



**Leicestershire Archaeological and Historical Society.
General Data Protection Regulation Policy. Updated September 2026.**

1. Introduction

1.1. The Leicestershire Archaeological and Historical Society (hereafter LAHS) needs to collect and use certain types of information from individuals and institutions in order to carry out its work. This work pertains predominantly to the collection of membership details and subscriptions, dissemination of news and information about LAHS activities, and distribution of publications to its members.

1.2. Personal information must be collected and dealt with appropriately whether collected on paper, stored in a computer database, or recorded on other material and there are safeguards to ensure this under the General Data Protection Regulation 2018 (GDPR), to which this policy adheres.

1.3. The parties about whom LAHS may hold and process personal data (the Data Subject) include:

1.3.1. Individual members of LAHS.

1.3.2. Organisations or institutional members of LAHS.

1.3.3. Individuals who may wish to offer a financial donation towards the work of LAHS.

1.3.4. Organisations or their representatives who may wish to offer a financial donation towards the work of LAHS.

1.3.5. Authors, contributors and subscribers to LAHS's online and print publications.

1.3.6. Any other organisation or individual who contacts LAHS

2. Data Controller

2.1. LAHS is the identified Data Controller under the GDPR, which means that LAHS determines the purposes for which personal information is held and used. LAHS is therefore also responsible for ensuring that this data is controlled in full compliance with the GDPR.

3. Disclosure

3.1. LAHS regards the lawful and correct treatment of personal information to be of the utmost importance, to maintain the confidence of those with whom LAHS deals.

3.2. The Data Subject will be made aware in all circumstances of how and with whom their information will be used and shared. LAHS will never share personal data with other organisations, (such as businesses, local authorities, funding bodies or voluntary agencies), unless at least one of the following circumstances apply:

3.2.1. The Data Subject has given explicit, verifiable consent.

3.2.2. The sharing of data is seen to be in the legitimate interest of the Data Subject.

3.2.3. The law mandates the disclosure of personal data.

3.3. There are circumstances where the law mandates that LAHS disclose data (including sensitive data), without the Data Subject's consent. These include:

- a) Carrying out a legal duty or as authorised by the Secretary of State.
- b) Protecting vital interests of an Individual/Service User or other person.
- c) The Individual/Service User has already made the information public.
- d) Conducting any legal proceedings, obtaining legal advice or defending any legal rights.

3.4. Personal data will never be sold to a third-party.

3.5. LAHS will adhere to the Principles of Data Protection, as detailed in the EU General Data Protection Regulation. Specifically, these Principles require that:

- a) Personal data shall be processed lawfully, fairly and in a transparent manner in relation to the Data Subject.
- b) Personal data shall be collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes.
- c) Personal data shall be adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed.
- d) Personal data shall be accurate and, where necessary, kept up to date.
- e) Personal data shall be kept in a form which permits identification of Data Subjects for no longer than is necessary for the purposes for which the personal data is processed.
- f) Personal data shall be 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.
- g) The controller shall be responsible for and be able to demonstrate compliance with the GDPR.

3.6. LAHS will, through appropriate management and strict application of criteria and controls:

3.6.1. Observe fully, conditions regarding the fair collection and use of information.

3.6.2. Meet its legal obligations to specify the legitimate purposes for which information is used.

3.6.3. Collect and process appropriate information, and only to the extent that it is needed to fulfil its operational needs or to comply with any legal requirements.

3.6.4. Ensure the quality of information used.

3.6.5. Ensure that the rights, (as defined by the Information Commissioners Office), of people about whom information is held, can be fully exercised under the GDPR. These include:

- a) The right to be informed.
- b) The right of access.
- c) The right to rectification.
- d) The right to erasure.
- e) The right to restrict processing.
- f) The right to data portability.
- g) The right to object.
- h) Rights in relation to automated decision making and profiling.

3.6.6. Take appropriate technical and organisational security measures to safeguard personal

information.

3.6.7. Ensure that personal information is not transferred to a third-party without suitable consent or legal obligation e.g. consent is assumed for distribution of print and digital newsletters and publications.

3.6.8. Treat people justly and fairly whatever their age, religion, disability, gender, sexual orientation or ethnicity when dealing with requests for information.

3.6.9. Set out clear procedures for responding to requests for information, erasure of information and cessation of processing.

4. Data Collection

4.1. LAHS will ensure that data is collected within the boundaries defined in this policy. This applies to data that is collected in person, over the telephone or by completing a form on the website (www.lahs.org.uk).

4.2. When collecting data, LAHS will ensure that the Data Subject:

- a) clearly understands why the information is needed;
- b) understands what it will be used for and what the consequences are should the Data Subject decide not to give consent to processing;
- c) is, as far as reasonably practicable, competent enough to give consent and has given so freely without any duress; and
- d) has received sufficient information on why their data is needed and how it will be used.

