



# **Chiswick Memorial Club Privacy Policy and Promise**

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At The Chiswick Memorial Club we believe in being open and up front with individuals about how we use their personal data, and so we have developed our Privacy Promise: a quick and simple summary explaining how we use and look after your information.

## **Our Privacy Promise**

The Chiswick Memorial Club takes your privacy very seriously, and we want to assure you that your personal information is safe with us and we will never sell your details. Our privacy promise covers how we treat your data and put you in control of what happens to it.

## **We will protect your data**

- We will never sell your data to third party organisations.
- We will collect and use your personal information only if we have your permission, or we have justified business reasons for doing so, such as collecting enough information to manage memberships.
- We will be clear at the point when we collect your information about how we will use it, and whom we might share it with.
- We will use your personal information within the appropriate lawful basis for which it was collected, and we will make sure we delete it securely once we no longer need it.

## **You are in charge**

We will contact you with your permission via methods of communication you have consented to, or where we have a legitimate interest to do so.

As a member of The Chiswick Memorial Club, you can contact our Chairman, any time you wish, to change the way we contact you, including opting in to, or out of, future communications.

## **We are respectful**

We will not put undue pressure on you to renew your membership, and if you do not wish to renew we will respect your decision.

## **We are accountable**

We do all we can to make sure we comply with this privacy promise.

## **We keep in touch**

We will always provide easy ways for you to contact us, and our Chairman is on hand to help answer any queries you may have about your data.

If you are unhappy with anything we've done in relation to your data, please contact the Chairman and we will look in to what's happened straight away.

We have protocols in place to ensure your data protection, but in the event of a mistake, we will follow strict procedures to keep you informed and put things right.

If you have any questions please contact our Chairman via email: [info@chiswickmemorialclub.org](mailto:info@chiswickmemorialclub.org)

## Privacy Policy

The Chiswick Memorial Club takes the privacy of our, members and staff very seriously, and we are committed to protecting your privacy. This policy tells you how we collect your personal information, how we store it, how we use it and what your rights are in relation to your personal information.

This policy describes how The Chiswick Memorial Club collects and uses personal information the terms of this policy may change to reflect our practices in what we do with your information. If we make significant changes to our Privacy Policy, we will highlight that there has been a change on our communications for a discretionary period of time.

If you have any queries about this policy please contact:

The Chairman: [info@chiswickmemorialclub.org](mailto:info@chiswickmemorialclub.org)

## How we collect personal data

The Chiswick Memorial Club is the “data controller” of the personal information you provide to us, and we will determine and tell you about the purpose for which we are collecting your information and how we will use it. We collect your personal information in two ways:

- When you provide it to us directly via Membership Application
- When you complete a hire agreement form for one of our facilities

## What personal data do we collect?

The personal data we collect will include name, date of birth, email address, postal address, telephone numbers your proposer, and seconder, occupation.

## How do we use this information?

We will use your personal information for one or more of the following purposes:

- Administering membership records;
- Contacting you to promote our products and services.
- For Administrative purposes.

If you do not wish your data to be used in any of the ways listed above, or have questions about this, then contact the Chairman. Email: [info@chiswickmemorialclub.org](mailto:info@chiswickmemorialclub.org)

## Our supporter services

If you contact our Chairman, you may choose to provide details of a personal nature to him.

If you telephone our Chairman, your call will not be recorded

Only The Chiswick Memorial Club will receive your personal information, and it will only be used for the purposes of dealing with your Membership or evaluating the services we provide. The Chiswick Memorial Club will not pass on your details to anyone else without your consent; except in exceptional circumstances such as to comply with the law. Examples of this might include people contacting the service reporting abuse, anyone reporting serious self-harm, anyone expressing the intention of harming someone else, or any matter regarding national security.

Your personal information and details of the enquiries received are stored on a secure database. If for any reason you wish to have your personal details amended or removed, please contact the Chairman details are below.

## Your choices

You have a choice about whether you want to receive information about our progress, fundraising activities, and membership. We will not use your personal information for marketing purposes if you have indicated that you do not wish to be contacted. You can change your preferences (such as email, phone, text or post at any time), by contacting:

The Chairman

Email: [info@chiswickmemorialclub.org](mailto:info@chiswickmemorialclub.org)

## The lawful basis we use to process your data

We will process your personal data under one or more of the following lawful bases:

- You have given us clear consent;
- You have entered into a contract with us;
- We have a genuine and legitimate reason and we are not harming any of your rights and interests.

## Consent

Where we ask for your consent to process your personal information, we will use clear plain language so you can fully understand what you are consenting to. We will tell you what we will be doing with the information, and explain your right to withdraw consent and how you can do that. We will only use your personal information you have provided for the purpose we have gained your consent for. We may also ask you to confirm that you still consent where a considerable period of time has lapsed since you last had any contact with The Chiswick Memorial Club

## Legitimate Interests

We may process your personal data where we have a genuine and legitimate reason to do so, and we are not harming any of your rights and interests. Our legitimate interests will be in providing, fundraising, organising events and campaigning for membership renewal

This means that we may use your personal data for direct marketing, fraud prevention, network and information security, crime prevention/detection and analytics so that we can improve our services to give you the most appropriate information and ensure our fundraising Membership campaigns are effective.

