

# Berkshire Family History Society

## Privacy Policy

This privacy notice was last updated on 11<sup>th</sup> September 2020

### Policy Summary

**Your privacy is a top priority for the society.** We are committed to looking after your personal information in the ways that you would reasonably expect of us. You expect your details to be 100 per cent safe and secure. You expect us to handle data responsibly. You expect us to comply with UK data protection laws and regulations.

When it comes to your privacy, the society follows three key principles. These are:

- **Simple** We want to make it easy for you to understand how we use your personal data. We try to use plain words to describe our policy and processes, so that you can make informed choices;
- **Transparent** We want to be open about the personal information we ask for, why we ask for it, and how we use and process it.
- **Controllable** We want you to have control over your personal information and, should you need it, access to the data we hold about you.

Our full Privacy Policy follows. Read it if you want to find out more.

### Who we are

Berkshire Family History Society is a registered charity (England and Wales: Number 283010). Member-elected trustees and a team of volunteers — all of whom are unpaid — manage the society.

The charity has a 100 per cent owned trading arm, Berkshire Family History Enterprises Limited (Registered Number: 04733795 (England and Wales)). This policy applies to the company too.

The society is a data controller registered with the Information Commissioner's Office (ICO), as the law requires. The ICO public register records the requirements that we have for processing your personal data.

Here are our contact details:

The Centre for Heritage and Family History 2 <sup>nd</sup> Floor, Reading Central Library, Abbey Square Reading Berkshire RG1 3BQ	phone: 0118 950 9553 (during Centre opening hours)
	<a href="https://berksfhs.org">https://berksfhs.org</a> email <a href="mailto:memsec@berksfhs.org.uk">memsec@berksfhs.org.uk</a> (members) email <a href="mailto:secretary@berksfhs.org.uk">secretary@berksfhs.org.uk</a> (others)

You can contact us in person (when The Centre is open), by phone, by email, or by post.

## **Whose personal data do we hold?**

**We collect, hold, process, use, transport and store personal data of living people. We need to do this so that we can:**

- meet the charity's objectives;
- carry out day to day society tasks;
- fulfil orders for our products and services
- organise and manage bookings for our events; and
- comply with our legal obligations.

At any time, we are likely to hold some personal details that relate to:

- current and former society members;
- non-members, including those who visit the websites, who attend our meetings and events and who raise queries or complaints with us;
- our current and past volunteers, not all of whom are members, our supporters and our donors;
- current and past customers of our trading company;
- in some cases, our speakers, suppliers and contractors; and
- other people that we may contact, or who may contact us about something.

In nearly every case, individuals provide their personal data to us themselves when they first interact with the society.

## **How do we access and process your personal data?**

Most of the data is processed by our volunteers. We brief them carefully and give them training to handle your personal data securely. Most of our volunteers are experienced and have a long association with us.

Our membership secretary is responsible for collecting, processing and storing personal information relating to members.

Volunteers working for our trading company deal with orders for products, publications and some services.

Volunteers in our events team deal with bookings and other arrangements, using personal details provided by attendees.

Volunteers in our local branches use contact details that you provide to tell you about future local meetings and events. They only do this if you have first given your explicit consent that you are happy to receive news and information about our activities.

## **Why do third parties have access to your personal data?**

For some tasks, we need to share some data with third parties. One example is when we mail the society magazine to members. An outside data processor does this job for us. We also share essential data when you make a purchase or book an event online with our online payment processor. In some cases, we must also share data to meet our legal obligations – for example, with The Charity Commission and HMRC.

**The table on the next page sets out in an easy-to-read form the personal information that we hold and our reasons and basis for holding it. It also identifies where data may be shared with third parties and who those third parties are.**

## **What data do we hold and why do we hold it?**

This table explains the data held, why we hold it, and the lawful basis or bases for its use.

