

***ORGANISATION - PRIVACY POLICY & DATA PROTECTION***

**The HMS Exeter Association is committed to ensuring that your personal data is processed fairly and lawfully, is accurate, is kept securely and is retained for no longer than is necessary.**

**This “Privacy Notice” sets out what data we collect, how we process it and who we may share it with and why.**

**It also explains your rights with respect to the Personal Data that we may collect from you; that is data that identifies you as an individual or from which you may be identified.**

**Why do we need this Privacy Notice?**

From the 25th May 2018 the General Data Protection Regulation (GDPR) will be applicable and the Data Protection Act 1998 (DPA) replaced by a new Act giving effect to its provisions.

GDPR requires us to ensure that personal data will be:

1. Processed fairly, lawfully and in a transparent manner.
2. Collected for specified, explicit and legitimate purposes and not further processed for other purposes incompatible with those purposes.
3. Adequate, relevant and limited to what is necessary in relation to the purposes for which data is processed.
4. Accurate and, where necessary, kept up to date.
5. Kept in a form that permits identification of Data Subjects for no longer than is necessary for the purposes for which the personal data is processed.
6. Processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures.

This Policy sets out the manner in which The HMS Exeter Association will collect process and store the personal data of its members and how we ensure that it is processed fairly and lawfully.

**Who are We and What do we do?**

The HMS Exeter Association is a FREE to join group which brings together people with a common interest in all ships named “EXETER”.

Membership is comprised of those in current service, veterans, family members and descendants from those who served on previous ships or just people who have a general interest in the shared history of these warships.

In 2016 the ship’s pennant was re-commissioned and the HMS Exeter Association (or “The Association”) formed, forging links between the established World War II HMS EXETER River Plate and Macassar Groups, with the post-war Destroyer HMS EXETER and her crews, families and associates.

The Association provides a number of online resources via its website: [Click Here](http://www.hmsexeter.com/) and Facebook page: [Click Here](www.facebook.com/ExeterAssociation).

Facebook has its own privacy policy which can be viewed: [Click Here](https://www.facebook.com/business/news/facebooks-commitment-to-data-protection-and-privacy-in-compliance-with-the-gdpr).

The Association’s administrative office is based in Devon and can be contacted by;

**Writing:** The Secretary, 9 Trumpers Close, Woodlands, Ivybridge, PL21 9XB

**Email:** [hms\_exeterassociation@hotmail.com](mailto:hms_exeterassociation@hotmail.com)

**Telephone:** 07854971949

**Who in The Association is responsible for ensuring that we meet our obligations for data protection?**

As a Not-for-Profit Organisation “The Association” is not required to register with the “Information Commissioner’s Office” (ICO) – the ICO is the Regulator in the UK for Data Protection. This however does not absolve the organisation from the responsibility to adhere to the Principles of Data Protection. The Data Protection Lead within the Organisation is the Association Secretary, ***Jessica Davis.*** She can be contacted via the methods outlined above.

**What sort of personal information could we be collecting about you and processing?**

As an organisation we collect and store some personal details that relates to your Membership, this includes your;

* + Full name and address.
  + Email contact details.
  + Telephone contact information.
  + Your areas of interest relating to the Organisation.

We may also collect some financial information relating to payment for items purchased on our website or for events that The Association organises either independently or in association with external providers.

We may additionally collect information necessary for events such as The Cenotaph Remembrance Sunday which may include;

* + Date of Birth.
  + Service Number / History / Service Connection.

You may voluntarily provide us with some of the following sensitive information;

* Medical Conditions.
* Disabilities.

Such information will only ever be used to ensure that you receive appropriate accommodation or support at events or other activities and will not be made available to anyone outside the organising committee.

**What we do with your information, how we process it and how we protect it:**

Data is held for administration and organisational purposes in a database by the following;

* The Association Secretary, the Membership Secretary and where necessary for administration purposes by the Treasurer.
* Committee members may also have access to your name and contact details for the purpose of organising events.

**Why do we need to hold and process your personal data?**

We need to hold and process data for the Association to function, examples of how your data is used are as follows;

* To send Bulletins and Newsletters or tailored Information.
* To advise you of events and meetings and to provide you with other information that the Committee feel meets the aims of The Association.
* Information you provide on your areas of interest are used to help inform the Committee on future events and activities which support The Associations Aims and Objectives and of course the desires of the Membership.
* We also provide additional interaction with you in a variety of ways. These range from the simplest examples, where people correspond on The Association social media Facebook Group.
* We may also put you in contact with other Members who have similar interests or a shared heritage.

