing in certain circumstances.
  - **Right to Withdraw Consent**: To withdraw consent for data processing where consent is the basis for processing.

Requests to exercise these rights should be directed to the Society via email at [insert contact email].

- **12. Breach Reporting** In the event of a data breach, the Society will:
  - Take immediate steps to contain and investigate the breach.
  - Notify the Information Commissioner's Office (ICO) within 72 hours if the breach poses a risk to individuals' rights and freedoms.
  - Inform affected individuals if required by law.
- **13. Policy Review** This policy will be reviewed annually or in response to legislative or regulatory changes.
- **14. Contact Information** For questions about this policy or data protection at the Society, please contact the Chair of the Society via email at: chair@existentialanalysis.org.uk