

## **Data Protection Policy**

### **1 INTRODUCTION**

- 1.1 MODEM claims exemption from notifying the Information Commissioner under The Data Protection Act 1998 (DPA 98).
- 1.2 Nevertheless, the personal data MODEM holds on members (including its officers) will be processed in accordance with DPA 98's eight principles, ie:
  - Fairly and lawfully processed;
  - Processed for limited purposes;
  - Adequate, relevant and not excessive;
  - Accurate and up to date;
  - Not kept for longer than is necessary;
  - Processed in line with members' rights;
  - Secure; and
  - Not transferred to other countries without adequate protection.

### **2 PROCESSING PERSONAL DATA**

- 2.1 The personal data held on members will be as provided by them, or as obtained from such public sources as may from time to time enable MODEM officers to contact members for MODEM business. Such sources include the web sites of members or their organizations.
- 2.2 Personal data will only be used for MODEM business. This includes membership subscription management and notification of MODEM business, meetings and conferences, and MODEM product launches and offers. Data will not be passed to other organizations except as required by law.
- 2.3 The data recorded may include title, name and personal and business contact details, qualifications and professional positions held, and payment methods.
- 2.4 MODEM officers will endeavour to keep all information accurate and up to date. From time to time, MODEM officers may contact members to verify the data held. Members will be able to request printed copies of their own personal data with reasonable notice.
- 2.5 Personal data will be held for the period of membership and for a reasonable time afterwards in case of subscription queries. Data will only be held longer, for example for direct mailing purposes, with the express permission of data subjects.
- 2.6 Data will only be processed so as not to interfere with member rights including those relating to privacy and equal opportunities.
- 2.7 Personal data will be processed only by relevant officers of MODEM. It will be held in protected files, with hardcopy marked and handled accordingly.
- 2.8 MODEM will not transfer personal data outside of the UK, except when required for contacting overseas members.

### **3 ACCESS TO INFORMATION**

- 3.1 MODEM members and former members (data subjects) can obtain a copy of all information held by submitting a written request to the Membership Secretary. There may be a handling charge of £5, payable to MODEM, for providing a copy of the data held. MODEM will correct data as requested within 3 weeks.
- 3.2 A copy of this Policy will be made available to data subjects via MODEM's website.

### **4 APPROVAL AND REVIEW**

- 4.1 This Policy was approved by MODEM's Leadership Committee at its meeting on 27 April 2010.
- 4.2 This Policy will be reviewed annually by MODEM's Leadership Committee.