

REA HQ PRIVACY NOTICE

Background

1. **Identity of the Data Controller.** Royal Engineers Association HQ (REA HQ) takes active decisions in the processing of personal data and is bound by MOD/Army Policy and Data Protection Legislation (DPA 98). In processing personal data, REA HQ is acting on behalf of Council (trustees); Council is the Data Controller. REA HQ has put policy and processes in place to ensure processing is conducted appropriately, safely and by trained administrators in accordance with the 8 Data Protection Principles which are as follows:

- a. Personal data shall be processed Fairly and Lawfully for the performance of a contract to which the data subject is a party.
- b. Personal data shall be obtained only for one or more specified and lawful purposes, and shall not be further processed in any manner incompatible with that purpose or those purposes.
- c. Personal data shall be adequate, relevant and not excessive in relation to the purpose or purposes for which they are processed.
- d. Personal data shall be accurate and, where necessary, kept up to date.
- e. Personal data processed for any purpose or purposes shall not be kept for longer than is necessary for that purpose or those purposes.
- f. Personal data shall be processed in accordance with the rights of data subjects under this act.
- g. Appropriate technical and organisational measures shall be taken against unauthorised or unlawful processing of personal data and against accidental loss or destruction of, or damage to, personal data.
- h. Personal data shall not be transferred to a country or territory outside the European Economic Area unless that country or territory ensures an adequate level of protection for the rights and freedoms of data subjects in relation to the processing of personal data.

2. **Data purpose.** The purpose for which the data are intended to be processed can be found below:

- a. Purpose(s): To maintain contact details of REA members and potential members. To provide a means of confirming REA membership eligibility. To provide a record of membership fees paid and Branches to which subscribed. To support Verification of Service (VOS) for benevolence requests. To process and maintain records of all Benevolence assistance provided by the REA. To maintain a contact list of known widows of the Corps.
- b. Description of the processes involved in the project: Data is obtained from function specific Forms submitted by data subjects or by a third party acting on behalf of data subjects. Data input is carried out by REA employees.
- c. Methods of processing personal, protected, sensitive data: Data is either manually input into the relevant database or down loaded from an online source that notifies the REA of Benevolence applications. Once the data has been processed and an electronic record obtained, the hard copy of new benevolence case are archived in secure cabinets for 2 years and then destroyed by shredding. Old benevolence cases generated before the digital system are retained for 10 years then destroyed by shredding. Membership application forms are destroyed by shredding immediately after processing.

- d. Who is involved in the project? The Controller is the PIAO. The systems are used by five civilian staff users, one of which is the administrator of the systems
- e. The REA does not have a MOU or Data Sharing Agreement with stakeholders external to MOD.

3. **Handling and processing of personal data.** The brief descriptions of the procedures on handling of personal data are listed below.

- a. REA HQ will collect personal data that is necessary to deliver the service specified within this project/application only.
- b. REA HQ will not disclose personal data to external organisations without consent from the data subject unless there is a legitimate/lawful requirement to do so.
- c. REA HQ may be bound to disclose personal data to Governmental/Judicial departments or agencies/regulators but will do so provided the processing is conducted lawfully and meets the standard required of the 8 Data Protection Principles.
- d. REA HQ aims to keep its members and clients personal data up-to-date and may be required to communicate with them to achieve that.
- e. REA HQ maintains strict security procedures and protocols including training and access to information which are designed to prevent unauthorised disclosure or unlawful obtaining of personal data.
- f. External to MOD stakeholders such as 3rd Party Suppliers, Other Government Departments, Delivery Partners and Data Processors are bound by appropriate policy including Contracts containing DEFCON 532A/B, Data Sharing Agreements and/or Memorandum of Understanding in the processing and security of personal data. This project will ensure the appropriate contract/agreement is in place between MOD and the external stakeholder to ensure adequate security of personal data provided to them for the above specified purpose.

4. **Data Subjects.** Data subjects are to be familiar with their rights iaw DPA 98:

- a. Section 7/8 (Right of access to Personal Data)
- b. Section 10 (Right to prevent processing likely to cause damage or distress)
- c. Section 11 (Right to prevent processing for purposes of direct marketing)
- d. Section 12 (Rights in relation to automated decision taking)?
- e. DPA 98 can be found at the below link; data subjects are encouraged to review and become familiar with their rights or ask the local Data Protection Officer for guidance if necessary. Website: <http://www.legislation.gov.uk/ukpga/1998/29/contents>

5. **Key governance holders.** Key governance role holders for REA HQ are listed below.

- a. Col D L D Bigger ADC – Personal Information Risk Owner (PIRO)
- b. Maj A A Gooch RE- Personal Information Risk Manager (PIRM)
- c. WO2 D Shrestha – Data Protection Officer (DPO)
- d. Lt Col (Retd) N A Jordan - Personal Information Asset Owner (PIAO)

Original Signed

N A Jordan
Lt Col (Retd)
Acting Controller REA
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