

St Albans Civic Society

General Data Protection Regulation privacy policy

1. Introduction

St Albans Civic Society (**'the Society'**) is committed to protecting the privacy and personal information of our members. This privacy policy is about

- the information that we hold from which individuals can be identified (**'Personal Data'**);
- how we deal with Personal Data; and
- who we may share it with.

This privacy policy also provides information on your legal rights in relation to your Personal Data.

It was approved by the Trustees of the Society on 2 May 2018.

2. Changes to this Privacy Policy

From time to time we may change the way we use your Personal Data and amend this privacy policy. The current version of our privacy policy will be displayed on our website and can be requested by e-mailing: datastacs@gmail.com

If the changes are particularly significant, we would seek to draw your attention to them through e-mails, newsletters and/or other means.

3. What Personal Data do we collect and use?

The Personal Data about you that we collect and use is principally:

- your name and postal address;
- your contact details including e-mail address; and
- details of payments made to the Society for membership, events, etc.

In some cases, it may include other Personal Data that you may provide to us from time to time.

4. How your Personal Data is collected

We collect Personal Data about you from:

- your membership application;
- any information you supply to us as to change of address or as to e-mail address; and
- payments made by you to us.

Only in extraordinary circumstances would we hold Personal Data relating to you which had been supplied by anyone other than you. An example might be where a new member was introduced to the Society by an existing member who supplied contact details.

If you decide to supply Personal Data to us about another person, please ensure that you do so only with that person's approval.

5. What we use your Personal Data for

We may use your Personal Data for one or more of the following purposes:

- delivering newsletters to your postal address; and
- sending you e-mail newsletters and other communications.

Other than as above, we would not expect to make any use of your Personal Data.

6. Your rights in relation to your Personal Data

You can tell us that you no longer wish to receive communications from us either of a particular kind or at all by sending an e-mail to that effect to: datastacs@gmail.com

7. The lawful grounds on which we collect and process your Personal Data

We process your Personal Data for the above purposes relying on one or more of the following lawful grounds:

- that by choosing to become a member you have given your implicit consent to us holding limited Personal Data;
- that we have a legitimate interest in holding limited Personal Data in order to fulfil our contractual commitment to you as a member of the Society and to meet our obligation to provide you with the benefits of the membership for which you have paid.

8. Our legal obligations regarding your data

We collect and process your Personal Data in accordance with applicable laws that regulate data protection and privacy. This includes, without limitation, the EU General Data Protection Regulation (2016/679) ('**GDPR**') and the UK Data Protection Act 2018 ('**DPA**') together with other applicable UK and EU laws that regulate the collection, processing and privacy of your Personal Data (together, '**Data Protection Law**').

9. Disclosing your Personal Data to third parties

We may on rare occasions need to disclose your Personal Data to certain third party organisations who are processing data only in accordance with our instructions under contract (called '**data processors**') where we use such organisations to assist in delivering membership benefits.

It is unlikely, but conceivable, that we might disclose your Personal Data to third parties who make their own determination as to how they process your Personal Data and for what purpose(s) (called '**data controllers**'). In those circumstances, we would expect to notify you so that you could check the relevant privacy policies of those organisations to understand how they may use your Personal Data. Since they would be acting outside our control, we would have no responsibility for the data processing practices of such data controllers.

Other than in the rare and unlikely circumstances described above, we will treat your Personal Data as private and will not disclose your Personal Data to third parties without you knowing about it. The only exceptions would be where we use third party data processors who are engaged under contract to handle data on our behalf (for example an IT supplier or database hosting provider). In relation to these data processors, we will take all reasonable steps to ensure that they

- act only in accordance with our instructions;

- only use your Personal Data for lawful purposes and in compliance with applicable data protection law; and
- put adequate safeguards in place to protect your Personal Data.

10. How long we retain your Personal Data for

We shall only retain your Personal Data for as long as you remain a member of the Society and for a reasonable period after the expiry and non-renewal of your membership and you have not communicated to us any intention to terminate your membership or not to renew it

In accordance with our legal duties, we have a Personal Data retention policy (which is available on request) that sets out the different retention periods for Personal Data. The criteria we use for determining these retention periods is based on various legislative requirements; the purpose for which we hold Personal Data; and guidance issued by relevant regulatory authorities including but not limited to the UK Information Commissioner's Office (ICO).

We shall take all reasonable steps to ensure that we dispose of Personal Data that we decide no longer to retain securely.

11. Security that we use to protect Personal Data

We employ appropriate technical and organisational security measures to protect your Personal Data from being accessed by unauthorised persons and against unlawful processing, accidental loss, destruction and damage.

We also endeavour to take all reasonable steps to protect Personal Data from external threats such as malicious software or hacking. However, please be aware that there are always inherent risks in sending information by public networks or using public computers and so we cannot guarantee the security of all data sent to us (including Personal Data).

12. Your Personal Data rights

You have a statutory right ('**Subject Access Request**') to request information, including information about:

- the Personal Data that we hold about you;
- what we use that Personal Data for; and
- to whom it may be disclosed.

Usually we will have a month to respond to such as Subject Access Request. We reserve the right to verify your identity if you make such a Subject Access Request and we may, in case of complex requests, require a further two months to respond. We may also charge for administrative time in dealing with any manifestly unreasonable or excessive requests for information. We may also rely upon certain legal exemptions when responding to your request.

You also have the following statutory rights, which are exercisable by making a request to us in writing:

- to require that we correct Personal Data that we hold about you which is inaccurate or incomplete;
- to require that we erase your Personal Data without undue delay, if we no longer need to hold or process it;
- to object to our use of your Personal Data for direct marketing; or

- to require that we do not use of your Personal Data otherwise than in compliance with the policy statements above unless we have a legitimate reason for so using it.

All of these requests may be forwarded on to a third party provider who is involved in the processing of your Personal Data on our behalf.

If you would like to exercise any of the rights set out above, please contact us at the address below.

If you make a request and are not satisfied with our response, or believe that we are illegally processing your Personal Data, you have the right to complain to the Information Commissioner's Office (ICO) – see <https://ico.org.uk>.

13. Contact details

If you have any queries regarding this Privacy Policy or wish to make a further request relating to how we use your Personal Data as described above, please contact: datastacs@gmail.com

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