The Association may also process personal data if at least one of the following applies;

* To process financial information for purchases, events or donations
* There is explicit consent.
* For reasons of public interest in the area of public health
* In order to protect the vital interests of an individual.
* For the establishment, exercise or defence of legal claims or whenever courts are acting in their judicial capacity
* For reasons of substantial public interest based on law, which is proportionate in the circumstances and which provides measures to safeguard the fundamental rights and the interests of the data subject.

**Do we pass or share your personal information with anyone else?**

# We will not give your information or personal details to anyone outside The Association other than those listed below without your consent, unless we are required by the law to do so.

Online payments are made through PayPal who pass only very limited information to The Association. PayPal has its own privacy policy which can be viewed: [Click Here](https://www.paypal.com/webapps/mpp/ua/privacy-full?country.x=GB&locale.x=en_GB).

Users of the PayPal Service for donations or purchases should note that some information collected may be stored on Servers located outside the European Economic Area. PayPal may collect and store the normal information required for a financial transaction shown below;

* + Full name and address.
  + Credit or Debit card details.
  + Additional information where occasionally required to prevent fraud and to protect users of the service.

MailChimp holds names and email addresses for the purposes of distributing Bulletins and our E-Newsletters. Their Privacy Policy can be found: [Click Here](https://mailchimp.com/legal/privacy/).

When organising events such as annual dinners or reunions we may be required to provide information in advance to Hotels, Restaurants etc.

We may be required to provide information to the Royal British Legion or other Service Authorities if you wish to participate in remembrance events or visits to service establishments,

The Organisations above are “Data Processors” on behalf of The Association and are subject to “Data Processing Agreements” that limit the processing of the data to that required by The Association.

**Your personal data will never be sold to any Organisation(s) and would only be passed to any additional Third Parties assisting with the aims of The Association with your express Consent.**

**How long will we retain your data?**

Some data such as records of financial transactions will be kept for seven years for audit and tax purposes.

Our principle is not to retain any data or personal information for longer than is necessary in relation to the purposes for which it was collected. We will always be driven by best practice to ensure that Information will be held in accordance with the latest guidelines and for a period not exceeding current recommendations.

**What are my rights regarding the data you hold about me?**

Under GDPR (the new regulation) you have significantly enhanced rights which include;

1. Being informed of data processing (which is covered by this Privacy Notice).
2. Accessing information (also known as a Subject Access Request (SAR)) that we hold on you. In some circumstances there can be a small charge for this.
3. Having inaccuracies corrected promptly.
4. Having information that we hold about you erased except where there is a statutory or legal requirement for us to collect process or hold it. (Right to be forgotten).
5. Restricting processing of your data except where there is a contractual, statutory or legal requirement to process it.
6. Data portability where relevant. (Unlikely for the Association)
7. Intervention in respect of automated decision making (automated decision making is not operated within The Association).
8. Withdrawing consent (see below) (Right to be forgotten)
9. Complaining to the Information Commissioner’s Office (ICO) (See below)

**Can I stop you holding and processing my data?**

**Withdrawal of Consent**

The lawful basis upon which The Association processes personal data is as follows:

* The lawful basis for holding and processing your personal data is *“legitimate interest”* this is to allow the Association to develop and flourish and of course meet its stated aims, the reason why we all join in the first place. Where we are providing a Service the basis will be to fulfill the Contract.
* Where we process data solely on the basis that you have consented to the processing, you will have the right to withdraw that consent.
* You can ask to be removed from Mailing Lists, Social Media Groups and any other form of Communication at any time.

**To exercise any of these rights you must in the first instance contact the Data Lead in writing or by email to:**

[hms\_exeterassociation@hotmail.com](mailto:hms_exeterassociation@hotmail.com)

**If you are unhappy with the way your request has been handled, you may wish to ask for a review of the Data Lead’s decision by challenging it in writing within 28 days.**

**Complaints to the ICO**

If you are not content with the outcome of the internal review, you may apply directly to the Information Commissioner for a decision. Generally, the ICO cannot make a decision unless you have exhausted our internal review procedure.

The Information Commissioner can be contacted at: The Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF