



The Olive Tree
Sutton Green Road
Sutton Green
Surrey
GU4 7QD

Data Protection Policy & Procedures

Introduction: The Olive Tree is committed to a policy of protecting the rights and privacy of individuals. We collect and use certain types of data in order to carry out the business of the pubs. This personal information will be collected and dealt with appropriately.

General Data Protection Regulations (GDPR) May 2018 - governs the use of information about people (personal data).

Personal data can be held on computers, laptops, mobile devices or in a manual file. This will include emails, texts messages and minutes of meeting. The Olive Tree will be the data controller for all information held.

The owners and management team who have access to personal information will be expected to read and comply with this policy.

Purpose: The purpose of this policy is to set out the Pubs' commitment and procedures for protecting personal data. The Olive Tree regards the lawful and correct treatment of personal information as very important to successful working, and to maintaining the confidence of those with whom we deal with.

GDPR: contains certain principles for processing personal data with which we must comply:
Personal data:-

Shall be processed fairly and lawfully and, in a transparent manner in relation to the data subject.

Shall be collected for specified, explicit and legitimate purposes, and shall not be further processed in a manner that is incompatible with those purposes.

Shall be adequate, relevant and limited to what is necessary in relation to those purposes for which data is processed.

Shall be accurate and where necessary, kept up to date. All reasonable steps will be taken to ensure that personal data that are inaccurate are either erased or rectified without delay.

Shall not be kept for longer than necessary for the purposes for which the personal data are processed.

Shall be kept secure by The Olive Tree (Data Controller) who takes appropriate technical and other measures to prevent unauthorised or unlawful processing or accidental loss or destruction of, or damage to, personal information

Personal information = information about living individuals that enables them to be identified i.e. names, addresses, telephone numbers, email addresses, NI number.

Responsibilities: The Olive Tree is the Data Controller under GDPR, and is legally responsible for complying with GDPR, which means that it determines what purposes personal information held will be used for. The Olive Tree will ensure that it is properly implemented, and will through strict application of criteria and controls:



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Observe conditions regarding fair collection and use of information
Meet legal obligations to specify purposes for which the information is used
Collect and process appropriate information to the extent that it is required to fulfil its operational needs or to comply with legal requirements
Ensure quality of information used
Ensure the rights of people about whom information is held, can be fully exercised under GDPR, including:-
Right to be informed that processing is being undertaken
Right of access to one's personal information
Right to prevent processing in certain circumstances
The right to correct, rectify or block information regarded as incorrect
Take appropriate security measure to safeguard personal information
Ensure personal information is not transferred abroad
Treat people fairly without prejudice when dealing with requests for information
Ensure response to requests for information is dealt with in a timely manner

The Data Protection Officer for The Olive Tree is: Nigel Farnfield

The Olive Tree Directors will have overall responsibility for ensuring this policy is implemented ensuring:-

Anyone processing personal information understands their responsibilities for following good data protection practice.

Anybody wanting to make enquiries about handling personal information knows what to do.

Deal promptly with any enquiries regarding handling personal information.

Will review at regular intervals the way it holds, manages and uses personal information.

Regularly assess and evaluate its methods and performance in relation to handling personal information.

Personal data held is up to date, removing old or out dated information.

The owners and management team are aware that a breach of the rules and procedures identified in this policy may lead to action being taken against them, ultimately resulting in expulsion from the Pub. Any breaches or loss of personal data must be reported to the Data Controller immediately.

We may update this privacy notice from time to time. When we change this notice in a material way, we will update the version date at the bottom of this page. For significant changes to this notice we will try to give you reasonable notice unless we are prevented from doing so. Where required by law we will seek your consent to changes in the way we use your personal information.

Data Collection: Informed Consent: Informed consent is when a Data Subject understands why information is required, who it will be shared with, possible consequences of them agreeing or refusing proposed use of the data and then gives their consent.

The Olive Tree will ensure data collected is within the boundaries defined in this policy. This applies to data that is collected via member registration forms, or by completing a form for payroll purposes.



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When collecting data, The Olive Tree will ensure that the Data Subject:-

Clearly understands why the information is required.

Understands what it will be used for and what the consequences are should the Data Subject decide not to give consent to processing.

As far as reasonably possible, grants explicit consent, via positive opt in for data to be processed.

Is as far as reasonably practicable, competent enough to give consent and has given so freely without any duress.

Procedures for Handling Data & Data Security: The Olive Tree owners and management team must ensure that personal data is dealt with properly no matter how it is collected, recorded or used. This applies whether the information is held on paper, computer, portable devices or recorded by other means.

Personal data relates to data of living individuals who can be identified from that data i.e. names, addresses, email address etc. Identification by data means, combining a number of data information and not just by name alone.

It is important that all The Olive Tree employees with access to personal data consider any information, which is not otherwise in the public domain, that can be used to identify an individual as personal data and observe the following guidance:-

Email: consider if incoming/outgoing email should be kept as an official record. If retained it should be stored/saved to an appropriate folder or printed and stored securely. Original emails should be deleted from mailbox and any "deleted items" box, either immediately or when it has ceased to be of use.

Phone Calls: can lead to unauthorised use or disclosure of personal information:- if you receive a phone call requesting any personal information or confirmation thereof regarding one of its members direct the phone call to the General Manager.

Laptops/Portable Devices: must be password protection and have suitable encryption programmes. Do not leave devices unattended in public places. If possible keep with you at all times whilst travelling ensuring device is locked.

Data Security/Storage: Store as little personal data as possible on your computer/laptop, only keep essential information. Save information securely, delete where necessary.

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

Passwords: Do not use passwords easy to guess. Ideally passwords should be 6 + characters long, contain upper and lower case letters, numbers and or special characters. Protect your password.

Risk Management: the consequences of breaching Data protection can cause harm or distress to service users if their information is released to inappropriate people, or they could be denied a service to which they are entitled. The Olive Tree committee and volunteers should be aware that they can be personally liable if they use members personal data inappropriately. This policy is designed to minimise the risks and to ensure that the reputation of The Olive Tree is not damaged through inappropriate or unauthorised access and sharing.



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Changes to this Privacy Policy

We may change this privacy notice from time to time by updating this page in order to reflect changes in the law and/or our privacy practices. We encourage you to check this privacy notice for changes whenever you visit our websites.

Concerns and Contact Details

If you need to contact us regarding our Privacy Policy or any other related issue please write to:

Data Protection Officer
The Olive Tree Pub
Sutton Green Road
Sutton Green
Guildford
Surrey
GU4 7QD
or email: data@theolivetreesuttongreen.co.uk

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