Rotary Club of Swanage & Purbeck Privacy Notice

The Rotary Club of Swanage & Purbeck ("we") promise to respect the confidentiality of any personal data you share with us to keep it safe, and we will always take every effort to protect your privacy. We pride ourselves on our honesty and openness and will always be clear how, when and why we collect and process your information; we promise we will never do anything with your details that you wouldn't reasonably expect.

Developing a better understanding of our members and donors is crucial, and your personal data allows us to manage your membership and provide the services you are entitled to.

We collect information in the following ways:

When you give it to us DIRECTLY

There are many ways you may give us your information. For example, when you join as a member, begin volunteering, make a donation or communicate with us either by phone, in writing, including email or in person. We are responsible for your data at all times.

When you give it to us INDIRECTLY

Via Social Media

Depending on your settings or the privacy notices for social media and messaging services like Facebook, WhatsApp, LinkedIn or Twitter, you might give us permission to access information from those accounts or services.

Via information available publicly

This may include information found in places such websites (club, district, action groups etc), Companies House and information that has been published in articles/newspapers.

What personal information we collect and how we use it

We will only ever capture the minimum amount of information that we need to in relation to your membership, donation or services we provide to you and we promise to keep your information secure. The personal data we will usually collect is:

Your name

Your contact details

Your date of birth

Your bank or credit card details (as relevant to the service provided)

Details of the enquiry, service or product

Where it is appropriate, we may also ask for additional information

How we will use your data

We will use your personal data for the legitimate interest of conducting core business activities, these will include:

Administering your membership or donation, including processing Gift Aid

Provide you with the services, products or information you asked for including Disclosure and Barring Service checks.

Communicating organisational messages and information to members,

Supporting 'The Rotarian' and 'Rotary' magazines

Supporting The Rotary Foundation (TRF) and the Rotary Foundation United Kingdom

Providing information and updates to district and club officers on RI and RIBI programmes and service projects

Preparation of Rotary directories

To present our website and its contents to you and to allow you to participate in interactive features on our website

Keep a record of your relationship with us

Understand how we can improve our services, products or information

In any other way we may describe when you provide the information

For any other purposes with your consent

Sensitive information

We do not collect any personal information on members classified as 'sensitive' under GDPR.

Employees

Interact, Rotakids and under 18's data

We do not collect information from under 18's. Interact and Rotakids clubs are managed through the identified Rotarian member contact where applicable.

Data Sharing

1) Our service/host providers

HMRC – for Gift Aid, tax and employment details

Rotary International

We will ensure that data processing agreements, compliant to GDPR, are in place before sharing with, or giving access to, your data with any of our service/host providers.

2) Sharing within the Rotary organisation

We will not share your information with any Third Party without first obtaining your permission to do so. We will ensure that data processing agreements, compliant to GDPR, are in place before sharing your data within the wider Rotary organisation.

Our Rotary club is a data processor for some of your personal information associated with your membership and will process your data in accordance with the <u>RIBI privacy notice</u>.

3) Sharing with third parties

We will never commercially sell your personal data to anyone else. We will only ever share your personal data in other circumstances, not listed above, if we have your explicit and informed consent at the time of collection. However, we may need to disclose your details if required to the police, other agencies, for example HMRC, regulatory bodies or our legal advisors.

How we keep your information safe and who has access to it

We ensure that there are appropriate physical and technical controls in place to protect your personal details. For example, confidential paper records are securely stored, our online forms and our network is protected and routinely monitored. Confidential paper waste is shredded at our premises.

We undertake regular reviews of who has access to information that we hold to ensure that your personal information is only accessible by appropriate staff, Rotary members and our service/host providers.

We do comprehensive checks on the companies we use before we work with them and put a contract in place that sets out our expectations and requirements, especially regarding how they manage the personal data they may have access to as part of providing those services.

We have a duty to report certain types of personal data breaches to the relevant supervisory authority, and where feasible, we will do this within 72 hours of becoming aware of the breach. If a breach is detected and likely to result in a high risk of adversely affecting you, we will inform you without undue delay.

Where we store your information

Your personal information will be hosted securely within the UK or the EU by The Rotary Club of Swanage & Purbeck.

However, Rotary International runs its operations outside the European Economic Area (EEA).

Although they may not be subject to the same data protection laws as organisations based in the UK, we will take steps to make sure they provide an adequate level of protection in accordance with UK data protection law. By submitting your personal information to us you understand your personal data will be transferred, stored and processed at a location outside the EEA. You can view Rotary International's privacy notice by visiting their website.

How long we retain your information and how we keep it up to date

We will only keep your information for as long as we need it to assist you with your enquiry, process your membership, donation, event registration or other services associated to your Rotary membership. There are statutory timescales on how long we should keep your information, for example, gift aid transactions must be retained indefinitely, financial records must be kept for 7 years, information associated with Health & Safety for three years after an event. We shall delete your information according to these statutory limits, or according to guidance issued by the Information Commissioner.

Individual members are responsible for keeping their own personal data up to date and have access to the RIBI Data Management System (DMS) or My Rotary on the RIBI website for this purpose. In addition, where necessary, we will keep your information accurate and up-to-date.

Your rights

The General Data Protection Regulations gives you certain rights and these are listed below for your convenience, further clarification of your rights is available on the **Information Commissioners** website

You have a right to be informed when your personal data is being collected, what is collected and how it will be used or shared.

You have a right of access to your personal data: the right of access allows you to be aware of and verify the lawfulness of the processing of your personal data. Members and donors have access to their personal data via self-service systems such as the RIBI Data Management System (DMS) or My Rotary via the RI website. You can also request a copy of the information which we hold on you. This information will be provided free of charge, unless the request is found to be manifestly unfounded or excessive then a reasonable fee will be charged. The application should be made in writing, by letter or email, and addressed to the Club's Data Protection (Monitoring) Officer, contact details shown below, enclosing two proofs of identification.

Applicants should be aware that where requests are manifestly unfounded or excessive, in particular because they are repetitive, we can:

- charge a reasonable fee taking into account the administrative costs of providing the information; or refuse to respond.
- You have a right in certain circumstances to have inaccurate personal data rectified, blocked (restrict processing), erased (right to be forgotten), or destroyed.

You have a right in certain circumstances to object to the processing of your personal data for such reasons as direct marketing, automated decision making, profiling; although we can confirm we make no decisions on you using an automated process.

You have a right in certain circumstances to data portability.

In certain situations, these rights may not apply, for example if you are a valid member we will need to communicate with you about your membership and those services afforded to you as part of that membership; you hold a club or district office and we need to communicate with you in relation to that office, in which case you will not be able to unsubscribe from these communications.

We collect and process your personal data through legitimate interests or because you have provided it to us to enable us to deliver a service to you. We will only process your personal data as you would reasonable expect us to. You can opt out of our general member mailings at any time.

Finally, if you are unhappy with how we have processed your information, you have the right to lodge a complaint with the Office of the Information Commissioner, contact details below.

Changes to this privacy notice

We may change this privacy Notice from time to time. If we make any significant changes in the way we treat your personal information we will make this clear on our website www.swanagerotary.org or by notifying you directly.

Complaints

If you are unhappy with how we have processed your personal information, please firstly contact the Club's DP(M)O Rotarian Steve Parsons, If you are still unhappy you may contact the following:

Information Commissioner's Office

Wycliffe House, Water Lane Wilmslow, Cheshire, SK9 5AF

Helpline: 0303 123 1113 (local rate) or 01625 545745

[This privacy notice was last reviewed and updated 1st May 2018 and approved by the Club Council on 10th May 2018].