WHOSE DATA AND WHAT PERSONAL DATA?	WHY WE HOLD AND PROCESS THAT DATA	LAWFUL BASIS	SHARED WITH
<b>Society Members</b> ( <i>details you may supply</i> ) name, address, postcode, email address, phone number, alternative contact details; image(s), IP address, social media handle; interactions with our websites and forums current or previous occupation details, skill sets, and other competences; certain of your family history details your consents for contact, with dates  financial details – payments of fees, donations and other items by cheque, standing order, direct debit or BACS transfer	To supply all membership services and keep up to date records  To manage access to society websites To identify potential future volunteers To share with other members To permit direct marketing of the society and its activities  For administrative and accounting purposes	Consent  Legitimate interest	A  B  C
<b>Society Volunteers/Committee Members</b> Personal details as above  Details of volunteer roles and activities	To run working groups and committees effectively  To organise staffing duties and assign society tasks To manage projects and publications To manage and staff events	Consent  Legitimate interest	
<b>Other post holders</b> (named as public contacts with their agreement) Personal details as above	According to role, to provide named points of contact for members of the public	Consent  Legitimate interest	D
<b>Trustees</b> Personal details as above	To manage Trustees' legal obligations while that person remains a Trustee	Consent  Legitimate interest  Legal obligation	D  E
<b>Current and past customers</b> Names, addresses, purchase details; Offline payment details	To fulfil your orders and purchases To keep required business records	Contract  Legal obligation	A  C
<b>Branch members/supporters</b> email address and other contact details (permission to contact must be given first)	To manage advice and publicity of local activities	Consent	
<b>Gift Aid donors/former donors</b> Names and addresses Gift Aid declarations	To manage Gift Aid records and to submit annual returns to HMRC to reclaim Gift Aid on donations made	Legal obligation	A  C  F
<b>Speakers and Trainers</b> Contact details, personal biography, subjects of interest and expertise fees and expenses paid	To manage the events programme and promote it to members and the public.	Consent  Legitimate interest	C  D
<b>Other contractors</b> Details as supplied	To manage current and future contracts	Contract	C
<b>Others</b> Name and contact details and other information as supplied	To manage miscellaneous contacts, enquiries and complaints	Consent  Legitimate interest	D
<b>Members/non-members attending events</b> Name and contact details	To manage event bookings, cancellations and arrangements	Legitimate interest	A  C
<b>Event attendees</b> who tell us about a disability that we must take into account	To ensure safe access to the event for the attendee	Both are Special Category Consents	
<b>Event attendees</b> who tell us about a dietary requirement or allergy	To ensure safety of attendee at events where refreshments are served		

## **Notes**

In the table above, letters in the right hand column tell you if we might need to share some data in some cases with Third Parties (see the key below).

We share some data so that we can deliver the membership services that you expect. We share some data to fulfil your purchase orders and bookings. We also share data so that we can promote the charity's interests and activities to you, and manage its Gift Aid programme. Sometimes, we must share data to meet our legal obligations — for example, with The Charity Commission and HMRC.

- A. = Our online payment processor (Stripe) if you pay for a membership, a booking or other purchase online
- B. = Our distributor for our magazine, the *Berkshire Family Historian* (Joshua Horgan Print and Design)
- C. = Independent Examiner of Society Accounts
- D. = Members of the public
- E. = Charity Commission of England and Wales if you are a society trustee or you were one recently
- F. = HMRC if you are a donor for Gift Aid purposes

## **What does lawful basis mean in practice?**

**CONSENT** — means that you have agreed to let us process personal data that you supplied, in the form of a positive consent or disclaimer, at the time when you gave the data to us. You can change your mind on any consent at any time.

**LEGITIMATE INTEREST** — means that your evident and expressed interest in heritage and family history matters is such that we feel that we have a very good reason to use your data to keep in touch with you. We believe that this benefits you, and is something that you would expect. You have the option to opt-out if that is your wish.

**CONTRACT** — means we need to process your data in relation to a contract between us and you (for example, supplying a product or service to you).

**LEGAL OBLIGATION** — means that we have to process your personal data to comply with the law (for example, trustee records, business record keeping, and Gift Aid records if you are a donor.)

**SPECIAL CATEGORY CONSENT** — means that you have told us yourself about a particular personal requirement, probably in relation to coming to an event. For example, it might be to do with accessing a venue, or a particular dietary matter.

## **For how long do we keep and use your personal data?**

We only keep your personal data for as long as we need it to fulfil the reasons that we asked you for it. This includes any need to keep information needed for legal, accounting, or official reporting reasons.

In deciding for how long we should keep personal data, we think carefully about the detail, type and possible sensitivity of that data. We assess potential risks of harm if

your data was subject to unauthorised use or disclosure. We also think about the purposes for which we process your personal data and whether we could achieve these in any other ways. We must also observe applicable legal requirements. By law, we must keep basic information about our Shop customers' purchases for six years for tax purposes. HMRC ask us to keep Gift Aid declaration records for six years from the end of the (charity's) financial year to which they relate.

## **How do we protect your personal information?**

We adopt strict security procedures in storing and use of the personal data that you have given us. We do this to prevent unauthorised access to, and loss, misuse or alteration of your personal data. We expect anyone who processes data on our behalf to have equally strong procedures in place themselves.

