

Swanage & Purbeck Rotary CIO Privacy Notice (including use of Cookies)

Swanage & Purbeck Rotary CIO (“we”, “us”, “our”) promise to respect the confidentiality of any personal data you share with us, or that we have access to through Rotary International (RI), Rotary International in Great Britain and Ireland (RIBI) or Rotary International District 1110 (Wessex Rotary) 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, supporters and donors is crucial, and your personal data allows us to manage our relationship 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, purchase our products 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

Your information may be shared with us by independent organisations, for example sites like Swanage News, Purbeck FM, Purbeck Gazette or other such services. These independent third parties will only share your information when you have consented. You should check their Privacy Notice when you provide your information to understand fully how they will process your data.

Via Social Media

Depending on your settings or the privacy notices for social media and messaging services like Facebook, WhatsApp, Twitter or Instagram, 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 as websites (club, district, action groups etc), Charity Commission and information that has been published in articles/newspapers.

Cookies

Like most websites, we use “cookies” to help us make our site, and the way you use it, better. We do not store any personal data in the cookies that we use.

Cookies mean that a website will remember you. They're small text files that sites transfer to your computer (or phone or tablet). They make interacting with a website faster and easier – for example by automatically filling your name and address in text fields.

In addition, the type of device you're using to access our website or apps and the settings on that device may provide us with information about your device, including what type of

device it is, what specific device you have, what operating system you're using, what your device settings are. Your device manufacturer or operating system provider will have more details about what information your device makes available to us.

The type and quantity of information we collect and how we use it depends on why you are providing it. You should be able to control what cookies are placed on your device through your browser settings. Go to www.aboutcookies.org to find out more about cookies, including how to see what cookies have been set and how to manage and delete them.

We use Google Analytics and similar tools to analyse the use of our websites by generating statistical and other information.

Details captured during your visit to our websites will include, but are not limited to, traffic data, location data, weblogs and other communication data and the resources you access. However, all data collected is anonymous and will not identify you as an individual.

Google, not the Association, stores this activity information. You can view Google's privacy notice here. <https://policies.google.com/privacy?hl=en-GB&gl=uk>

To opt out of being tracked by Google Analytics across all websites visit their website here. <https://tools.google.com/dlpage/gaoptout>

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, support, 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 (if a member)
- Your bank or credit card details (as relevant to the service provided)
- Your insurance 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:

- Administer your membership or donation, including processing Gift Aid
- Provide you with the services, products or information you asked for
- Providing services, products, guidance or information to clubs and districts for their general activities, including Disclosure and Barring Service checks
- Communicating organisational messages and information to members, district and club officers
- Facilitate conference, training seminars, meetings and other special event planning
- 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 member and partner handbooks

- Identifying candidates for Presidential and Foundation appointments to conferences
- Appointments to committees, club and district offices, task forces and other assignments within the Rotary organisation
- To present our website and its contents to you and to allow you to participate in interactive features on our website
- For HR/Employment records for staff
- 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

We will collect all personal information required to comply with employment legislation, including where necessary sensitive information. This may include medical information and where additionally appropriate we will perform a criminal record search. To prevent discrimination and to ensure diversity, we shall request information from the employee on religion, sexuality and ethnicity.

Suppliers and Customers

We will collect all information required to manage payments to suppliers and collections from customers. This may include a credit score, name, address, bank details, contact information, transaction history and similar data.

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.

The RIBI District Youth Exchange Association operates as a separate entity to us and is responsible for the organisation of Rotary youth exchange programmes. You can view their privacy notice by visiting their website here. <https://www.youthexchange.org.uk>.

CCTV

In order to prevent and detect crime, and to ensure the safety of our members, volunteers and staff, we may operate CCTV at sensitive places. These cameras would record footage in real-time and be operated and controlled by our own staff. We would only share this information when requested to do so as required by law, police investigation, or if pertinent to judicial or governmental investigation.

Recording Telephone Calls

We may use a voice-telephony system. From time to time we may record calls for the purposes of:

- providing clarification and confirmation of information given or received
- enabling quality monitoring of Support Centre staff
- effective staff training

If recording is in operation, callers will be informed that their calls are being recorded for these purposes when they call us.

Data recorded by the telephone voice recording system will only be used for the purposes set out above. The data shall be held securely and accessed by authorised users only. Within the scope of usage described above, we may export data from the voice recorder. Exported data shall be stored in secure locations but be deleted within 12 months of capture.

Data Sharing

1) Our service/host providers

In the course of our legitimate business activities, there may be a need for us to share, or give access to, your personal data to third parties that provide us with services or host our applications/software that you may access, for instance:

- Our IT development, management and support
- Banking organisations – those that provide our banking/payment services
- Our payment facility for EventsAir
- Our magazine publishers and distribution providers
- Our event management software provider
- HMRC – for Gift Aid, tax and employment details
- Our website development and support provider
- Our communication mailing software service provider
- Our digital archiving support provider
- Our donations database provider
- Rotary International
- Our confidential paper disposal provider
- Our survey software support and host provider
- Our online shop service provider
- Provider of voting delegate services

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

The Rotary organisation is made up of Rotary International, The Rotary Foundation (TRF), Rotary International in Great Britain and Ireland, the Rotary Foundation United Kingdom (RFUK), the RIBI Donations Trust, Rotary Districts, Rotary District Trusts, Clubs, Club Trusts, limited companies and CIOs.

When you give information to us it may be shared within the wider organisation to facilitate your membership or donations and to provide the service afforded to you as part of that membership/donation. We will ensure that data processing agreements, compliant to GDPR, are in place before sharing your data within the wider organisation.

Rotary clubs and districts within Rotary International in Great Britain and Ireland are data processors for some of your personal information associated with your membership or support for our charitable activities and will process your data in accordance with the RIBI privacy notice. Clubs and districts also collect personal data for their individual club and district activities and are therefore also independent data controllers. This means they are also legally responsible for protecting your data under GDPR legislation whilst in their safekeeping and will have their own privacy notices in this respect.

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 are encrypted and our network is protected and routinely monitored. Confidential paper waste is shredded at our premises or burned.

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 us.

However, Rotary International run 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 may be transferred, stored and processed at a location outside the EEA. You can view Rotary International's privacy notice by visiting their website here <https://my.rotary.org/en/privacy-policy>

Any information transferred to RIBI is covered by their privacy policy, which can be found here <https://www.rotarygbi.org/privacy-policy/>

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 our relationship to you. There are statutory timescales on how long we should keep your information, for example, gift aid transactions must be retained indefinitely, employment records for 6 years after an employee leaves, 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.

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 <https://ico.org.uk/for-organisations/guide-to-data-protection/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/>

- 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. 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 Swanage & Purbeck Rotary CIO Secretary, 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.

Our contact details

Secretary
Swanage & Purbeck Rotary CIO
19 Gannetts Park
Swanage
Dorset
BH19 1PF

Complaints

If you are unhappy with how we have processed your personal information, please firstly contact the Secretary, details above. 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 ++44 1625 545 745

[This privacy notice was last reviewed and updated 27th January 2021]