

PRIVACY POLICY - OLD HARLOVIANS CLUB

This Privacy Policy sets out how OH (the Old Harlovians Club) uses and protects any information that you may give us.

OH is committed to ensure that your information and privacy are protected. If we ask you to provide certain details by which you could be identified, then we will only use that information in accordance with this privacy statement.

OH may change this policy to take account of any new data protection legislation. We would advise you to check our website (www.oldharlovians.co.uk) occasionally to ensure that you are content with any changes made

The Data Controller is:-Old Harlovians Club, Greendale, Burford, Tenbury Wells, Worcs, WR15 8HW

The information that you provide will be held under the terms of the Data Protection Act 1988 and may be used by the OH to supply member's services.

Information we collect

We may collect the following information:

**Name, address and post code, years attended school and House
Contact information including email address, telephone numbers and
photographs (from which an individual can be identified)**

This Information may be held on computer, memory stick and paper records.

We require this information to keep internal records of membership, to enable OH to contact you and provide services you are entitled to as a member of OH, to understand your needs and preferences in how we contact you, and to give a better service

We may periodically send out paper and electronic newsletters and information that we think that members will find interesting.

Storage of Personal Data

By supplying your personal data, you agree that we can transfer, process and store your personal data. We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this privacy policy. All information that you provide us with is stored in a secure environment. We will use strict procedures and security features to try to prevent unauthorised access. We will not share your data with any other person or organization, other than material that is published on our website.

Information requests

You may request details of personal information that we hold about you under the Data Protection Act 1998. If you would like a copy of the information held on you, please write to us at the address above or make a request via the contact page on our website. If you believe that any information we are holding on you is incorrect or incomplete, please write to or email us as soon as possible. We will correct any information found to be incorrect.

Contact us

Questions, comments and requests regarding this privacy policy are welcomed and should be addressed to us either by email – to the secretary at mandsdyke@btinternet.com or the web master at web@oldharlovians.co.uk - or write to the Data Controller at the above address.

Basis for OH working with personal data - “Legitimate Interest Rules”

OH is proceeding along the lines of processing or using personal data without consent. We are allowed in some circumstances to use an individual's personal data without gaining their consent to do this.

There are five other legal grounds for processing personal data other than consent, and the one that we are applying is:

i) having a "legitimate interest" to process data: if what you are doing is broadly reasonable having regard to the individual's interests, legitimate interests may be available and allow you to avoid seeking consent, if you provide clear information to the individual, most obviously through a privacy policy

- Legitimate interests is the most flexible lawful basis for processing, but it will not always be the most appropriate.
- It is likely to be most appropriate where we use people's data in ways they would reasonably expect and which have a minimal privacy impact, or where there is a compelling justification for the processing.
- When we choose to rely on legitimate interests, we are taking on extra responsibility for considering and protecting people's rights and interests.
- There are three elements to the legitimate interests basis. It helps to think of this as a three-part test. We need to:
 - identify a legitimate interest;
 - show that the processing is necessary to achieve it; and
 - balance it against the individual's interests, rights and freedoms.
- The legitimate interests can be our own interests or the interests of third parties. They can include commercial interests, individual interests or broader societal benefits.
- The processing must be necessary. If we can reasonably achieve the same result in another less intrusive way, legitimate interests will not apply.
- We must balance our interests against the individual's. If they would not reasonably expect the processing, or if it would cause unjustified harm, their interests are likely to override your legitimate interests.
- Keep a record of our legitimate interests assessment (LIA) to help us demonstrate compliance if required.
- We must include details of our legitimate interests in our privacy information.

Legitimate interests assessment

First, we identify the legitimate interest(s). Consider:

- *Why do you want to process the data – what are you trying to achieve?*
- We are doing very little processing of the data, only sufficient to serve the needs of our members
- *Who benefits from the processing? In what way?*
- Our members benefit, by receiving a better service
- *Are there any wider public benefits to the processing?*
- No
- *How important are those benefits?*
- N/A
- *What would the impact be if you couldn't go ahead?*
- We could no longer operate the club.
- *Would your use of the data be unethical or unlawful in any way?*
- No

Second, apply the necessity test. Consider:

- *Does this processing actually help to further that interest?*
- Yes, we do minimal processing and only in order to further the interest
- *Is it a reasonable way to go about it?*
- Yes, we choose the least intrusive way to go about it
- *Is there another less intrusive way to achieve the same result?*
- No

Third, do a balancing test. Consider the impact of your processing and whether this overrides the interest you have identified. You might find it helpful to think about the following:

- *What is the nature of your relationship with the individual?*
- He is a member of our club
- *Is any of the data particularly sensitive or private?*
- No, it is mainly in the nature of contact information
- *Would people expect you to use their data in this way?*
- Yes, since we only use it in the interests of the members
- *Are you happy to explain it to them?*
- Yes
- *Are some people likely to object or find it intrusive?*
- We do not think so
- *What is the possible impact on the individual?*
- None that we can envisage
- *How big an impact might it have on them?*
- Hopefully none
- *Are you processing children's data?*
- No
- *Are any of the individuals vulnerable in any other way?*
- We do not think so
- *Can you adopt any safeguards to minimise the impact?*
- Since we do not think there is any impact, there is nothing to safeguard
- *Can you offer an opt-out?*
- Only by ceasing to be a member