We also rely on you to keep secret any confidential passwords, login or access details that you decide on, or those that we may allocate to you. While we take all reasonable steps to ensure security of your information, there is always a small risk that details sent over the internet and stored on a computer or similar device might be intercepted or accessed by an unauthorised party.

If you think that someone has accessed your personal information held by us without permission, or gained unauthorised access to your login details, you must notify us as soon as possible. You can email [webmaster@berksfhs.org.uk](mailto:webmaster@berksfhs.org.uk) to do this.

**PROTECT YOURSELF IN PUBLIC PLACES** If you share a computer or device, or use a computer in a public place like a library, we advise you always to use the browser tools to delete files and cookies and to clear your browsing history before you finish your session. You should also protect any personal passwords you use by using the browser's internet options menu. Finally, consider changing any passwords you may have used on a public computer when you get back home.

## **Your personal information and your rights**

Under UK data protection law, you have certain rights with respect to your personal data and how we use it.

**YOUR RIGHT OF ACCESS** – your right to ask us for copies of your personal information and to be reassured that it is lawfully processed. This is called a '**Subject Access Request**'.

You can make a request electronically, verbally (including by phone) or in writing. Our website has a form for electronic requests.

We will action a request received courteously and in 28 days of receiving it, unless we need to clarify anything with you first.

We reserve a right to check and confirm your identity (for example, using a passport or photographic driving licence) before releasing any personal details. (We do this to avoid any chance, however remote, of your data being misused by someone else – for example, for identity fraud.)

We do not charge a fee but do reserve the right to refuse a request if it is clearly unfounded or excessive.

Society members should direct Subject Access Requests to the Membership Secretary.

Send Subject Access Requests from non-members to the Society Secretary.

If someone else in the society receives your request, she/he will record it and forward it to the Membership Secretary or Society Secretary, as appropriate.

**YOUR RIGHT TO RECTIFICATION** — this is your right to ask us to correct personal information that you think may be inaccurate. You also have the right to ask us to complete any information that you think is incomplete.

**YOUR RIGHT TO ERASURE** — your right to ask us to erase your personal information from our live and back-up systems in specific circumstances. That means where there are no longer any essential or legal reasons for us to keep it for processing. This right is not absolute. Erasure in any particular case will depend on society circumstances, how long we are bound by law to keep your details, and the technical mechanisms available to us.

**YOUR RIGHT TO RESTRICT PROCESSING** — your right to ask us to restrict the processing of your information. This is not an absolute right, applying only in particular circumstances.

**YOUR RIGHT TO OBJECT TO PROCESSING** — your right to object to our processing of your personal data in certain circumstances.

**Specifically, you have an absolute right at any time to object to our use of your data for marketing purposes to promote the society, and its activities, products and services.**

When you join us as a member, and when you renew your annual membership, we invite you to give your direct consents for us to contact you — by email, telephone and post — (and to revise your consents at renewal time). In that way, we can keep you updated on the society's work, and on its news and activities.

You can change or revoke these consents at any time, using our website or by telling our Membership Secretary (for members) or contacting the society Secretary (non-members).

**YOUR RIGHT TO DATA PORTABILITY** — your right, in some circumstances, to ask us to transfer information that you have previously given to us back to you, or to another organisation. You have the right to receive that personal data in a structured, commonly used and machine-readable form.

## **The right to complain about how we use your personal data**

We hope that this is a right that you will never need to exercise. If you are unhappy about something that we have done that you think we should not have done, or something we have not done that you feel we should have done —

**PLEASE, let us know first. And give us a chance to put things right.**

But, whether you contact us first or not, if you have a problem, you have the right to complain to the Information Commissioner's Office if you are unhappy with how we have used your data.

Information Commissioner's Office Wycliffe House Water Lane Wilmslow Cheshire SK9 5AF	Helpline: 0303 123 1113  Email: casework@ico.org.uk
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## **Cookies**

Our websites use cookies. For more information about what cookies are, what we use them for and how you can manage them, please read our Cookies Policy.

## **Links to third party websites**

The society websites also have links to websites belonging to third parties. Those websites are not covered by this society privacy policy. If you follow a link to a third-party website from one of our websites, please ensure that you read its privacy policy. You may also want to read its Cookies policy too.

## **Changes to this policy**

The society's trustees regularly review the Privacy Policy and approve any changes to it. They may decide to update this policy at any time.

We may tell you that we have updated it in several ways — by email, if you share an email address with us, by publishing details on our website or in some other way.

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This is the latest version (11<sup>th</sup> September 2020). The Trustees of Berkshire Family History Society approved it after review of the previously published policy.