

Sussex County Association of Change Ringers

Registered Charity No. 268588

Data Privacy Policy

Key Details:

- Policy prepared by: Richard Pendlebury
- Approved by Trustees: 17 Jan 2023; version 2.0.
- Next Review Date: October 2024

Introduction

In order to operate, the Sussex County Association of Change Ringers needs to gather, store and use certain forms of information about individuals. This policy explains how these data should be collected, stored and used in order to comply with the General Data Protection Regulations (GDPR).

Consent is not required for processing data for the normal business of the Association (i.e. “legitimate interest”). This includes:

- maintaining a database of names and contact details for current members
- publishing names of members in the Annual Report,
- Publishing the name and phone number of the tower captains and correspondents in the Annual Report and on the website.
- Publishing the nominated contact email address for each tower on the website.

1. Your personal data – what is it?

Personal data relates to a living individual who can be identified from that data. Identification can be by the information alone or in conjunction with any other information in the data controller’s possession or likely to come into such possession. From the 25th May 2018, processing of personal data is governed by the General Data Protection Regulation (the “GDPR”).

2. Who are we?

The Sussex County Association of Change Ringers (“The Association”) is a charity working to the benefit of the bellringing community in the geographical area specified in our rules (www.scacr.org). For the purposes of data protection, we are a data controller (contact details below). This means we decide how your personal data is processed and for what purposes.

The Association consists of four geographical districts: North, East, South, West which each have sub-committees and separate opt-in mailing lists which are included in this policy.

The Association represents and supports local groups of ringers, ‘bands’, who are affiliated to individual churches. For the avoidance of doubt these local bands are separate and distinct entities from the Association and any data processing activities they undertake are subject to the data privacy policies of their parochial church council.

3. What personal details do we hold and how do we process it?

We aim only to collect and hold the information about you which is necessary for the purpose of running the Association. This will include, for example, your home address, phone number and email address together with the tower you ring at. This information is collected directly from you when you complete your online application form and can be viewed and maintained by you online.

We can use your personal data for the following purposes:

- To administer membership records and maintain our own accounts and records;
- To enable us to provide voluntary services for the benefit of the bellringing community in the geographical area specified in our rules;
- To fund raise and promote the interests of our charitable funds (the Bell Restoration Fund; the Sussex Young Ringers' Fund, and the Development Fund);
- To publish directories of officers, members and local tower contacts online and in our annual report & handbook;
- To inform you of news, events, activities and services provided by us;
- To organise and conduct training events;
- To analyse visitors to our website.

The Association complies with its obligations under GDPR by keeping personal data up to date; by storing and destroying it securely; by not collecting or retaining excessive amounts of data; by protecting personal data from loss, misuse, unauthorised access and disclosure and by ensuring that appropriate technical measures are in place to protect personal data.

4. What is the legal basis for processing your personal data?

We have a legitimate interest in holding and processing information about you in order to conduct the necessary activities of a territorial bell ringing association as described in the previous section.

Where we collect data that is outside of this legitimate interest, we will always request an additional optional consent.

Circumstances where we ask you to provide additional consent include:

- for the administration of young ringers' membership and carrying out our safeguarding process, we require an explicit consent of the individual under 18-years-old and their parent or guardian.
- To provide an online directory of contact details for nominated TOWER CONTACTS. If you choose to opt into the directory we will share your contact information (email, contact number and Home Tower) on our website. You should only volunteer as a tower contact if you consent to your contact details being publicly shared. An alternative tower contact address may be provided (e.g. handcrossringers@email.com).
- To join our mailing lists (e.g. North / South / East / West District lists) to receive, for example, information about upcoming events, and District / Association news.
- To gather optional demographic information including the gender and ringing ability of our members.

5. Sharing your personal data

The Association does not share the personal information of individual members with third parties for any processing unrelated to the objectives of the Association and its legitimate interest.

MemberMojo (<https://membermojo.co.uk/>) provides online membership services for the Association. In data protection terms they are a *data processor* for our membership data.

MemberMojo provides the tools and controls that help implement the Association's obligations under GDPR for managing personal member data safely and securely. Further information on how Association members' data are protected by MemberMojo; their policy and help are available on their website at <https://membermojo.co.uk/mm/help/gdpr>

In limited cases, summarised, anonymised demographic information may be provided to affiliated organisations. An affiliated organisation is one officially attached or connected to the Association such as the Central Council of Church Bellringers or the Church of England.

6. How long do we keep your personal data?

We only keep data for as long as it is necessary for the purpose for which it was collected. We will only keep membership details for currently subscribed members. Unless you tell us specifically that you no longer wish to be a member your membership will lapse three months after end of the first year in which you no longer pay your subscription fee (as defined by our rules). This means it can take up to 15 months for data on lapsed members to be removed from our records.

7. Your rights and your personal data

You have the following rights with respect to your personal data:

- The right to request a copy of your personal data that the Association holds about you;
- The right to request that the Association corrects any personal data if it is found to be inaccurate or out of date;
- The right to request your personal data is erased where it is no longer necessary for the Association to retain such data;
- The right to withdraw your consent to data processing at any time (this means you will no longer receive opt-in news/notices by email; you may no longer act as a tower correspondent (if applicable), and may no longer be a member of the Association if aged less than 18 years);
- The right to request that the data controller provide the data subject with his/her personal data and where possible, to transmit that data directly to another data controller, (known as the right to data portability);
- The right, where there is a dispute in relation to the accuracy or processing of your personal data, to request a restriction is placed on further processing;
- The right to object to the processing of personal data by the Association (this means you may no longer be a member of the Association);
- The right to lodge a complaint with the Information Commissioners Office.

8. Further processing

If we wish to use your personal data for a new purpose, not covered by this Data Privacy Notice, then we will provide you with a new notice explaining this new use prior to commencing the processing and setting out the relevant purposes and processing conditions. Where and whenever necessary, we will seek your prior consent to the new processing.

9. Contact Details

To exercise all relevant rights, queries or complaints please in the first instance contact the General Secretary of the Association (secretary@scacr.org).

You can contact the Information Commissioners Office on 0303 123 1113 or via email

<https://ico.org.uk/global/contact-us/email/> or at the Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire. SK9 5AF.

10. Website and Cookies

When someone visits our website, we use a third-party service to collect standard internet log information and details of visitor behaviour patterns. We do this to find out things such as the number of visitors to the various parts of the site. This information is only processed in a way which does not identify anyone. We do not make, and do not allow third parties to make, any attempt to find out the identities of those visiting our website. If we do want to collect personally identifiable information through our website, we will be upfront about this. We will make it clear when we collect personal information and will explain what we intend to do with it.

Use of cookies

Cookies are small files that are downloaded to your browser automatically when you visit our website.

Cookie files are stored by your browser and contain information that may be used for the purpose of gathering information about your device and your use of the website. Such information will not identify you personally; it is statistical data about our visitors and their use of our site and general internet use. The Association has no direct control over the information that is collected by means of these cookies, but we may use the data collected by third parties to analyse how visitors interact with the website so that we can continue to develop and improve our services.

You may wish to restrict the use of cookies, or completely prevent them from being set. Most browsers provide for ways to control cookie behaviour such as the length of time they are stored – either through built-in functionality or by utilising third party plugins.

It is important to note that restricting or disabling the use of cookies may limit the functionality of our websites or prevent them from working correctly at all. To find out more on how to manage and delete cookies, visit www.aboutcookies.org.

Third party links

You might find links to third party websites on our website. These websites should have their own privacy policies which we recommend you familiarise yourself with. We do not accept any responsibility or liability for these policies whatsoever as we have no control over them.