

Privacy Policy for the Rotary Club of Fishponds & Downend, Bristol

1. General Statements

For the purpose of this Privacy Policy: 'Rotary' includes: Rotary International, Rotary Great Britain & Ireland, Rotary Foundation United Kingdom and the RGBI Donations Trust. We are Fishponds & Downend Rotary Club (here-in abbreviated to 'F&DRC') being the Rotary body issuing this Privacy Policy.

GDPR is defined as: The General Data Protection Regulation (EU) 2016/679 is a regulation in European Union law on data protection and privacy in the EU and the European Economic Area (EEA). It also addresses the transfer of personal data outside the EU and EEA areas. The Data Protection Act 2018, enshrines GDPR in British Law.

F&DRC promise to respect the confidentiality of personal data you share with us, or to which we have access-to through both the 'Rotary Data Management System' (DMS) and the 'Rotary Template Website System', or through public resources. We undertake to keep such personal data safe, and to take every reasonable effort to protect your privacy.

This Privacy Policy complies with, and interfaces with, all other Rotary Privacy Policies which are referenced in Clause 12 below.

This Privacy Policy sets-out the terms of the commitment to respect your privacy rights as non-members of Rotary and assure that:

- Your personal data will be treated with care and confidentiality whilst F&DRC is engaged in the lawful pursuit of Rotary business.
- Your personal data will neither be consciously disclosed or utilized, in any unlawful or unadvised manner which may, as a result, place your personal data and therefore you, or your dependents, or your property, or your reputation to the risk of inappropriate or malicious actions by other persons or organisations, irrespective of such actions being related or consequential.

For the purposes of this Privacy Policy, "non-members" includes persons who have become associated or in some way connected with F&DRC, as listed in, but not necessarily limited to, the following:

- Friends of F&DRC, and Partners, spouses and other family members of F&DRC Members.
- Rotarians belonging to other Rotary groups and bodies with whom we communicate and cooperate in the pursuit of Rotary activities.
- Persons below the age of 18, including Interactors and Rotakids (all with the express permission of parents/guardians).
- Volunteers who assist F&DRC.
- Competitors, participants and spectators at F&DRC events and projects.
- Students or volunteers, RYLA participants etc. as sponsored by Rotary.
- Contractors or suppliers of services and goods.
- Members of the Public to which we provide 'Service'.
- Members of the Public attending our events and projects who may provide limited personal data in some form of participation in the event (raffles, and draws etc.), plus those who make membership or volunteering enquiries.

We collect information in the following ways:

- When you give it to us **directly**: for example, when you join as a member, begin volunteering, make a donation, purchase our products, or communicate with us either by phone, email, SMS text, or in person.
- When you give it to us **indirectly**: for example, your information may be shared with us by independent organisations, for example sites like 'Virgin Money Giving' or 'BT MyDonate' or other such services. These independent third parties will only share your information when you have consented. You should check their Privacy Policies when you provide your personal data to understand fully how they will process your personal data.
- Via **Social Media**: depending on your settings or the privacy policies for social media and messaging services like YouTube, Facebook, Instagram, WhatsApp, Snapchat, LinkedIn or Twitter, etc., you might grant us permission to access personal data from those accounts or services.
- Via information **available publicly**: for example, this may include personal data found in places such as websites, Companies House and information that has been published in articles in printed media distributions and broadcasts.

F&DRC Members, when collecting personal data belonging to non-members for Rotary activities, are 'Independent Data Controllers'. This means that they are also legally responsible for protecting your personal data, whilst in their safekeeping, under GDPR legislation; in accordance with F&DRC Privacy Policies: being this Privacy Policy and the detailed Member's Privacy Policy (privy to members).