Our legitimate interests are:

- Direct Marketing: We will send postal, email, TEXT marketing for fundraising and Membership renewals, which further the aims and objectives of Chiswick Memorial Club. We will also make sure our postal and email marketing is relevant for you, tailored to your interests.
- Personalisation: Where the processing enables us to enhance, modify, personalise or otherwise improve our services/communications for the benefit of our business.
- Due Diligence: We may need to conduct investigations on members, potential customers and business partners to determine if those companies and individuals have been involved or convicted of offences such as fraud, bribery and corruption.

## Your interests

We will process your personal data for our legitimate interests in a way we consider you would reasonably expect, to be proportionate and with minimal impact on your privacy. We will carry out assessments to ensure that we consider whether the processing is necessary and by balancing it out with your rights and freedoms.

You have a right to object to your personal data being processed under legitimate interests if you do not consider we have compelling legitimate grounds for the processing. Please see the section *Your Rights* for more information.

## Your rights

Under the General Data Protection Regulations (GDPR) you have the following rights:

- Transparency over how we use your personal information (right to be informed);
- Request a copy of the information we hold about you, which will be provided to you within one month (right of access);
- Update or amend the information we hold about you if it is wrong (right of rectification);
- Ask us to stop using your information (right to restrict processing);
- Ask us to remove your personal information from our records (right to be 'forgotten');
- Object to the processing of your information for marketing purposes (right to object);
- Obtain and reuse your personal data for your own purposes (right to data portability);

If you would like to know more about your rights under the GDPR see the Information Commissioners Office website. If you would like to make a request for any of the above actions, please submit your request to:

**The Chairman**

Email: [info@chiswickmemorialclub.org](mailto:info@chiswickmemorialclub.org)

## **Rights of access**

You have the right to see what personal data we hold about you. We would ask that you submit your request for access to your personal data in writing.

To obtain a copy of the personal information we hold about you, please write to the Chairman  
Afton House Bourne Place Chiswick W4 2EL

## **Transfer of Information Outside of the EEA**

This Chiswick Memorial Club does not conduct business or transfer any details outside of the EEA

## **Children's Data**

We would not hold any details of persons under the age of 18 years

We do not have activities or events for those under 18 years so we may ask for proof of your age. Before allowing you to be served

Please note that we will not knowingly accept orders for goods from persons aged under 18 years.

For our raffle and gaming products, due to Gambling Commission regulations, we cannot allow people under the age of 18 years to take part.

## **How we protect personal information**

We take appropriate measures to ensure that the personal data disclosed to us is kept secure, accurate, and up to date.

We ensure that there are appropriate technical controls in place to protect your personal details..

We undertake regular reviews of who has access to information that we hold to ensure that your information is only accessible by the chairman

We do not use external companies to collect or process personal data on our behalf.

We may need to disclose your details if required to the police, regulatory bodies or legal advisors.

We will only ever share your data in other circumstances if we have your explicit and informed consent.

## **How long will we keep your personal data?**

We will ensure that your personal data is kept only for so long as is necessary for the purpose for which it was collected, and is securely destroyed in accordance with our retention schedule below.

Where possible we will inform you of how long we will retain the personal data you are providing to us.

We will hold your data for as long as you are a Member of The Chiswick Memorial Club. Once you become lapsed from Membership of The Chiswick Memorial Club we will hold your details for six months giving you time to re-join.

When you complete a hire agreement form for one of our facilities we will keep your details for a period of one Month after the function date.

## **Will we disclose the information we collect to outside parties?**

We do not share or sell members details with other third parties.

We will only disclose data when obliged to disclose personal data by law, or the disclosure is 'necessary' for purposes of national security, taxation and criminal investigation, or we have your consent.

## **Use of Mobile Phone Data**

The Chiswick Memorial Club values your Membership. We would like to keep you up to date with information regarding New Memberships and Renewals via your mobile phone and also by writing to you. If you have given us your phone number we will retain a copy of your mobile phone number, together with any other personal details you have given us, such as your name and address.

If you would prefer us **not** to contact you by phone, or if you would prefer us **not** to contact you by mail you may email us at [info@chiswickmemorialclub.org](mailto:info@chiswickmemorialclub.org)

## CCTV Privacy notice

This notice sets out how **Chiswick Memorial Club Afton House Bourne Place Chiswick W4 2EL** uses your personal information which may be recorded on our CCTV system. This notice explains how we comply with the law on data protection and what your rights are and for the purposes of data protection laws we will be the controller of any of your personal information recorded on our CCTV system.

