

Union Jack Club

Data Protection Officer Policy

1. Main Purpose

To ensure compliance with the EU General Data Protection Regulation ("GDPR") and provide for ongoing compliance of all Union Jack Club's activities.

2. Position

The Data Protection Officer ("DPO") works in conjunction with the Financial Controller, Chief Executive Officer or Deputy Chief Executive Officer who report directly to Union Jack Club's Board of Trustees.

The current Data Protection Officer is Peter Vine from the firm Clear Comm who offers advice; reviews policy's and oversees the GDPR activities of the Union Jack Club.

3. Responsibilities

The DPO is an expert in data protection law and practice and shall advise on and ensure that Union Jack Club is compliant with the requirements of the GDPR, based on Union Jack Club Board of Trustees agreeing to and implementing all Policy Documents and Procedures relating to the GDPR at all times, as well as other relevant UK data protection law and regulation.

It is the responsibility of the DPO to ensure that all of Union Jack Club's policies and procedures are maintained and kept up to date and that data processing audits are regularly carried out to ensure that Union Jack Club's core activities comply with the GDPR.

The Employees of Union Jack Club shall liaise with Union Jack Club's appointed DPO on all data protection matters.

Pursuant to Article 39, 1,a-e GDPR, the main tasks of the DPO are as follows:

1. To provide information and advice to Union Jack Club, including its partners, suppliers and contractors on all matters of data protection and compliance with the GDPR and UK law;
2. To liaise with and advise all employees of Union Jack Club regarding their obligations under the GDPR and UK law in relation to personal data;

3. To monitor compliance with the GDPR and UK law by carrying out audits of processes pertaining to personal data, reporting the findings to the Board of Trustees and to allocate internal responsibilities to ensure ongoing compliance;
4. To help develop and maintain Union Jack Club's Data Protection policies, processes and procedures in relation to personal data;
5. To facilitate the delivery of training for all employees of Union Jack Club, who are involved in processing personal data;
6. To advise on data protection impact assessments and performance monitoring, as per the requirements of the GDPR;
7. To liaise with the supervisory authority and to be the main point of contact on all issues pertaining to personal data, consulting with the supervisory authority when necessary;
8. To advise on effective security procedures and monitor compliance;
9. To advise on and help develop incident reporting procedures and investigations;
10. To advise on information security processes and allocation of responsibility;
11. To assist with the development of business continuity planning;
12. To advise on the processes for monitoring the copying of proprietary software;
13. To advise on the safeguarding of organisational records; and
14. To advise on personal data that is collected by Union Jack Club, is properly controlled and safeguarded.

The DPO shall have access at all times to Union Jack Club's personal data collection, processing and storage systems. All Union Jack Club, employees are required to assist the DPO in engaging in these duties, including providing access to records and systems if requested. Failure by Union Jack Club, employees to assist the DPO accordingly, will be reported to the Board of Trustees .

4. Document owner

The DPO is the owner of this policy document and must ensure that it is periodically reviewed according to the review requirements contained herein.

The latest version of this policy document dated 1st March 2018 is available to all members and guests of Union Jack Club on the Club's website or for staff on the Club's Internet and will be included in the Club's training program undertaken by Heads of Department.

This policy document was approved by Union Jack Club's Board of Trustees and is issued by the Chief Executive Officer ("CEO") on a version controlled basis.

Name of CEO: Mr Simon Atkins

Date: 1st March 2018

Change history record

Issue	Description of Change	Approval	Date of Issue
1	n/a	n/a	n/a
2	n/a	n/a	n/a
3	n/a	n/a	n/a