### Windsor Probus – Website Privacy Policy

### 1 Introduction

On the 25th May 2018, the new General Data Protection Regulation (GDPR) came into effect, replacing the previous Data Protection Act. The Probus Club cares about members' personal data and the new Regulation provides the necessary legislation to ensure that the Club has the consent of members to hold this data and that it can demonstrate that the holding of such data is in the legitimate interest of the Club. This Privacy policy has been adopted by the Club to satisfy this requirement.

# 2 Lawful Basis

The GDPR says that processing of personal data is lawful if "processing is necessary for the performance of a contract". Membership of Probus is conditional upon a subscription being paid and therefore the Club is fulfilling a contract. This is the lawful basis by which the Club collects and uses personal data.

# **3 Information We Collect**

Prospective members are asked to complete an application form which asks for:

Full Name, Date of Birth, Postal Address, Preferred Telephone Number and Email Address.

The Data Controller for the Club is the Hon Secretary.

# **4** Subscription Payments

Personal data includes banking details. It is normal practice for members to pay subscriptions, for monthly lunches and other organised events by cheque or cash. With the agreement of the Treasurer, members may also pay by bank transfer.

# **5 Photographs**

Photographs in which individuals can be identified are regarded as personal data. The Club holds photographs of members which are shown in the private Members' pages of the Club website. Photographs of groups of members may be taken during Club events or external outings. On occasions, these group photographs may be published in the Probus Magazine, the published Journal of the Probus Clubs of Great Britain and Ireland.

### 6 How We Use Your Information

We use the information solely to communicate with members and to ensure that the Club is run to the satisfaction of and wholly in the interests of the Members.

### 7 Email addresses

The preferred choice of communication is by email. The Committee believes that the most probable risk of personal data loss relates to the careless use of email addresses and/or hacking by third parties. To minimise this risk, the Committee has agreed that all general distribution emails originated by the Secretary or any other Club official will be emailed as blind copies (bcc).

### 8 Cookies

Our Club website makes use of essential Cookies. Neither the Club nor the hosts of this website records usage and does not undertake any analysis of website usage involving personal data.

# 9 How We Share Your Information

- 9.1 We share your information within the Club:
- [a] by the production of an annual Membership card
- [b] through information contained in the private Members pages of the Club website

9.2 No personal data will ever be given to third parties. In the event of such a request being made, it will always be referred back to the individual member concerned.

9.3 Our website designer has access to the members' data and has agreed not to use this data for any purpose other than in maintaining the said website.

#### **10 How We Store your information**

Club records are kept in two formats, as original hardcopy and digitally.

- 10.1 Hardcopy format
- [a] all documents and related records are held by the Secretary and/or Treasurer
- [b] banking details, if applicable, are held by the Treasurer
- 10.2 Digital format
- [a] an Excel spreadsheet, access to which is password protected
- [b] our Email site, hosted by one.com, access to which is password protected

[c] our Club website, hosted by WiX, which includes a Members Section, access to which is available only to members via an individual password. The Secretary, one other nominated Probus member and our website designer have "updating" access to the full site.

The Excel spreadsheet [Item 10.2.a] is backed up regularly.

#### 10.3 Length of Retention

[a] All personal data will be retained for as long as the individual either remains a member of the Club or has a valid reason to be directly connected with the Club.

[b] The Secretary will retain such records as are necessary so that the Club can stay in touch with the widow or partner of a deceased member.

# **11 Change of Personal Data**

In the event that a Member or other contact either wishes to exercise their right to view stored data relating to them or to have their data updated, they should contact the Secretary by email at <u>info@windsorprobusclub.org.uk</u>

Windsor Probus Club Committee: adopted 25th May 2018