

Polden Post/Village News Group – GDPR Policy

Information Held

Subscribers List	Name, Address, Tel No, email, start/end of subscription.	Held by Subscriptions Manager Updated from forms received from subscribers
Contacts list	Name, address, Tel No, email. Includes distributors, village hall contacts, etc.	Held by Secretary and/or within Polden Post Yahoo mail. Updated from information received.
Advertisers List	Name, address, Tel No, email. These are business contacts, and not regarded as personal data.	Held by advertising manager.

Communicating Privacy Information

Ensure our 'identity' is clear on the subs form, including where this privacy policy may be accessed. Subs form should also state:

- The subscriber agrees to our holding their data for the duration of their subscription
- We will use their information only for delivering the Polden Post
- Their data will only be retained up to 6 months after subscription ceases

Individuals' Rights

We will delete individuals' data on request, within 30 days.

Subject Access Requests

We will disclose/confirm data we hold on any individual, at that individual's request, within 30 days.

Lawful Basis for processing personal data

Data is held only for the purpose of delivering the Polden Post magazine.

We will not pass these details to any third party. We will not use the information to send any other material to our subscribers.

Consent

Submitting a subscription form is deemed as consent to hold the data for the purposes stated on said form, in line with the statements to be included on the form as above.

Children

We should add to our subs form that subscribers must be over 16, [although we will not ask for date of birth or age].

Data Breaches

We do not believe the data we hold would require notification to the ICO in the event of a data breach.

Data Protection Impact Assessments

Not required, as the data processed does not result in a high risk to individuals.

Data Protection Officers

Not required, as we do not meet the requirements for a DPO to be appointed.

International

Not applicable, as we do not carry out cross-border processing.