



The Leicestershire and Rutland Family History Society

Registered Charity No 518870

Privacy Notice

Policy statement: (as at 12 June 2019)

The Leicestershire and Rutland Family History Society (LRFHS) respects your privacy and is committed to protecting your personal data. This Privacy Notice will inform you about how we look after your personal data and will tell you about your privacy rights and how the law protects you.

This Privacy Notice aims to give you information on how the LRFHS collects and processes your personal data using our website, including any data you may provide through our website when you subscribe to the Society, access our services and/or purchase a product or service.

We do not knowingly collect data relating to children.

It is important that you read this Privacy Notice, together with our cookie policy, and any other privacy notice or fair processing notice that we may provide on specific occasions when we are collecting or processing personal data about you, so that you are fully aware of how and why we are using your data.

Legal Basis:

Under the General Data Protection Regulations (GDPR), the Society is obliged to declare the *legal basis* for its processing of Personal Identifiable Data (PID).

It has been determined that the *legal basis* for most of the Society's data processing will be "*legitimate interests*", except where there arises the necessity to send out PID relating to members of the Society who are domiciled outside of the European Union (EU), in which case *granular consent* will be sought. Also, as it is customary for the Society's journal to be sent to both UK and Overseas members, *granular consent* will be sought in respect of all new members, and members who are in the process of renewing membership as part of the signing up process.

(**Consent** is one of the six lawful bases that justify the processing of personal data. To be adequate, **consent** must be a freely given, specific, informed and unambiguous indication of the individual's wishes by a statement or clear affirmative action – **granular** is the word the regulators use.

Purpose/Legitimate Interests:

Under the GDPR, the Society is obliged to declare the purpose of its data processing. The LRFHS has determined that the purpose of the processing, and therefore the “*legitimate interest*” is to *‘facilitate the delivery of the Society’s journal, and other services/correspondence to its members and the transaction of business with others whom it from time to time may interact’*.

Responsible Persons:

For the purposes of the GDPR, there are joint Data Controllers within our Society. They are the Chairman of the Society and the Membership Secretary. The Data Processors are the Membership Secretary and the Surnames’ Interests Secretary. Their contact details can be found on the Society’s website and within the Society’s quarterly journals.

Data Subject’s Rights:

Under the GDPR, an individual (the data subject), has the following rights:

The right to be informed

The right of access

The right to rectification

The right to erasure

The right to restrict data processing

The right to data portability

The right to object

Rights in relation to automated decision making and profiling

Membership database:

Our membership database is held on a secure computer, password protected and includes contact information which you have provided yourself to the Society, name, postal address, e-mail and class of membership, together with details of how you have paid your subscription.

If a member ceases to be a member for whatever reason, then their personal data will be archived, on a secure server, for historical and lawful reference purposes. It is not processed again unless that person re-joins the Society.

None of the data held by the Society, is shared with or sold to any other third parties, and we do not keep any information about your racial or ethnic origins, political opinions, religious beliefs, physical or mental health, sexual preferences or convictions by any courts.

Access to Personal Information:

The LRFHS believes in being as open as we can be in terms of giving people access to their personal information. Under the GDPR, individuals can ascertain if we hold personal information about themselves by making a written “subject access request” to the Society.

If we are holding any information about you, we are obliged to:

Give you a description of what information we hold

Tell you why we are holding it

Tell you who it could be disclosed to and

Let you have a copy of the information we have in an intelligible format.

Any request for a statement of any personal information we may hold about you, should be made in writing, addressed to either the Chairman or the Membership Secretary at their Society addresses.

No fee will be charged for you to access your personal data (or to exercise any of your other rights). However, we reserve the right to charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

We will endeavour to respond to any requests made within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made several requests. In these cases, we will always notify you and keep you informed and updated.

Our website:

When you visit our website, we use cookies to assist us to operate the site more efficiently. Please see our separate Cookie policy for further information.

Security:

We use third party services to help maintain the security and performance of the website. However, no one is identified during this processing.

Social Media:

The Society uses third party providers, Facebook, and Twitter to manage some of our social media interactions.

Private or Direct messages we receive via the social media will be stored by Facebook or Twitter under their own Terms and Conditions. They will not be shared with any other social media platforms that we may use.

Disclosure:

Members' contact details will be held by the Society under its Terms and Conditions and 'legitimate interests' and will not be shared with any third party, except where we have to provide our services to you under our 'legitimate interests', or where we are required to do so by law.

Surnames' Interests Contact request:

Where a member, as the result of having seen a Surnames' interests posting in the Society's journal, is desirous of contacting a member, if the enquirer lives outside of the EU, then his/her contact details would be forwarded to the member to allow said member the opportunity of making first contact with the enquirer.

Members are referred to by their member's number only in the Society's journal - contact details are not disclosed on the website. Thus, the member's privacy is upheld and the right of the member to make contact only if he/she wishes to do so is preserved.

Persons who use LRFHS services:

The LRFHS offers services to members and the public. We use a third party, PayPal, for membership joining/renewals online, and for sales of our Cd's. Such third parties are only allowed to use the personal information collected by them to process sales and online membership applications/subscriptions renewals. We do not control these third-party websites and we are not responsible for their privacy statements. When you leave our website and visit other sites, we encourage you to always read their privacy statements.

Disclosure of your Personal Data

For the LRFHS to carry out the purposes set out in this policy, we may have to share your personal data with the following parties:

Service providers acting as processors based in the UK who provide administration services for us, i.e.: our journal printing contractor. This data is sent via encrypted e-mail.

HM Revenue and Customs, regulators and other lawful authorities acting as processors or joint controllers based in the UK who require reporting of processing activities in certain circumstances.

We require all third parties to respect the security of your personal data and to treat it in accordance with the relevant law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

Data Security:

We have put into place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those officers, Society trustees, agents and other third parties, who have a need to know. They will only process your personal data on our instructions, and they are subject to a duty of confidentiality,

We have put into place procedures to deal with any suspected personal data breach and we will notify you and any applicable regulator of a breach where we are legally required to do so.

What we may need from you:

At times we may need to request from you specific information to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that your personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask for further information in relation to your request to speed up our response.

Complaints:

The LRFHS strives to meet the highest standards when collecting and using personal information. For this reason, we take any complaints we receive about this very seriously. We therefore encourage people to bring it to our attention if they think that our collection or use of information is unfair, misleading or inappropriate.

Complaints should be made in writing and addressed to the Chair in the first instance at the address shown in the Society's journal or on the website, as shown below:

The Chairman

LRFHS,

Rutland Suite, 2nd Floor,

7-9 Every Street,

Leicester.

LE1 6BF

All information relating to a complaint will be retained by the Society for two years from closure. It will be retained by the Society in a secure environment and access to it will be restricted in line with the principle of "need to know".

You are also at liberty to make a complaint to the supervising authority which is:

The Information Commissioner's Office

Wycliffe House

Water Lane

Cheshire.

SK9 5AF

By telephone on 03031231113 or <https://ico.org.uk/make-a-complaint/>

Queries:

This Privacy Notice has been written with clarity and brevity in mind. It does not provide exhaustive details of all aspects of the collection and use of personal information by the LRFHS. For more detailed information please contact the Chairman at the address as shown in the journal or on the website. Information can also be obtained from the ICO itself at their address.