F&DRC is committed to:

- Ensuring that all reasonable steps are taken to collect, process, store and use non-members personal data **in accordance with Data Protection Laws**, including the Guiding Principles, and the relevant Rotary Privacy Statements.
- Offering all F&DRC Members with information and advice to ensure that, where they have a responsibility for the utilization of personal data belonging to non-members, they do so **in accordance with F&DRC Privacy Policies**.
- Establishing systems and procedures that will **ensure F&DRC Members comply** with Rotary Privacy Policies including procedural guidelines.
- Ensuring that on collecting personal data, any documents include, or refer to, this F&DRC Privacy Policy, and all other aligned Rotary Privacy Policies and Statements. This is regardless of whether the privacy policies and/or statements are included in full on documentation/forms, or included in full on our Rotary Club website and referenced to on documentation/forms.

2. What personal data related to non-members do we capture?

We will seek to capture only the **minimum amount** of personal data that we need to in relation to your involvement with us by donation, services you provide or are provided with, as participants in our events and projects, or within discussions relating to your potential involvement with Rotary.

We promise to keep your personal data secure. The personal data we can collect is usually limited to the following (but only as appropriate or necessary):

- Your name **as provided** by you. (F&P)
- Your contact details, including the following as declared by you:
 - telephone number(s) (F&P)
 - email address(es) (F&P)
 - social media tag(s) / handle(s) / ID(s) / username(s) / address(es) (F&P)
 - home address(es) (F&P)
 - business address(es).
- Your date of birth.
- Your bank or credit card details (as relevant to the service provided).
- Photographs / video footage whilst engaged in presentations, events and/or projects. (F&P)
- Details of the enquiry, service or product.

As a member of a 'Friends' or 'Partners' group we will seek your written permission, at the start of each Rotary Year, to store, process and share selective personal data as denoted 'F&P' above, plus your Club allocated name, Club allocated email address and any declared details of when you will be available for F&DRC activities.

After an immediate single usage of your data (as granted by you on data collection) you **may request to opt out** of the further use, storage, processing or sharing of any, or all, of the above personal data by Rotary.

Where it is appropriate and necessary, we may also ask for additional personal data related to the specific event or project. This data will be securely recorded, maintained and stored by the nominated leader of the event or project. The necessity to retain this additional personal data will be reviewed as necessary by the F&DRC Data Protection Officer (CDPO). The outcome of the review will be retained in F&DRC records, and additional personal data will be deleted as and when deemed necessary.

For repeat events, we may use previously recorded personal data to inform you of the next relevant event. Otherwise we **will not** retain your personal data when it has no further use. For non-members who are in our 'Friends' and 'Partners' groups, we will remind you, annually, of the personal data we retain. We will always request non-members to confirm their willingness to have such personal data retained.

3. What sensitive personal data do we capture?

We do not collect any personal data classified as 'sensitive' under GDPR. (Examples are: "religion", "ethnicity", "gender identity" and "political preferences").

4. How will we use your personal data?

We will use your personal data for the legitimate interest of conducting core F&DRC activities. These may include those listed in, but not necessarily limited to, the following:

- Administering your participation or donation, including processing Gift Aid.
- Providing you with the services, products or information for which you have asked.
- Provision of services, products, guidance and/or information to Rotary Clubs for their general activities, including 'Disclosure and Barring Service' (DBS) checks. For further information on the latter see: <https://www.gov.uk/government/organisations/disclosure-and-barring-service>
- Communicating organisational messages and information to Club Officers and other Members, and other Rotary Officers.
- Facilitating conference, training seminars, meetings, and any other special event planning.
- Supporting Rotary magazines and other publications.
- Supporting The Rotary Foundation (TRF) and The Rotary Foundation United Kingdom (RFUK).
- Providing information and updates to the wider Rotary organisation concerning programmes and service projects.
- Preparing Rotary directories.
- Presenting our website and its contents and to allow you to participate in any interactive features on our website.
- For contracts for services rendered to F&DRC.
- Keeping a record of your relationship with us.
- Understanding how we can improve our services, products or information.
- In any other way we may describe when you provide the personal data.
- For any other purposes with your consent only.

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

5. How do we share your personal data with our service providers?

In the course of our legitimate Rotary business activities, there may be a need for us to share, or give access to, your personal data to other parties who provide us with services, or host our applications / software and systems. For instance and as applicable (but not necessarily limited to):

- Hosting, venue, accommodation and catering operators
- HMRC (for Gift Aid)
- Rotary International (RI)
- Rotary Great Britain & Ireland (RGI)

We will ensure that data processing agreements, compliant to GDPR, are in place before sharing with, or giving access to, your data with any third party provider(s).

