

WD Data Protection Policy

1st September 2024

The organisation which holds your data is Wargame Developments (WD). The Treasurer and Membership Secretary is responsible for data protection compliance. You can contact the Treasurer and Membership Secretary by writing to Wargame Developments, 84 Eglinton Hill, Shooters Hill, Plumstead, London, SE18 3DY or via the web site <http://www.wargamedevelopments.org/>.

What Personal Data does WD Hold?

Wargame Developments' main database contains the following information about members (and non-members who book places at events):

- Title
- First and Surname
- Home or contact address
- Telephone number
- Email address(es)
- Current subscription year
- Whether only an "E-member"
- Attendance at Conference of Wargamers (date of the year of last attendance/if currently attending and payment).
- Attendance at VCOW (an annual online-only conference)

Wargame Developments also maintains separate databases to hold the name and e-mail addresses of people attending other events other than COW:

- "Nemesis", used to allocate places in "numbers limited sessions" to people attending VCOW has names, e-mail addresses and details of sessions
- "Wagram" has names and e-mail addresses of members who have booked a place at the Autumn Virtual Gathering.

Other similar databases may be set up as necessary to manage future events.

In addition WD holds delegate lists for events such as COW which includes "housekeeping notes" for attendees who request, for example, a ground floor room and "catering notes" for attendees who specify "dietary requirements". Where these details may imply religious or philosophical beliefs or a medical condition it is considered to be low harm risk personal data.

Who does WD share data with?

WD does not routinely share information with third parties. The exceptions are likely to be:

- i. sharing of names in connection with booking accommodation for events such as COW, providing names and contact details and information required to complete the venue's delegate list, and providing names so that badges can be prepared for attendees.
- ii. your name and contact details will be made available to the presenter of any session at an event like VCOW where you ask to book a place in advance. Note that the presenter of a session you have booked a place at may circulate contact details to other attendees of that session so that players in a game can do some pre-planning.

WD will not give your contact details to anyone else unless required to do so by law.

If you want to contact a fellow member or attendee and do not have their contact details you can ask for a message including your contact details to be forwarded to the person concerned.

WD uses the data:

1. To produce the labels for THE NUGGET and any general letters that are sent out to members and to send the Conference of Wargamers programme to those who have booked to attend.
2. To send members the NUGGET password by post or e-mail.
3. To produce a printed list of attendees (including contact details) that is sent to the venue used to host the annual Conference of Wargamers. This list is a Health and Safety requirement of the venue, and the information therein is used solely for that purpose.
4. To send members (and non-members who have booked to attend events) information by e-mail about WD and its events.
5. If you book a place at COW or another event run by WD your name may appear in a list of attendees in The Nugget and may, with your contact details, be provided to other attendees. You can ask to use a pseudonym.
6. If you offer to run a session at a WD event your name will appear in a list of sessions in The Nugget which may also appear on the Internet. You can ask to use a pseudonym.
7. If material you submit to The Nugget or another WD publication is published your name will be included in the article, and may be included in any derived index, which may be published on the Internet. You can ask to use a pseudonym.
8. To contact members in an emergency or if urgent action is required.

Electronic records are held on password protected devices, backed up either onto portable hard drives which are kept in secure locations or backed up to remote locations.

WD maintains a shared drive in order to help manage the operations of the Group. The shared drive is segmented into areas of public access, member only access and committee access. Data stored includes: Committee meeting agendas and minutes, policies, master copies of the constitution, publications (including the Handbook and archival copies of The Nugget), the membership database, and event related publications and documentation (for COW, VCOW etc.).

The WD Shared Drive is maintained on third party servers and the storage of personal and other information on them is in accordance with the UK Information Commissioner's Office Guidance on International Transfers, more specifically such servers are either in the European Economic Area, or are in the USA and covered by the UK Extension to the EU-U.S. Data Privacy Framework.

Where personal data is include in a file it is kept in a separate area of the WD Shared Drive with access only provided to those who require it.

All members, including WD committee members, should ensure that any data

downloaded from the Shared Drive to local computers is managed in line with UK General Data Protection Regulations (GDPR) and this Policy. Members outside of the EU should only download data to systems covered by the UK-US Data Bridge and UK Extension to the EU-U.S. Data Privacy Framework.

Paper records are stored in secure locations.

The lawful bases for processing your data are "contract" and "legitimate interest". The legitimate interests for the processing of your data are to provide you with information relevant to your membership of WD and for the administration of the organisation, including making and retaining historic records of WD including minutes of general and committee meetings and membership lists.

Data Retention

- Members' and Attendees' personal data will be retained for two years and then deleted.
- The Minutes of and other documents relating to general meetings and committee meetings are retained indefinitely.
- Sundry correspondence is retained for up to six years and then deleted or destroyed unless it is considered to be an important part of the history of the WD when it may be retained indefinitely.

Your Rights

You have the following rights in respect of your personal data: the right to withdraw consent; the right of access; the right to rectification; the right to erasure; and the right to restrict processing. If you make a request regarding any of the above it will be dealt with within 28 days. If your request is refused you will be told why.

You also have the right to object to the processing of your personal data. If you make a request it will be dealt with within 28 days. If your request is refused you will be told why.