

## **BROMLEY ROTARY CLUB - Privacy Notice**

The Rotary Club of Bromley (“we”/”us”/”club”) promise to respect the confidentiality of any personal data you share with us, or that we have access to through the Data Management System (DMS), the RIBI Template System, Rotary International in Great Britain & Ireland (RIBI) (including RFUK), or Rotary International (RI) (including TRF), to keep it safe, and we will always take every effort to protect your privacy. *[For the purpose of this privacy notice, the Rotary Club of Bromley also includes the Rotary Club of Bromley Service and Charity Trust Fund, reg. No. 1018830.]*

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 donors is crucial, and your personal data allows us to manage your membership and provide the services you are entitled to.

It is expected that club members and district officers may also process member personal data on behalf of the club and the Rotary organisation and they too will also be bound by this privacy notice. RIBI (website: [www.rotarygbi.org](http://www.rotarygbi.org)) and RI (website: [www.rotary.org](http://www.rotary.org)) may also process member personal data in accordance with their privacy notices published on their respective websites.

### **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.

#### **When you give it to us INDIRECTLY**

Your information may be shared with us by independent organisations, for example sites like Golden Giving, BT MyDonate 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, WhatsApp, LinkedIn or Twitter, etc., 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 as websites (club, district, action groups etc), Companies House 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 may collect includes:

- Your name
- Your contact details (address, email and telephone number as appropriate)
- Your date of birth
- Gender
- Details of the enquiry, service or product

Where it is appropriate, we may also ask for additional information, and this will be made clear to you at the time the personal information is requested.

### **How we will use your data**

We will use your personal data for the legitimate interest of conducting core club or district activities, these will include:

- Administer your membership, or donation, including processing Gift Aid where applicable
- Provide you with the services, products or information you would reasonably expect to receive as part of your membership or enquiry
- Providing services, products, guidance or information to members for their general activities, including Disclosure and Barring Service checks
- Communicating organisational messages and information to members, district and club officers, and with their consent, non-members and Friends of the Club
- Facilitate club and district meetings, club and district training events, district conference, and other special event planning
- Supporting club and district newsletters, district magazine and 'The Rotarian' and 'Rotary' magazines
- Supporting The Rotary Foundation (TRF) and the Rotary Foundation United Kingdom (RFUK)
- Providing information and updates to club members on RI and RIBI programmes and service projects
- Preparation of Handbooks (member lists) for club, district, RIBI and RI as appropriate
- Appointments to club and district offices, committees, task forces 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 the club and within the Rotary organisation
- 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. For example, information about an individual's: race; ethnic origin; politics; religion; trade union membership; genetics; biometrics (where used for ID purposes); health; sex life; or sexual orientation.

### **Interact, Rotakids and under 18's data**

We do not collect information from under 18's without the consent of their parent/guardian. Interact and Rotakids clubs are managed through the identified Rotarian member contact.

The RIBI District Youth Exchange Association operates as a separate entity to RIBI and RI and is responsible for the organisation of Rotary youth exchange programmes. Their privacy notice is available by visiting their website: [www.youthexchange.org.uk](http://www.youthexchange.org.uk).

### **Data Sharing**

#### **1) Our service/host providers**

In the course of our legitimate club 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:

- Rotary District 1120
- Rotary International, including TRF
- Rotary International in Great Britain & Ireland, including RFUK
- RIBI Template Designer and RIBI Template Administrators
- Heart Internet – the RIBI Template database, Data Management System (DMS) and [rotarygbi.org](http://rotarygbi.org) secure hosting service provider

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 outside of the Rotary organisation.

#### **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), 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. Access is limited to those people who have a legitimate reason to access it.

On occasion, the club may collect personal data for our individual activities (such as an event requiring personal information for registration) and are therefore independent data controllers. The club may also act as a data processor for some of your personal information associated with your

membership via the RIBI Template, DMS and My Rotary. This means that we are also responsible for protecting your data under GDPR legislation whilst it is in our safekeeping and we will process your data in accordance with the privacy notices of the club, district, RIBI and RI as appropriate.

### **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 by the police, other agencies, for example HMRC, regulatory bodies or our legal advisors.

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

We will ensure that there are appropriate physical and technical controls in place to protect your personal details and we will work within good practice, for example, confidential paper records are securely stored, or securely disposed of as appropriate. The club and its members will ensure that PCs/devices holding personal information on behalf of the club are protected with appropriate anti-virus and malware protection and this will routinely be monitored by the club.