6. How do we store your personal data within the Rotary organisation?

The Club may hold your information in various ways depending on your relationship with us, for instance this may include those listed in, but not necessarily limited to, the following:

- As a Partner, or a Friend, of a Member of our Club, with your consent, your personal data may be stored on the (Rotary UK) Data Management System (DMS) and Template Website System. Also, in some instances personal data may be held by individual Club Officers and Members for the purpose of specific Club activities. The DMS/Template System is synchronised with the RI 'My Rotary' when updated through the DMS (minimal data is therefor held by Rotary: see Clause 7 below). All personal data held on the DMS and Template System will be made securely within the UK or the EU by Rotary UK and their secure hosting service provider(s). You can view the relevant Privacy Policy by visiting their website here: <https://www.rotarygbi.org/>
- As a beneficiary of 'Service' that we provide to you, we may need, with your consent, to collect, process and share your personal data with third parties. We will also store and process your personal data, with your consent, for the purposes of organising and providing such 'service', and as a consequence selective personal data may be held by individual Club Officers and Members.
- As a member of the public, with your consent, your personal data may be held by individual Club Officers and/or Members for the purpose of specific Club activities.

7. How do we share personal data within the Rotary organisation?

When you give personal data to Rotary it may be shared within the wider organisation to facilitate your involvement or participation, and to provide the services afforded to you.

We will ensure that data processing agreements, compliant to GDPR, are in place before sharing your data within the wider organisation.

8. How do we share personal data with third parties?

We will never commercially sell or otherwise provide your personal data to anyone else.

We will only ever share your personal data in other circumstances, not listed above, if we have your express and informed consent at the time of collection. We may need, however, to disclose your personal data if required, to assist the Police, other agencies (for example HMRC), regulatory bodies, or our legal advisors.

9. How do we use Cookies?

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

The use of 'Cookies' facilitates websites to remember you. They're small text files that websites transfer to your computer (or phone or tablet). They make interacting with a website faster and easier: for example by automatically filling 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. This may include what type of device it is, what specific device you have, what operating system you're using, and what your device settings are. Your device manufacturer or operating system provider(s) will have more details about what personal data your device(s) make available to us.

The type and quantity of personal data 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 here: 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 to analyse the use of our websites by generating statistical and other information.

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

Google, not the Club, stores this activity information. You can view Google's Privacy Notice here: <https://policies.google.com/privacy?hl=en-GB>

To see how to opt out from Google Analytics tracking across all websites, please visit their website here: <https://tools.google.com/dlpage/gaoptout>

10. How do we keep your personal data safe and who has access to it?

We agree that there will be all reasonable and appropriate physical and technical controls in place to protect your personal data on all systems that host any of your personal data.

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

11. Where do we store your personal data?

Generally, and consciously, your personal data will be hosted securely within the UK by F&DRC, and also, as necessary, the wider Rotary organisation. This data may, however, be stored on Cloud based storage systems operated by Cloud Services Providers such as Microsoft, Apple, Google and Amazon. These providers may legitimately hold your personal data on several secure data servers (for example on back-ups) which may be based within the EU and possibly non-EU locations.

Rotary also 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, Rotary UK will take steps to make sure they provide an adequate level of protection in accordance with UK data protection law. By submitting your personal data to us you understand your personal data may be transferred, stored and processed at a location outside the EEA.

You can view RI's privacy policy by visiting their website: <https://my.rotary.org/en/privacy-policy>

12. What are RI and RGBI, and what are their Privacy Policies?

For RGBI (Rotary Great Britain and Ireland) Privacy Policy, see RGBI website:

<http://www.rotarygbi.org/privacy-policy/>

For RI (Rotary International) Privacy Policy, see RI website:

<https://www.rotary.org/en/privacy-policy>

The latest version of this F&DRC Privacy Policy is always located online at:

<https://www.rotary-ribi.org/clubs/privacy.php?ClubID=601>

This Privacy Policy, and all related documents, will be reviewed by F&DRC at the end of each Rotary year. Following appropriate advice, updated documents, if so required, will be prepared for publication within reasonable timescales. This Privacy Policy, and any documents based upon it, will be re-validated annually by signing the Rotary UK Combined Compliance Statement.

