

THE OLD BRADFORDIANS CLUB

(LONDON) LIMITED

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General Data Protection Regulations - Privacy Notice

16th May 2018

1) Background to the General Data Protection Regulations

The General Data Protection Regulations (GDPR) are a 2016 European Directive, which come into effect throughout the European Union (EU) on the 25th May 2018. The directive will continue to apply in the UK, even after this country leaves the EU in March 2019, in the guise of a Data Protection Act, currently (May 2018) going through Parliament.

Under existing data protection legislation, the Old Bradfordians Club (London) Ltd - hereafter referred to as the London Club - is exempt from registration with the Information Commissioner's Office (ICO) as a data processor, because it only processes members' personal data for internal communications: this will not change under the GDPR. However, following a request for guidance, the ICO has advised that the London Club – like many other small social and community organisations – has to comply with the provisions of GDPR.

The GDPR require any organisation, public or private, that processes Personally Identifiable Information (commonly referred to as personal data) to issue a "Privacy Notice" to the people whose personal data it holds: the notice has to contain several key pieces of information:

- responsibility for your personal data;
- your rights under GDPR;
- the personal data processed;
- uses of your personal data (including sensitive data);
- storage of your personal data;
- sharing your personal data;
- complaints about processing your personal data.

More detailed explanations can be found on the website of the UK data regulator - the Information Commissioner's Office (ICO) at www.ico.org.uk

Other Directors: M.D. Champkin, M.B. d'Arcy, C. Hirst, N. Levin, L. Ogden, A. Puri, H. Rawson

Registered Office: 112-114 Witton Street, Northwich, Cheshire, CW9 5NW. Registered in England and Wales. Registered No: 126320

2) Responsibility for your personal data

The London Club is responsible for your personal data. The London Club is registered in England & Wales under company number 126320. It is the data controller of the personal data collected from you, and as such controls the ways personal data are collected, and the purposes for which personal data are processed (i.e. held and used). Our registered address is –

Old Bradfordians Club (London) Ltd
c/o Burton Beavan
112 - 114 Witton Street
Northwich
Cheshire
CW9 5NW

3) Your rights

Set out below are the eight rights enshrined in the GDPR, which you are entitled to exercise in relation to your personal data. The three marked with an asterisk are unlikely to apply to the London Club:

- the Right to be Informed (to know what personal data is held about you and how it was obtained);
- the Right to Access (to get a copy);
- the Right to Rectification (to have any errors or out of date data amended);
- the Right to Erasure (to have any time-sensitive data erased)*;
- the Right to Restrict Processing (to limit the use of personal data - e.g. to restrict contact details published in a members' list, or object to sharing personal data with a 3rd party);
- the Right to Portability* (to be able to transfer personal data to another provider - as with changing a mobile 'phone contract);
- the Right to Object (to have data removed which is not required for data processing);
- Rights relating to Automated Decision Making and Profiling* (to challenge the use of personal data to predict spending or voting habits etc - c.f. recent scandal involving Facebook and Cambridge Analytica;

You can object to the London Club's use of your personal data where we rely on Legitimate Interests as the justification for processing your data.

To raise any objections or to exercise any of your rights about the London Club's use of your personal data you can send an e-mail to Mark Lawrence (London Club Vice-President) at jrmlawrence@hotmail.com .

If you get in touch, we will come back to you as soon as possible, hopefully within one month. However, if your request is complicated, it may take a little longer, but we will aim to come back to you within 2 months of your request. Please bear in mind that none of the London Club office holders are employed full-time on Club business, nor are there any other full-time employees of the Club to handle complaints or requests for copies of personal data. There is no charge for requests. We may ask you to verify your identity before we provide any information to you.

If the London Club decides to change this privacy notice, the changes will be circulated to you by e-mail or by post if there is no e-mail address.

4. The personal data which the London Club processes

Types of personal data

- forename(s) and surname;
- address;
- telephone number(s);
- e-mail addresses(s);
- BGS School years;
- occupation/job title;
- date of joining the London Club.

Source of personal data

The only personal data held by the London Club is that provided by members at the time of joining the Club, or notified by them during the course of their membership. We do not undertake “data mining” (i.e. searching the internet, or accessing public records), purchase mailing lists, or obtain personal data from 3rd parties.