We will undertake regular reviews of who has access to information that we hold to ensure that your personal information is only accessible by appropriate members, Rotary officers, Rotary staff and our service/host providers. We will undertake comprehensive checks on the companies we use before we work with them and will ensure any contracts set out our expectations and requirements regarding how they manage the personal information they may have access to as part of providing those services.

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:**

The club may hold your information in various ways depending on your relationship with us, for instance:

- Members' personal information is stored via the DMS, RIBI Template System and My Rotary and in some instances may be held by individual club officers or members for the purpose of specific club activities.
- As a 'Friend of this Rotary Club', with your consent, your personal information may be stored on the DMS and RIBI Template System and in some instances may be held by individual club officers or members for the purpose of specific club activities.
- As a non-member of Rotary, with your consent, your personal information will be held by individual club officers or members for the purpose of specific club activities.

With the exception of 'Friends of this Rotary Club', there is a two-way synchronisation of personal information made through the DMS between the RIBI Template System and RI's My Rotary.

Your personal information held on the DMS and RIBI Template System will be held securely within the UK or the EU by Rotary International in Great Britain & Ireland and their secure hosting service provider. You can view Rotary International in Great Britain & Ireland's privacy notice by visiting their website.

However, Rotary International run 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, RIBI take steps to make sure RI provide an adequate level of protection in accordance with UK GDPR. By submitting your personal information to us you understand your personal data will be transferred, stored and processed at a location outside the EEA. You can view Rotary International's privacy notice by visiting their website.

### **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 membership, volunteering, any enquiry you make to us, donations, event registrations or other services as part of your membership, club activity or as requested by you. 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 can be retained for up to three years after an event etc. We shall delete your information according to these statutory limits, or according to guidance issued by the Information Commissioner, or guidance issued at the time the personal information is collected.

Individual members are responsible for keeping their own personal information up to date and have access to the self-service systems within the RIBI Data Management System (DMS) or My Rotary for the purpose of updating their profile. Relevant officers of this club (such as club secretary) can also assist you in keeping your information up to date. In addition, where necessary, we will also keep your information accurate and up-to-date and will regularly review this with you.

Non-members of Rotary (including 'Friends of this Rotary Club') should also keep their personal information held by the club up to date and you can do this via the club secretary.

### **Cookies**

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

Cookies mean that a website will remember you. They're small text files that sites transfer to your computer (or phone or tablet). They make interacting with a website faster and easier – for example by automatically filling your name and address in 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, including what type of device it is, what specific device you have, what operating system you're using, what your device settings are. Your device manufacturer or operating system provider will have more details about what information your device makes available to us.

The type and quantity of information 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 to [www.aboutcookies.org](http://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.

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

Google, not the Association, stores this activity information. You can view Google's privacy notice here: [www.google.com/privacypolicy](http://www.google.com/privacypolicy)

To opt out of being tracked by Google Analytics across all websites visit their website: <https://tools.google.com/dlpage/gaoptout>

### **Your rights**

The General Data Protection Regulations gives you certain rights and these are listed below for your convenience, further clarification of your rights is available on the Information Commissioners website:

- You have a right to be informed when your personal data is being collected, what is collected and how it will be used 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 processing of your personal data. Members and donors have access to their personal data via self-service systems such as the RIBI Data Management System (DMS) or My Rotary (within the Profile area). You can also request a copy of the information which we hold on you. This information will be provided free of charge, unless the request is found to be manifestly unfounded or excessive then a reasonable fee will be charged. The application should be made in writing, by letter or email, and addressed to the club, contact details shown below, enclosing two proofs of identification. Applicants should be aware that where requests are manifestly unfounded or excessive, in particular because they are repetitive, the club can:
  - charge a reasonable fee taking into account the administrative costs of providing the information;
  - or
  - 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, profiling; although we can confirm we make no decisions on you using an automated process.
- You have a right in certain circumstances to data 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 certain 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 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**

Rotary Club of Bromley

Email: [secretary@bromleyrotaryclub.org.uk](mailto:secretary@bromleyrotaryclub.org.uk)

Tel: 07580 370425

### **Complaints**

If you are unhappy with how we have processed your personal information, please firstly contact the club, 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: [0303 123 1113](tel:03031231113) (local rate) or ++44 [1625 545 745](tel:1625545745)

*Date created by the club: 25th May 2018 – v1*

*Date for review by the club: May 2019*