



**THE WORSHIPFUL COMPANY OF TURNERS**  
and  
**THE WORSHIPFUL COMPANY OF TURNERS CHARITABLE TRUST**

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**Data Protection Policy**

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**16<sup>th</sup> February 2021**

**The Worshipful Company of Turners**

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## DATA PROTECTION POLICY

In the course of running its day to day business and promoting its charitable and educational aims, The Worshipful Company of Turners and The Worshipful Company of Turners Charitable Trust (the '**Company**'), may collect and process information about its members and staff as well as members of the public such as enquirers and correspondents. Please read the following to understand our practices regarding your personal data. The Company website [www.turnersco.com](http://www.turnersco.com) (our 'Website') contains links to and from other related websites. Please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to these websites.

### The Company may collect and process the following data:

Data held	Classification	What it's used for	Protected/managed
<b>Staff</b> personal data, employment history, education and qualifications, contact details, bank details and record of employment with the Company.	Sensitive Data (special data)	Very occasionally, the Company may process information about its employees' health or medical details. The Company processes such employee personal data for ordinary staff administration purposes, including salary payment and conferring other benefits, conducting appraisals, training and management. It also collects personal data about prospective candidates in the recruitment process.	Password protected computer and banking software. Windows firewall protection, Microsoft security essentials spyware protection, external hard drive backup stored in fire proof safe. Staff training Seminar Feb 2018
<b>Member</b> personal data of its past, present and prospective members (Liverymen, Freemen, Yeomen and Apprentices). The personal data held includes members' education and employment history, qualifications, personal and family circumstances, contact details, and may include financial details. <b>Note:</b> Also see Dining Information	Personal Data	The Company processes such personal data in order to administer membership, to organise events such as meetings and social events, and to collect payment. It also processes members' personal data for fundraising purposes including seeking endowments such as gifts, trusts and bequests. The Company holds some information about its members for archival and historical research purposes, for example, to maintain a roll of past Freemen and Liverymen, Masters and Clerks. All Liverymen, (names only) are listed in the Blue Book, and names and addresses of Liverymen will be provided to the City of London Common Hall Register for electoral reasons.	Password protected computer and banking software. Windows firewall protection, Microsoft security essentials spyware protection, external hard drive backup stored in fire proof safe. Staff training Seminar Feb 2018  We may share member data amongst the membership, but will not transfer any member data to any third parties without permission unless indicated in this privacy policy. We will never sell member or third party data for the purposes of marketing.

<p><b>Beneficiaries</b> through the Company's charitable and educational activities - Charities, schools, bursary award entrants, turning competition entrants, and applicants to any other Company supported charitable endeavour.</p>	<p>Personal Data</p>	<p>In order to further its charitable and educational aims, the Company may process personal data about beneficiaries and potential beneficiaries, which may include personal, family and financial circumstances, education, and employment history. The Company may also process personal data about its beneficiaries for historical and archiving purposes.</p>	<p>Password protected computer and banking software. Windows firewall protection, Microsoft security essentials spyware protection, external hard drive backup stored in fire proof safe. Staff training Seminar Feb 2018</p>
<p><b>The public</b></p>	<p>Personal Data</p>	<p>The Company may enter into correspondence with members of the public, such as enquirers, correspondents, competition entrants and exhibitors, visitors to turning competitions and exhibitions. When it does so, the Company may collect incidental personal data such as contact details and personal circumstances, and process such personal data in order to respond to queries and deal with relevant issues. We may ask you to complete optional surveys for research purposes.</p>	<p>Password protected computer and banking software. Windows firewall protection, Microsoft security essentials spyware protection, external hard drive backup stored in fire proof safe. Staff training Seminar Feb 2018</p>
<p><b>Suppliers</b> The Company processes personal data concerning its suppliers of goods and services, including identifiers such as contact details, financial information and purchase history.</p>	<p>Personal Data</p>	<p>The Company processes such information in order to purchase goods and services, to pay its suppliers and to maintain its accounts and records.</p>	<p>Password protected computer and banking software. Windows firewall protection, Microsoft security essentials spyware protection, external hard drive backup stored in fire proof safe. Staff training Seminar Feb 2018</p>
<p><b>Dining Information</b></p>	<p>Sensitive Data (special data)</p>	<p>When attending Company functions, we may ask you for dietary requirements which will be used for catering purposes only.</p>	<p>Password protected computer and banking software. Windows firewall protection, Microsoft security essentials spyware protection, external hard drive backup stored in fire proof safe. Staff training Seminar Feb 2018</p> <p>If members have provided dietary requirements, we will hold these securely within our membership database, and only share with caterers aware of their GDPR obligations when necessary. If you are a guest, have attended a Company function and have provided dietary requirements, we will pass these onto caterers only for the purpose of that function. These dietary requirements will not be stored.</p>