We have not appointed a Data Protection Officer to oversee our compliance with data protection laws as we are not required to do so, but our Chairman has overall responsibility for data protection compliance in our organisation. Contact details are set out in the “**Contacting us**” section at the end of this privacy notice.

### 1. What information may we hold / process that will relate to you?

We may collect from you video recordings and still pictures which feature you if you are in the field of vision of any of our CCTV system. This personal information may include your activities, your face, and other visual information about you which is recorded on our CCTV system.

We may also collect personal information about you if you, your representative or a person authorised by you contacts us regarding an enquiry, complaint or other communication.

### 2. What do we do with your personal information?

As the data controller we will collect personal information on our CCTV system and use it for the following purposes:

- For the prevention and detection of crime
- For evidence in any civil or criminal legal proceedings
- To assist in investigations
- For safety and security
- Dealing with any queries, complaints or enquiries
- Retaining records

As well as being the purposes for which we use your personal information, all of the above are also legitimate reasons for us to use and store personal information relating to you which is captured on our CCTV system and legitimate interests is our legal basis for processing your personal information.

We may anonymise any of the personal information we hold on our CCTV system (so that it does not directly identify you, for example by obscuring your face) and it therefore ceases to be your personal information. We may use this anonymised information for any other purposes.

### 3. Who we share your personal information with

We share your personal information with the following parties:

- **The police and other law enforcement agencies:** to carry out policing, assist investigations, trace missing people and investigate alleged criminal activities.
- **People who have been injured, attacked or had property damaged or stolen and their insurance providers:** to assist them with any criminal or civil investigations or legal proceedings.
- **Private and other investigators:** to aid their investigations.
- **Any relevant regulators:** where we are required to do so by law or to assist with their investigations or initiatives, and this includes but is not limited to the Information Commissioner's Office.

We do not disclose personal information to anyone else except as set out above unless we have your consent or we are legally obliged to do so. We do not sell your data.

### 4. Transferring your personal information internationally

The personal information we collect about you is not transferred to or stored in countries outside of the UK or European Union.

### 5. How long do we keep your personal information for

We will keep your personal information for up to approximately 30 days after the recording was made. After this time the recording stored on the hard drive of our CCTV system will usually be overwritten. However if we receive an enquiry about a particular recording on our CCTV we will generally then retain that part of the recording until it is no longer required. This period can vary as it will depend upon the circumstances of the particular case, but for criminal or civil legal proceedings this could mean that the personal information is retained until after the legal case and any appeals have been concluded, which may be many years. As soon as it is no longer required we will then delete the personal information.

## Your rights in relation to your personal information

You have the following rights in relation to your personal information:

- the right to be informed about how your personal information is being used;
- the right to access the personal information we hold about you;
- the right to request the correction of inaccurate personal information we hold about you;
- the right to request the erasure of your personal information in certain limited circumstances;
- the right to restrict processing of your personal information where certain requirements are met;
- the right to object to the processing of your personal information;
- the right to request that we transfer elements of your data either to you or another service provider; and
- the right to object to certain automated decision making processes using your personal information.

You should note that some of these rights may not always apply as they have specific requirements and exemptions which apply to them and they may not apply to personal information recorded and stored in our CCTV system and also other of these rights will not be relevant to personal information stored in a CCTV system.

There is no legal, contractual or other requirement or obligation for you to provide our CCTV system with your personal information.

More information about your legal rights can be found on the Information Commissioner's website at <https://ico.org.uk/for-the-public/>.

To exercise any of the above rights, or if you have any questions relating to your rights, please contact us by using the details set out in the "**Contacting us**" section below.

If you are unhappy with the way we are using your personal information you can also complain to the UK Information Commissioner's Office or your local data protection regulator in the European Union if you are based outside the UK or bring a claim in the courts. However we are here to help and would encourage you to contact us to resolve your complaint first.

### 6. Changes to this notice

We may update this privacy notice from time to time. You are encouraged to regularly check for any updated version of this privacy notice.

### 7. Contacting us

In the event of any query or complaint in connection with the personal information we hold about you or if you would like more information about or to exercise your rights, you can contact our Chairman please email [info@chiswickmemorialclub.org](mailto:info@chiswickmemorialclub.org)

## Personal changes

If your personal details change, please help us to keep your information up to date by notifying us

If you are member and wish to update us of your information please contact us at the address below:

The Chairman Afton House, Bourne place, Chiswick W4 2EL. Or email [info@chiswickmemorialclub.org](mailto:info@chiswickmemorialclub.org)

We may change the terms of this privacy policy from time to time. If we do so, we will list the changes on our notice board, as part of an audit trail. By continuing to remain a member of The Chiswick Memorial Club you will be deemed to have accepted such changes.

## Data Protection Regulator

Further information and advice about data protection law and compliance is available from:

Information Commissioners Office Wycliffe House Water Lane Wilmslow Cheshire SK9 5AF Tel: +44 (0) 01625 545 745

Website: [www.ico.org.uk](http://www.ico.org.uk)