Sensitive personal data

The London Club does not hold any sensitive personal data: the following are examples given by the GDPR -

- racial or ethnic origin;
- political opinion or affiliation;
- religious or political beliefs;
- trade union membership;
- biometric, health or medical data;
- sexual orientation.

5. How the London Club uses your personal data

We can only process your personal data if we have a lawful reason for doing so. According to the General Data Protection Regulations (GDPR) we can only use your personal data for one or more of the following reasons: Consent, Contractual Necessity, Legal Obligation, Legitimate Interests, Public Interest, and Vital Interests.

The London Club processes personal data to comply with the Companies Act 2006, (**Legal Obligation**), as the London Club is a private company limited by guarantee, and to fulfil the requirements of the Articles of Association and its objects, as set out in Article 3 - Objects of the Company (**Legitimate Interests**), which are the reasons why the London Club exists and why you joined it. The objects are unchanged from when the Club was founded in 1896 and incorporated in 1913. The Club’s purpose is essentially to offer a social forum for Old Bradfordians in London and the SE of England, and to provide assistance to the School, and to current and former pupils. The Club will not use your data for any purposes beyond fulfilling the Club’s objectives.

This a comprehensive, but by no means exclusive, list of the uses to which personal data is or could be put:

Maintenance of Register of Members (Legal Obligation)

- a Register of Members is compiled as a Legal Obligation under the Companies Act (this is open to inspection by members under Companies Act rules, aside from GDPR, on application to the Club Secretary);

Notifications to all Club members (Legal Obligation)

- Annual/Extraordinary General Meeting (AGM/EGM) notices, agenda and minutes;
- copy of annual Club accounts and President's report;

Notifications to all Club members (Legitimate Interests)

- annual and monthly dinners;
- networking and social events;
- sporting events involving current or former pupils;
- adverts for offers of internship, employment & career development opportunities offered by OB to current BGS pupils and OBs;
- requests for assistance to current BGS pupils and to OBs (e.g. finding accommodation/ internships/ employment etc);
- personalia (e.g. Births Marriages and Deaths, retirement, honours and achievements etc) as notified by members concerned, their families, or already in the public domain;
- a members' list;
- sporting events, plays, TV programmes, films, book launches, cultural events etc. involving current BGS pupils and OBs, or connected with the School/Bradford/Yorkshire;
- requests and offers for OBs to contact other OBs if visiting a country/region/city;
- contact details passed to Bradford Grammar School alumni office (but not for fundraising);
- matters of interest about the School/Bradford/Yorkshire;
- offers from other school alumni associations to make use of their facilities or attend their events;

Notifications to Committee members (Legal Obligation)

- Committee meeting notices, agenda and minutes;
- Drummond Trust award applications, agenda and minutes.

6. Storage of your personal data

Duration of storage

The London Club retains your personal data for the duration of your membership, and up to 12 months after your membership ceases (see Article 24 (1) - (3) for the circumstances of membership termination). This additional retention period arises out of the legal obligation each member has on joining the London Club, to contribute £1 in the event of the Club ever being wound up and declared insolvent: the obligation continues for a further 12 months after the termination of membership.

Method of storing and protecting your personal data

London Club members' personal data is currently stored by the Honorary Membership Secretary on password-protected laptop computers and on a password-protected USB stick.

7. Sharing your personal data

Sharing Club members' personal data with 3rd parties

- Names of London Club members provided to social event locations to facilitate admission (e.g. the Carlton Club, the Union Jack Club, and other occasional venues);

Sharing office holders' personal data with 3rd parties

- annual notification of names, date of birth and address to Companies House as required by the Companies Act;

The London Club does not share any personal data with any advertisers or data analytics companies.

8. Complaints about processing your personal data

If you have any complaints concerning the London Club's processing of your personal data, please e-mail Mark Lawrence (London Club Vice-President) at jrmlawrence@hotmail.com

If you think a breach of data protection laws might have occurred, you have the right to lodge a complaint with Information Commissioner's Office (ICO - the UK data protection regulator), which is responsible for the protection of personal data in this country.

You can contact the Information Commissioner's Office (ICO -) by telephoning 0303 123 1113 or through the ICO website: www.ico.org.uk

Mark Lawrence
Vice-President
Old Bradfordians Club (London) Limited