



# **CERCLE FRANÇAIS DE WINCHESTER**

## **PRIVACY POLICY**

### **Introduction**

In order to operate, the Cercle Français de Winchester needs to gather, store and use certain forms of information about individuals.

These can include members, visitors, suppliers, volunteers and members of the general public.

This policy explains how this data shall be collected, stored and used in order to meet the Cercle Français de Winchester's data protection standards and comply with the law.

### **Why is this policy important?**

This policy ensures that the Cercle Français de Winchester:

- Protects the rights of our members and visitors
- Complies with data protection law and follows good practice
- Is protected from the risks of a data breach

### **Who and what does this policy apply to?**

This applies to all those handling data on behalf of the Cercle Français de Winchester, e.g.:

- Committee Members
- Members
- Independent contractors and approved suppliers.

It applies to all Personal Information that the Cercle Français de Winchester holds relating to individuals:

- Names
- Contact information: email addresses, postal addresses, phone numbers
- Any special requirements or requests the member or visitor may have and has advised to the Cercle Français de Winchester
- Payment History: date of payment, amount, payer, gift aid
- Attendance Record: dates of attendance

Everyone who has access to data as part of the Cercle Français de Winchester has a responsibility to ensure that they adhere to this policy.

### **Roles and responsibilities**

- The Cercle Français de Winchester as an entity is the Data Controller. The Controller determines the purposes and means of collecting and processing personal data.
- A Data Processor is responsible for processing personal data on behalf of the Controller. Individual Committee Members are Processors, as are approved third parties who provide a service to the Cercle Français de Winchester.
- A Data Subject is a member, potential member or visitor, whose personal data is collected and maintained and processed by the Cercle Français de Winchester.
- Responsibility and authority for data protection rests with a member of the Committee, as appointed from time to time. Any questions relating to the collection or use of data shall be directed to the Committee.

## **Data Protection Principles**

### **1. We only collect and use personal data for specified and lawful purposes.**

When collecting data, the Cercle Français de Winchester will always explain to the subject why the data is required and what it will be used for.

We will never use data for any purpose other than that stated or that can be considered reasonably to be related to it. For example, we will never pass on personal data to 3rd parties without the explicit consent of the subject.

### **2. We fairly and lawfully process personal data.**

- The Cercle Français de Winchester will collect data in two ways:
  - Where the member or visitor has granted their consent in writing to the collection, maintenance and processing of their personal data for the legitimate purposes of the Cercle Français de Winchester as explained in the Privacy Statement or
  - Where required to fulfil a legal obligation.
- A member's Personal Information will be collected when they first join the Cercle Français de Winchester and will be used to contact the member regarding:
  - The Cercle Français de Winchester membership administration and activities
  - From time to time, pass on information from approved third parties concerning France or the French language, or about events connected to France or the French language.

Personal Information will also subsequently be collected in relation to their membership, Payment History and Attendance Record.

- The Personal Information of Committee Members will be collected when they take up a position and will be used to contact them regarding the Cercle Français de Winchester administration related to their role.
- A visitor's Personal Information will be collected when they first attend a Cercle Français de Winchester meeting or other activity and will be used to contact the visitor regarding:
  - The Cercle Français de Winchester membership administration and activities
  - From time to time, pass on information from approved third parties concerning France or the French language, or about events connected to France or the French language.

Payment History will also subsequently be collected in relation to their attendance at Cercle Français de Winchester meetings and other activities.

### **3. We ensure any data collected is relevant and not excessive.**

The Cercle Français de Winchester will not collect or store more data than the minimum information required for its intended purpose.

### **4. We ensure data is accurate and up-to-date.**

The Cercle Français de Winchester will ask members and visitors to check and update their data once every two years.

Any individual will be able to update their data at any point by contacting the Membership Secretary in writing.

### **5. We ensure data is not kept longer than necessary.**

The Cercle Français de Winchester will keep data on individuals for two years from the date of their Consent Form, unless there is a legal requirement to keep records.

## **6. We process data in accordance with individuals' rights.**

The following requests and objections can be made in writing to any Committee Member:

- Members and visitors can request to see any data stored on about them.
- Members and visitors can request that any inaccurate data held on them is updated.
- Members and visitors can request to stop receiving any marketing communications.
- Members and visitors can object to any storage or use of their data.
- Members and visitors can withdraw consent to their Personal Information being held and processed.

All such requests and objections will be actioned at the earliest opportunity.

## **7. We keep personal data secure.**

The Cercle Français de Winchester will ensure that data held by us is kept secure.

- Electronically-held data will be held within a secure environment.
- Passwords for electronic data files will be re-set each time an individual with data access leaves their role/position.
- Physically-held data (e.g. membership forms) will be stored securely.
- Access to data will only be given to Committee Members where it is clearly necessary for the running of the Cercle Français de Winchester. The Committee or approved Committee Members will decide in what situations this is applicable and will keep a master list of who has access to data.

## **8. Transfer to countries outside the United Kingdom.**

Personal data is sent to, recorded and stored in the United Kingdom, or on servers which can be located overseas and which use business software and services which provide levels of privacy compliant with the requirements of the General Data Protection Regulation (GDPR) (EU) 2016/679'.

## **9. Cookies on the Cercle Français de Winchester website.**

A cookie is a small text file that is downloaded onto 'terminal equipment' (e.g. a computer or smartphone) when the user accesses a website. It allows the website to recognise that user's device and store some information about the user's preferences or past actions.

The Cercle Français de Winchester does not use cookies on our website [www.cfwinchester.org.uk](http://www.cfwinchester.org.uk).

## **10. Privacy Policy review.**

This policy shall be reviewed on 1 June 2019 and at least annually thereafter.