<b>Images</b>	Personal Data	The Company may use images either captured at Company events or provided via email or in the public domain (unless copyrighted), for use on the Website, Company leaflets or Company records or for Livery related promotional purposes.	Images are stored on a password protected computer and banking software. Windows firewall protection, Microsoft security essentials spyware protection, external hard drive backup stored in fire proof safe. However, these images may be used in the public domain (website, leaflets, Livery promotion) Staff training Seminar Feb 2018
<b>Register of Professional Turners</b> personal data of its past, present and prospective members. The personal data held includes members' contact details, and may include financial details. <b>Note:</b> Also see Dining Information	Personal Data	The Company processes such personal data in order to administer membership, to organise events such as meetings, social events, exhibitions and competitions, and to collect payment. It also processes members' personal data for fundraising purposes including donations of woodturning.	Password protected computer and banking software. Windows firewall protection, Microsoft security essentials spyware protection, external hard drive backup stored in fire proof safe. Staff training Seminar Feb 2018

## Applicable data protection law:

Data protection law in England and Wales is primarily found in the Data Protection Act 1998 ('**DPA**'). With effect from 25<sup>th</sup> May 2018, the DPA will be repealed and superseded by the General Data Protection Regulation ('**GDPR**'). The GDPR will be supplemented by the Data Protection Act 2017. In this policy, any reference to the Data Protection Legislation means the DPA, or the GDPR, as supplemented by the Data Protection Act 2017 ('**DPA 17**'), whichever is in force at the time.

The DPA is enforced in England by the Information Commissioner, operating through the Information Commissioner's Office (the '**ICO**'). The ICO publishes guidance on the DPA and has a broad range of powers, including the ability to issue fines of up to £500,000 for breaches. The ICO will enforce the GDPR when it takes effect in May 2018. Under the GDPR, the ICO will have greater powers, including the ability to issue fines of up to 4% of annual turnover, or €20,000,000, (whichever is greater) and to conduct compulsory audits of organisations' data handling practices.

### Key concepts of applicable data protection law

The Data Protection Legislation relies on a number of key definitions, which are explained below.

'**personal data**' means any information relating to an identified or identifiable natural person (a 'data subject', which is explained in more detail below). An identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier, or to one or more factors specific to the identity of that natural person.

The Company will hold personal data about its past, present and prospective members (including Liverymen and Freemen), members of the Register of Professional Turners, staff and members of the public such as beneficiaries,

as well as its suppliers. The Company may hold such personal data both in electronic and hard copy format, in records, correspondence and minutes.

**‘processing’** means any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaption or alteration, retrieval consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction. Processing is interpreted very broadly, so that almost all activities organisations carry out in relation to their personal data are captured by the definition.

The Company will generally be deemed to be processing any personal data that it may collect, record, store and/or disclose.

**‘controller’** means the natural or legal person, public authority, agency or other body, which determines the purposes and means of the processing of personal data. The Data Protection Legislation applies to controllers, who must comply with its requirements.

The Company will generally be a controller in relation to the personal data of its members, staff, members of the public such as beneficiaries and enquirers, and suppliers.

**‘processor’** means a natural or legal person, public authority, agency or other body which processes personal data on behalf of the controller. Where a controller uses a processor to process personal data on its behalf, the controller must only use a processor that provides sufficient guarantees to ensure that personal data is processed securely, and in accordance with the requirements of the GDPR. Controllers must engage processors by way of a contract incorporating the provisions specified by Article 28 of the GDPR.

The Company may use processors for a variety of purposes; for instance, to store personal data, to send email communications, or to calculate staff payroll. In each case, it will conduct sufficient due diligence to be able to evaluate whether the processor offers sufficient guarantees to protect personal data and will ensure that the processor is bound by a contract that incorporates the provisions specified by the GDPR. The requirements around appointing processors are explained in more detail below.

**‘special categories of personal data’** means personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, genetic or biometric data, data concerning health (including medical data, and medical records, for example), or concerning an individual’s sex life or sexual orientation. Special categories of personal data is the term used in the GDPR which, broadly speaking, replaces the concept of ‘sensitive personal data’ from the DPA.

The special categories of personal data require a higher standard of care. If a personal data breach (as defined below) occurs that involves the loss of any of the special categories of personal data, the ICO will regard this as a serious breach. The GDPR also requires that personal data relating to criminal convictions and offences is treated with a higher standard of care.

