# Rotary District 1120 Privacy Notice

Rotary District 1120 ("we") promise to respect the confidentiality of any personal data you share with us, or that we have access to through Rotary International (RI and RIBI), 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 supporters is crucial, and your personal data allows us to manage your membership and provide the support you are entitled to.

It is expected that club and district officers may also process member personal data on behalf of Rotary District 1120 and the Rotary organisation and they too will also be bound by this privacy notice.

# 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.

Updates to your personal data may be implemented by the District 1120 Web Team, but only with your expressed request/permission or that of your Club Secretary who would normally maintain your records upto-date.

### When you give it to us INDIRECTLY

Your information may be shared with us by independent organisations, for example sites like Just Giving or Eventbrite 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 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 (clubs, action groups etc.) 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:p

- Your name
- Your contact details
- 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 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 Rotary Foundation (TRF) and the Rotary Foundation United Kingdom
- Providing information and updates to district and club officers on RI, RIBI and District programmes and service projects
- Appointments to committees, club and district offices 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
- 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.

# Interact, Rotakids and under 18's data

Information that is collected from under 18s for RYLA participants, Competition entrants, Interact and Rotakids clubs will be managed through the identified Rotarian member contact and designated District Officers and will require parental consent.

# **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:

- RIBI Template database, Data Management System (DMS) and <u>rotarygbi.org</u> secure hosting service provider
- Rotary International in Great Britain and Ireland (RIBI)
- 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

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) and the RIBI Donations Trust.

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 are data processors for some of your personal information associated with your membership and will process your data in accordance with the Rotary District 1120 privacy notice. Clubs also collect personal data for their individual club 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.

When sharing lists of member data e.g. spread sheets, these will be circulated password protected.

## 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, regulatory bodies or our legal advisors.

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

#### Controls

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.

#### Use of forwarding addresses

We will not publicise personal contact details on our website or in our use of social media when advertising events. We will always use forwarding email addresses in this public area. Likewise, we expect Rotary clubs advertising events via the District website to also apply similar privacy rules.

### Communicating with clubs

It is necessary from time to time for District Officers to communicate with club officers. Where this is done via email, we will, where possible, use the DMS search & email facility which uses blind copies to protect personal email addresses. Where personal email systems are used mail will be sent blind copy.

#### **Reviews**

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

#### Reporting breaches

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 in the EU by Rotary District 1120.

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.

## 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. Under 18s information is required to be maintained for a period of 3 years after the young person turns 18 years of age. We shall delete your information according to these statutory limits.

Individual members are responsible for keeping their own personal data up to date and have access to the RIBI Data Management System (DMS) and 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 which include knowledge of collection, access, correction, and 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 reasonably 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 or by notifying you directly.

### Our contact details

Data Protection Officer- District 1120

Email: privacy@rotarysoutheast.org

If you are unhappy with how we have processed your personal information, please firstly contact the District 1120 Data Protection Officer, 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: (local rate) or 01625 545 745

Updated 16/05/2018