



Bishopsgate Ward Club

Privacy Policy

INTRODUCTION

On 25th May 2018 new legislation on Data Protection enters into force (The General Data Protection Regulation - "GDPR"). GDPR replaces previous legislation and contains lots of obligations which the Club must fulfil and lots of rights which you as Members have vis-à-vis the Club. Many of the Rules are the same as under previous legislation but there is plenty of new material. GDPR is an EU Directive directly applicable in all Member states without the need for local legislation and with effect from 25th May 2018. However, the UK has decided that it wants the content of GDPR to apply after the UK leaves the EU and has tabled a Bill in the House of Lords which will achieve this objective. At first sight the Bill looks the same as GDPR (with adjustments which the Club believes are mainly not relevant to the Club's position) but things change and the Club will need to review its position once the Bill becomes law. GDPR, including its preamble, contains some 54,000 words so the Club hopes you will be understanding if we attempt to reduce that to some succinct explanations at the risk of leaving some questions in Members' minds. All such questions and doubts can be emailed (or sent by post) to the Club. GDPR already allows the Club ("Controller" in GDPR-speak) to introduce operational rules and policies compliant with the new Directive.

GDPR changes the way the relationship between the Club and its Members works in relation to the information (data) which the Club collects from you and then processes and stores. Some data is necessarily provided to a third party such as an event venue or the Hon. Treasurer. Most of the law is mandatory but where there are options this notice will identify and explain the option the Club is using. Many of the terms are rather technical but we need to use specific terms in order to say exactly what GDPR stipulates. The Club's first task is to be a lawful processor of your data.

LAWFUL PROCESSING

Membership of the Club is a form of contract where Members pay a subscription in return for which Members receive benefits and services provided by the Club. The Club asserts that it is a lawful processor by virtue of this relationship and does not need to obtain specific consent to process data. The Club also considers it is exempted from any obligation to appoint a Data Protection Officer but it does accept the obligation to carry out processing in ways which are lawful, fair and transparent. The Club may be required to appoint a designated DPO by the UK legislation.

TYPES OF DATA COLLECTED AND STORED

The Club is committed to recording accurate personal data which consists of the information on the Membership Application Form. No bank account details are recorded by the Club, but these details may be requested by the Hon. Treasurer to process a refund to a Member, and in that case the information may be given by telephone, email or post.

The Club does not collect sensitive personal data such as genetic, biometric or health data nor information on race, ethnicity, religion, political persuasion, or sexual orientation. Such sensitive data is known in GDPR as *special category data*. The Club may verify the information supplied in the Membership Application Form but does not seek additional information when considering an application. If information is published (i.e. in the public domain) about a Member, e.g. personal, professional or civic honour, the Club is likely to add such information to your Member record.

In the event of there being a data breach the Club undertakes to inform you (as well as any relevant authority) not later than 1 month of the Club becoming aware of the breach. The Club does not believe that the data it holds give rise to any need to report a breach to the Information Commissioner within 72 hours but it is conscious of the possible need to do so. Paper records are also held securely.

TRANSFER AND SHARING OF DATA

The Hon. Secretary is the principal processor of your data. The Club's Officers may also wish to look at Member data from time to time. In order to preserve a good history of the Club, copies of past membership lists are sent to the archives at the Bishopsgate Institute; the agreement with Bishopsgate Ward Club specifies that the Institute then becomes responsible for safe storage and control of access to these paper archives and must seek Club approval for access by third parties. The files are stored in the Institute's archive area, accessible by authorised personnel only.

When you attend functions or events organised by the Club the venue will normally, for security and practical reasons, want a list of names and dietary or other requirements. The Club does not send your data to any other third party and does not make your data available via the website. The Club keeps your data on a personal computer located in the UK which is password-protected and backed up regularly.

RETENTION OF DATA

The Club intends to hold your data throughout the period of your Membership and applying the following post-Membership policies:

In the case of resignation, for three years.

In the case of exclusion, for eight years (in order that appropriate institutional memory exists of the circumstances).

In the case of death, indefinitely, for archival purposes only, but the Club will consider requests for erasure from immediate family and/or executors.

YOUR RIGHTS

- To complain

Ideally the Club would wish to try to deal with complaints itself before recourse to any external authority and asks Members to submit complaints via email or post but it is open to Members to submit a complaint at any time to the Office of the Information Commissioner.

- To have correct data recorded by the Club

The Club will be happy to correct errors.

- To require the Club to erase data which it holds about a Member

The Club will fully respect the new legislation but reminds Members that the low-level information gathered by the Club is perceived by the Club as the minimum needed to provide Members with the benefits of Club Membership.

THE CLUB WEBSITE

No member data is available on or via the website other than the names of current and past Officers. There is a link to this policy on the website.

UPDATES

Whenever this policy is updated a notice will be sent to Members. This policy will be reviewed not later than May 2019 and annually thereafter.

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We are pleased to acknowledge the help of the City Livery Club in the design of this policy.