13. How long do we retain your personal data and how we keep it up to date?

We will keep your personal data only for as long as we need it to assist your involvement with F&DRC. There are statutory timescales on how long we should keep your personal data. For example: Gift Aid transactions must be retained indefinitely, financial records must be kept for seven years, and data associated with Health & Safety for three years after an event.

We shall delete any irrelevant and redundant personal data according to these statutory limits, or in accordance with any guidance issued by the Information Commissioners Office, or upon your legitimate request.

We undertake to update your personal data with any information you provide to us. If we are informed of changes to your personal data, through a third party, we will attempt to verify the changes with you before updating our records.

14. What are your rights?

The Data Protection Laws, including the Guiding Principles, and the relevant Rotary Privacy Policies, give you certain rights and these are listed below for your convenience. We confirm will only process your personal data as you would reasonably expect us to and only in connection with Rotary business.

Further clarification of your rights is available on the Information Commissioners Office website here: <https://ico.org.uk/>

- You have a right to be informed when your personal data is being collected, to what is being collected, and how it will be used and/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 storage and processing of your personal data.
- You have a right to request a copy of your personal data which we hold. This information will be provided free of charge, unless the request is found to be manifestly unfounded or excessive. If this is the case then a reasonable fee will be charged. Applications should be made in writing, by letter or email, and addressed to the Club Secretary, enclosing two qualifying proofs of identification. We will advise what proofs of identification qualify on your application.

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

- Charge a reasonable fee taking into account the administrative costs of providing the information requested.
- 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 and profiling. We can confirm we make no decisions on using your personal data in any automated process.
- You have a right in certain circumstances to personal data portability.
- You have a right to opt out of general Member, Friends and Partners mailings at any time.

In certain situations, these rights may not apply, for example:

- If you are a Club Member, we will need to communicate with you about your membership and those services afforded to you as a consequence of that membership. Further, if you hold a Club or other Rotary Office and we need to communicate with you in relation to that office. In either case you will not be able to unsubscribe from certain communications.

- If we collect and process your personal data through legitimate interests or because you have provided personal data to us to enable delivery of a service to you.

Finally, if you are unhappy with how we have processed your information, you have the right to lodge a complaint with the Information Commissioners Office, contact details below in Clause 15.

15. How do I make a complaint?

If you are unhappy with how we have processed your personal data, please contact the F&DRC Secretary using secretary@fanddrotary.club

We will register your complaint and, if possible, indicate an estimated time to make our full reply after investigations have been undertaken. We may require further details from you and conduct an interview with you possibly in the presence of our legal team.

If we fail to address your complaint to your satisfaction then you may refer the matter to:

Information Commissioners Office

Wycliffe House

Water Lane

Wilmslow

Cheshire

SK9 5AF

Helpline: 0303 123 1113 (local rate) or +44 1625 545 745

16. What accessibility do you have?

Every effort has been made to ensure that the original template pages for this site are W3C compatible (see: <https://www.w3.org/standards/>). The content of web pages on this site is, however, supplied by the Club, so such content may not be compatible.

17. Do we make changes to this Privacy Policy?

We may change this Privacy Policy from time to time. If we make any significant changes in the way we treat your personal data we will make this clear on our website or by notifying you directly depending on the extent of the relationship we have with you.

The latest version of this F&DRC Privacy Policy is always located online at:

<https://www.rotary-ribi.org/clubs/privacy.php?ClubID=601>

18. What are our contact details?

Postal address:

The Secretary

Fishponds & Downend Rotary Club

c/o The Langley Arms

Guest Avenue

Emersons Green

Bristol

BS16 7GA

Email address:

secretary@fanddrotary.club

F&DRC CDPO 01Apr20