The Company is generally unlikely to hold a significant volume of the special categories of personal data, though in the event that it does, it will ensure the information is handled accordingly.

**‘data subject’** means an individual to whom personal data relate. Typically, these are employees, customers, and suppliers.

The categories of data subject whose personal data the Company is likely to process will include members, staff, suppliers and members of the public.

**'personal data breach'** means a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data.

A personal data breach may be accidental, such as a system failure, or loss of an electronic or physical file, or malicious, such as a cyberattack. In the event that the Company suffers a personal data breach, it will take specific steps, explained below in this policy.

## The data protection principles:

The data protection principles are standards which the Company must observe when processing personal data. These principles are as follows:

**Fairness:** Organisations generally cannot process individuals' personal data in a way that an individual would not have reasonably expected. Collecting personal data on the pretext of one purpose and then using it for another, unrelated purpose is unlikely to be fair. The Company will consider whether its uses of personal data would fall within the reasonable expectations of the affected data subjects.

**Transparency:** Organisations must provide certain prescribed information to individuals when processing their personal data, including the organisation's identity, the purposes for which personal data are being processed, or are to be processed, and any third party recipients of the personal data. A complete list of the information that must be provided to data subjects can be found in Articles 13 and 14 of the GDPR. The transparency information must accurately reflect the controller's use of personal data. This is frequently provided by way of a website privacy notice, but may also be provided by way of a disclaimer on a paper form, or a pre-recorded message in the context of recorded telephone calls.

The Company will ensure that its website privacy notice, and any other means by which it makes the transparency information available to data subjects (such as a disclaimer on a paper form) accurately and comprehensively reflect its processing activities.

**Lawfulness:** Organisations must establish at least one of a number of lawful grounds for processing. These lawful grounds are set out in Article 6 of the GDPR and are as follows:

- 1) The data subject has given his or her **consent** to the processing. Note that to be valid, consent must be freely-given, informed (by way of the transparency notice, explained above) specific, and capable of withdrawal at any time, without detriment to the data subject. Consent must be indicated by way of an unambiguous, positive affirmation by the data subject. Consent cannot be inferred from the absence of an objection, and will not be valid where the data subject does not have a genuine choice.
- 2) Processing is necessary for the **performance of a contract** to which the data subject is a party, or in order to take steps at the request of the data subject prior to entering into a contract.
- 3) Processing is necessary for **compliance with a legal obligation** to which the controller is subject.
- 4) Processing is necessary in order to protect the **vital interests of the data subject** or of another person.
- 5) Processing is necessary for the performance of a task carried out in the **public interest** or in the exercise of official authority vested in the controller.

6) Processing is necessary for the purposes of **legitimate interests** pursued by the controller or by a third party except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require the protection of personal data.

### **Purpose limitation**

This principle requires that the purposes for which personal data are processed are limited to those purposes specified in the transparency information that has been provided to the affected data subjects, and not processed for any further, incompatible purposes. Any further processing operations for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes are not considered to be incompatible purposes.

The Company will only process personal data it holds for those purposes specified in the website privacy notice, or other such transparency notice.

### **Data minimisation**

Personal data should be adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed.

The Company will only collect the personal data that is strictly necessary for the purpose for which it was collected, and will not collect additional, unnecessary personal data on a 'just in case' basis.

### **Accuracy**

Personal data must be kept accurate, and up to date.

The Company will ensure that any requests from data subjects to update their personal data are dealt with promptly, having satisfied itself as to the requester's identity.

### **Storage limitation**

Personal data must not be kept for longer than is necessary for the purposes for which the data is processed. The duration for which personal data is stored will be dictated by applicable legal, business or other reasons, such as retention periods driven by tax legislation.

Note that the Company may store some categories of personal data for longer periods where such processing is solely for archiving purposes in the public interest, or historical research purposes. In such cases, the Company will implement appropriate safeguards, such as allowing data subjects to request deletion of some of their personal data.

If the Company cannot establish a valid legal, business or other reason for retaining personal data, it will be securely deleted. The Company will specify the periods for which personal data is stored in a record retention policy. After the storage period has expired, personal data should be deleted.

### **Integrity and confidentiality**

Personal data must be processed in a manner that ensures its security, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures.

The Company will take appropriate measures that are proportionate to the risk associated with the personal data it holds. Such measures may be technical, such as encryption and password protection of electronic devices and electronic storage media (e.g. USB drives), or organisational, for example, by operating a layered access policy, appropriate vetting of staff who have access to personal data, conducting appropriate due diligence on any third parties that process personal data on the Company's behalf, and binding them by an appropriate engagement contract. The Company will consider regularly reviewing and testing its security measures.