4.3. The two key parameters through which personal data will be held and processed are Consent, and Legitimate Interest.

4.3.1. Consent is defined:

- a) As offering individuals real choice and control.
- b) Genuine consent puts individuals in charge, building customer trust and engagement.
- c) Consent requires a verifiable positive opt-in.

4.3.2. Where consent is not required or realistically available, the legitimate interest of the Data Subject can be used as a lawful basis for data processing.

4.3.3. To determine legitimate interest, LAHS makes sure to:

- a) identify a justifiable legitimate interest of the Data Subject;
- b) show that the processing is necessary to achieve it; and
- c) balance it against the individual's interests, rights and freedoms.

4.4. The Information Commissioner's Office clarifies that legitimate interest is comprised of three key elements:

4.4.1. A Legitimate Interest:

- a) LAHS will clarify the legal ground for data processing through identification of a legitimate interest (e.g. sending newsletters and emails to members).

4.4.2. A Necessity Test:

- a) LAHS will assess whether legitimate interest is the correct legal ground and whether the processing of personal data is necessary. (e.g. The processing of personal data is necessary for distribution of newsletters and publications).

4.4.3. A balance with individuals' interests, rights and freedoms:

- a) LAHS will not impinge an individual's rights. LAHS will identify privacy risks and assess

whether legitimate interest is valid in each particular instance.

4.5. In order to function properly, LAHS collect personal data in the following ways:

4.5.1. Through a website membership form.

4.5.2. Through emails to LAHS officers.

4.5.3. Through letters written to LAHS.

4.6. Personal data collected will include:

4.6.1. Name

4.6.2. Address

4.6.3. Phone Number

4.6.4. Email Address

4.6.5. Bank details for payment of subscriptions

4.7.1 Your email address will not be used for any other purpose without your consent. LAHS will retain your email address only for as long as necessary to provide membership news and information, and publications.

5. Data Storage

5.1. Information and records relating to service users will be stored securely on an online server, which is only be accessible to designated LAHS officers (membership secretary and web officer. The treasurer will be able to see personal details that pertain to payment of subscriptions). Designation of responsibility for this authorisation sits with the Trustees and Management Committee.

5.2. Information will be stored for only as long as it is needed or required by statute and will be disposed of appropriately.

5.2.1. Unless otherwise confirmed through an auditable document such as a feedback form, data will be held only for 12 months after the termination of membership, after which it will be completely removed from all systems and data storage facilities.

5.3. If LAHS is requested to delete personal data, this will be done immediately and without question.

6. Data Processing

6.1. LAHS process personal data in the following ways:

6.1.1. Once a membership form is received, the personal data included in the form will be used in strict accordance with the content of the form.

6.1.2 To distribute publications, personal data (eg name, address, email address) will be given to a third party (a distributor) on condition of deletion immediately after the distribution has taken place.

6.1.3 To send out newsletters and information updates, names and email addresses will be given to a third party (newsletter) on condition of deletion immediately after termination of membership.

6.1.3. In this situation consent to process data is taken to have been given upon submission of the enquiry form.

7. Data Access and Accuracy

7.1. All Data Subjects have the right to access the information LAHS holds about them. LAHS will take reasonable steps ensure that this information is kept up to date by asking Data Subjects whether there have been any changes.

7.2. LAHS will ensure that:

- a) It has a Data Protection Officer with specific responsibility for ensuring compliance with Data Protection.
- b) Anybody processing personal information understands that they are legally responsible for following the GDPR.
- c) Anybody processing personal information is appropriately trained to do so.
- d) Anybody processing personal information is appropriately supervised.
- e) Anybody wanting to make enquiries about handling personal information knows what to do.
- f) It deals promptly and courteously with any enquiries about handling personal information.
- g) It describes clearly how it handles personal information.
- h) It will regularly review and audit the ways it holds, manages and uses personal information.
- i) It regularly assesses and evaluates its methods and performance in relation to handling personal information.
- j) All staff are aware that a breach of the rules and procedures identified in this policy may lead to disciplinary or legal action being taken against them or the organisation.

This policy will be updated as necessary to reflect best practice in data management, security and control and to ensure compliance with any changes or amendments made to the GDPR.

In case of any queries or questions in relation to this policy please contact the LAHS Data Protection Officer:

Charlotte Wilson

Office Address: The Guildhall, Leicester, LE1 5FQ

Email: membership@lahs.org.uk

Glossary of Terms

Data Controller – The person who (either alone or with others) decides what personal information LAHS will hold and how it will be held or used.

Data Protection Officer – The person(s) responsible for ensuring that LAHS follows its data protection policy and complies with the GDPR.

Individual/Customer/Data Subject – The person whose personal information is being held or processed by LAHS for example: a client, an employee, or supporter.

Explicit Consent – is a freely given, specific and informed agreement by an Individual/Service User in the processing of personal information about them. Explicit consent is needed for processing sensitive data.

Processing – means collecting, amending, handling, storing or disclosing personal information.

Personal Information – Information about living individuals that enables them to be

identified – e.g. name and address. It does not apply to information about organisations, companies and agencies but applies to named persons, such as individual volunteers or employees.