



Society for the History of Astronomy

DATA PROTECTION & THE SOCIETY FOR THE HISTORY OF ASTRONOMY

POLICY

The *Society for the History of Astronomy* ("the SHA" or "the Society") will take all measures necessary to abide by Data Protection legislation.

BACKGROUND

The EU General Data Protection Regulation ("the Regulation", or "GDPR") – effective in the UK from 25 May 2018 - establishes a framework of rights and duties which are designed to safeguard personal data. This framework balances the legitimate needs of organisations to collect and use personal data for business and other purposes against the right of individuals to respect for the privacy of their personal details.

The SHA, as a voluntary, non-profit making organisation, with quite limited data processing needs, is exempt from the need to appoint a Data Protection Officer. It is required, nevertheless, to abide by the six straightforward, common-sense principles, which underpin the Regulation. These are that personal data shall be:

- a) processed lawfully, fairly and in a transparent manner in relation to individuals;
- b) collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes; further processing for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes shall not be considered to be incompatible with the initial purposes;
- c) adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed;
- d) accurate and, where necessary, kept up to date; every reasonable step must be taken to ensure that personal data that are inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay;
- e) kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed; personal data may be stored for longer periods insofar as the personal data will be processed solely for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes subject to implementation of the appropriate technical and organisational measures required by the GDPR in order to safeguard the rights and freedoms of individuals; and
- f) processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures.

THE SOCIETY'S USE OF PERSONAL DATA

The SHA will collect the following membership data - usually at the time of membership application: name and contact details (address(es), telephone number(s) and email address(es)) and status in relation to prevailing concessionary subscription rates. It may also (at the member's discretion) collect a summary of *astronomical history* topics in which the member has special interest or expertise. This 'personal data', together with dates pertaining to membership, will be stored and processed by the Society for the following purposes:

- (a) administration of the SHA - including membership subscription accounting, discount assessment, renewal notices, and publication and circular distribution; The lawful basis for processing this data will normally be '*Contract*', as it is necessary in order to enable the SHA to provide the services to members that it undertakes to provide in consideration of the annual membership subscription.
- (b) historical, statistical or research purposes, after anonymising the data to avoid identification of individuals.

The SHA will not store sensitive personal data within the meaning of the Regulation (e.g. religion, sexual orientation, ethnic origin, etc).

SECURITY OF PERSONAL DATA

The SHA will ensure that personal data is kept safe and secure, and will use strong password control to prevent unauthorised access.

DATA BREACHES

Data breaches must be reported to the Information Commissioner's Office (ICO) immediately. The breach must be investigated by the SHA, which must report its findings to the ICO and the members affected within 28 days.

TRANSFER OF DATA

The SHA will not give, sell or in any way transmit membership data to third parties - individuals or organisations - without the specific written permission of the 'data subject' (i.e. the person to whom the data refers), except insofar as we have a legal obligation to do so. An exception to this will be where the SHA needs to temporarily provide a membership address list to the organisation which mails out the *The Antiquarian Astronomer* or the *Bulletin*. We will ensure that this will be done only where such an organisation has equivalent data protection policies in place and destroys the personal data after any given mailing.

DATA SUBJECTS' RIGHT OF ACCESS

Any individual whose personal data is held on a register, database or other storage system by the SHA shall have the right to see that data (within 28 days) upon written request to the SHA General Secretary. Furthermore, any corrections of inaccurate data requested in writing by that individual shall be implemented within 28 days of the request.



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DESTRUCTION AND RETENTION OF PERSONAL DATA

When a person ceases to be a member of the SHA and ceases to possess SHA assets (e.g. library books or funds), their telephone and email details will be deleted from Society records. Names, addresses, membership dates and specialist areas of interest, will be kept indefinitely for historical, statistical and research purposes. In the event of the ex-member making a written request to do so, however, this data too will be deleted.

Any existing member may give advance written notice that they wish all personal data (including name & address) to be deleted in the event that they cease to be a member. Such wishes will be recorded and acted upon in such an event.

COMMUNICATION

If any member has concerns regarding data protection issues in relation to the SHA, they should make these known to the SHA General Secretary as soon as possible.

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