### **Accountability**

Controllers are responsible for compliance with the principles explained above, and must be able to demonstrate compliance.

The Company is able to provide evidence of compliance, for example, by way of a data protection policy, documented data protection reviews and a record of data protection training.

### **Data Breach:**

If a data security breach occurs, the Company (as Controller) will notify the breach to the ICO '*without undue delay and, where feasible, within 72 hrs of the personal data breach occurring.*' However, this notification requirement does not apply where the breach '*is unlikely to result in a risk to the rights and freedoms*' of the individuals concerned.

This notification will include the information specified in Article 33(3) of the GDPR, and where it is not possible to provide all the information at once, it may be provided in phases.

#### **Reporting breaches to individuals:**

Where a data security breach occurs, and it is likely to result in a 'high risk' to the rights and freedoms of the individuals concerned, the Company must notify the affected individuals 'without undue delay'. Article 34(2) of the GDPR specifies what information must be provided. However, the Company is not required to notify data subjects if:

- 1) The personal data concerned had been rendered unintelligible (for example, by way of encryption)' or
- 2) Subsequent measures have been taken by the Company so that there is no longer a high risk to the individuals;  
or
- 3) It would involve disproportionate effect to communicate to each affected data subject individually, although where this applies then a general public communication will be made.

The Company will maintain a schedule of data breaches (whether or not notification was made at the time), to comply with Article 33(5) of the GDPR.

#### **Data protection impact assessments (DPIAs)**

A DPIA consists of a documented consideration and evaluation of the data protection risks arising from a proposed new processing activity, along with recommended mitigation strategies to address the risks.

Under Article 35 of the GDPR, the Company is required to undertake a DPIA "*where a type of processing in particular using new technologies, and taking into account the nature, scope, context and purposes of the processing, is likely to result in a high risk to the rights and freedoms of natural persons*"

The Company does not believe that the nature of its processing is such that there is likely to be a high risk to the rights and freedoms of the data subjects whose personal data it holds. As a result, the Company does not believe that it is necessary for it to undertake any DPIAs.



The Company will keep this conclusion under review, including any guidance issued from ICO, or practice in other similar schemes

### **Third party processors:**

The Company will ensure that it has a written contract which meets the requirements of GDPR in place with each processor it uses. The Company will only use processors that guarantee they will meet the requirements of the GDPR and will protect data subjects' rights.

Before engaging a processor, the Company will check that the processor has appropriate technical and organisational measures in place to keep data secure; and that the processor's staff who will be engaged in processing personal data on behalf of the Company are subject to a duty of confidentiality and receive regular training in data protection matters.

The Company will regularly review the activities and processes of any processors it uses, to check that the processor is processing personal data in line with its internal processes; complying with relevant requirements under the Data Protection Legislation and its contractual commitments in respect of the personal data. The Company will ensure that its contract with each processor contains provisions concerning sub-contracting which meet the requirements of GDPR.

### **Data subjects' rights':**

Data subjects are entitled to access their personal data held by the Company on request (Article 15 GDPR). The response to a data subject access request will include certain information, such as: the purposes of the processing; the recipients (or categories of recipient) to whom the personal data have or will be disclosed; and individuals' rights to have their data corrected, deleted or to restrict the processing of their data.

Under the GDPR, the information will be provided to data subjects free of charge and within one month of the request.

#### **The right to be forgotten**

Data subjects have the right to request the Company erase all data held in respect of them in various circumstances (Article 17 GDPR). However, the right to be forgotten is not an absolute right, and the Company is only obliged to give effect to a request in a number of specific situations, the most relevant of which are likely to be:

- 1) Where the purpose for which the personal data was processed no longer applies; or
- 2) Where the Company's processing of the personal data is based on consent and the data subject withdraws his or her consent.

#### **The right to rectification**

Data subjects have the right to have incorrect personal data about them corrected without undue delay (Article 16 GDPR).

The Company will endeavour to ensure that any personal data it processes is up to date and correct. Where an error or inaccuracy is discovered, the Company will correct this as soon as possible.

**The right to data portability**

Data subjects have the right, in certain circumstances, to access their data in machine-readable format and, where technically possible, to have their data transferred directly from the Company to another data controller (Article 20 GDPR). However, the circumstances in which the right to data portability arises are limited and, at present, seem unlikely to be relevant to the Company.

**The right to object**

Data subjects have the right in a number of specific circumstances, to object to having their personal data processed (Article 21 GDPR).

The Company will review this policy annually and may amend it from time to time as it sees fit.

For further information about this policy, and the Company's data handling practices, please contact:

Mr Alex Robertson, The Clerk

020 7236 3605

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