



**LDWA**

**LONG DISTANCE**

**WALKERS ASSOCIATION**

# Data Protection and Privacy Policy

Contacts	Role	Email
Stuart Bain	Data Protection Officer	<a href="mailto:datamanager@ldwa.org.uk">datamanager@ldwa.org.uk</a>

Version	Author	Notes
V1 (May 2018)	Christopher Hedley	
V2 (Jan 2020)	Stuart Bain	Policy Review
V2.1 (Nov 2020)	Stuart Bain	Updated to reflect LDWA Policy
V3.0	Stuart Bain	Approved by NEC 23/01/2021
V3.1 (Dec 2022)	Stuart Bain	Policy Review
V4.0 (Feb 2023)	Stuart Bain	Approved by NEC 28/01/2023

## Purpose

The Long Distance Walkers Association is an association of people with the common interest of walking long distances in rural, urban, mountainous or moorland areas. The LDWA allows like-minded long distance walkers to gain access to information on walking events and long distance routes across the UK. The LDWA comprises of a network of local groups across the UK who arrange social and challenge walk events. The LDWA is recognised as a national governing body (NGB) for rambling by Sport England, Sport Scotland and Sport Wales.

The National Executive Committee (NEC) is the governing body of the Long Distance Walking Association.

This policy sets out standards for ensuring the LDWA meets its obligations under all relevant data protection laws and regulations, including but not limited to, the Data Protection Act 2018 which sits alongside and supplements the UK General Data Protection Regulation (UK GDPR)

This policy also sets out the LDWA's commitment to ensuring that any personal data, including special category personal data, which the LDWA processes, is carried out in compliance with data protection law. The LDWA respects the privacy of individuals "*Data Subjects*", who are our members, website users, participants of its events and activities, and all others who may give it personal information.

A Data Protection User Guide has been developed to further refine the requirements that must be adhered to under this policy. The User Guide can be located within the LDWA Toolkit within the Data Protection section.

## Policy Statement

The LDWA is committed to ensuring that all the personal data that it processes is done in accordance with data protection law. The LDWA ensures that good data protection practice is embedded across the association.

## Data Protection Principles

The LDWA complies with the data protection principles set out below. When processing personal data, it ensures that:

- It is processed lawfully, fairly and in a transparent manner in relation to the data subject ('lawfulness, fairness and transparency').
- It is collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes ('purpose limitation').

- It is all adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed ('data minimisation').
- It is all accurate and, where necessary, kept up to date and that reasonable steps will be taken to ensure that personal data that is inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay ('data accuracy').
- It is 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 ('storage limitation').
- It is 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 ('integrity and confidentiality').

## Data Subject Rights

The LDWA has processes in place to ensure that it can facilitate any request made by a Data Subject to exercise their rights under data protection law. All volunteers must ensure they are familiar with this policy and can identify such a request and know to send it to the Data Protection Officer.

All requests will be considered without undue delay and within one month of receipt as far as possible.

**Subject access:** the right to request information about how personal data is being processed, including whether personal data is being processed and the right to be allowed access to that data and to be provided with a copy of that data along with the right to obtain the following information:

- the purpose of the processing;
- the categories of personal data;
- the recipients to whom data has been disclosed or which will be disclosed;
- the retention period;
- the right to lodge a complaint with the Information Commissioner's Office;
- the source of the information if not collected direct from the Data Subject; and
- the existence of any automated decision making.

**Rectification:** the right to allow the Data Subject to rectify inaccurate personal data concerning them.

**Erasure:** the right to have data erased and to have confirmation of erasure, but only where:

- the data is no longer necessary in relation to the purpose for which it was collected, or where consent is withdrawn;
- where there is no legal basis for the processing; or
- there is a legal obligation to delete data.

**Restriction of processing:** the right to ask for certain processing to be restricted in the following circumstances:

- if the accuracy of the personal data is being contested;
- if our processing is unlawful but the Data Subject does not want it erased;
- if the data is no longer needed for the purpose of the processing but it is required by the Data Subject for the establishment, exercise or defence of legal claims; or
- if the Data Subject has objected to the processing, pending verification of that objection.

**Data portability:** the right to receive a copy of personal data which has been provided by the Data Subject and which is processed by automated means in a format which will allow the individual to transfer the data to another data controller. This would only apply if the LDWA was processing the data using consent or on the basis of a contract.

**Object to processing:** the right to object to the processing of personal data relying on the legitimate interests processing condition unless the LDWA can demonstrate compelling legitimate grounds for the processing which override the interests of the data subject or for the establishment, exercise or defence of legal claims.

## Responsibility for the processing of personal data

The Directors of the LDWA take ultimate responsibility for Data Protection and Privacy.

If you have a complaint or wish to exercise any of your rights under Data Protection and Privacy legislation, then you can contact the Data Protection Officer in the following ways:

Name: Bill Milbourne

Email: [datamanager@LDWA.org.uk](mailto:datamanager@LDWA.org.uk)

## Monitoring and review

This policy was last updated on 28 January 2023 and is regularly monitored and reviewed..