



## Friends of Gibraltar Heritage Society

### Privacy Policy

#### 1. Purpose of the Policy

The Friends of Gibraltar Heritage Society is committed to keeping members' personal data safe and secure, and handling it in accordance with our legal obligations. This Privacy Policy sets out the purposes for which we process members' personal data, who we share it with and what rights members have in relation to that data.

#### 2. Who's in control?

It is important that members understand who is responsible for keeping their data safe. Col. Julian Lyne-Pirkis has been appointed as our Data Protection Officer (DPO) and has responsibility, within FOGHS, for making sure members' data is treated in accordance with this Privacy Policy and the law.

#### 3. What data do we collect and where from?

We collect some data directly from members when they apply for membership. This data includes the following:

- a. full name;
- b. postcode and address;
- c. email address;
- d. bank account details (if they choose to provide them);
- e. preferences for communication.
- f. We may also collect information that members voluntarily provide to us when they contact us with queries, complaints, comments or praise, or information that they provide voluntarily (Voluntary Data).

#### 4. What do we use members' data for?

It is important that members understand how and why we use the personal data that we collect about them. This section sets out the different purposes for which we process personal data and which types of personal data we need for each purpose.

##### a. Managing membership and providing members with our services:

- i. to contact members occasionally with service messages, for example to provide them with reminders, where members' subscription is due to expire or to contact them about events or topics of wider interest relating to Gibraltar
- ii. To distribute our magazine "Rock Talk";
- iii. We use members' Voluntary Data to enable us to respond to queries, complaints or comments that members have and to make sure that these are appropriately dealt with, members must make sure before they provide it that they are happy for us to use that Voluntary Data for the purposes set out in this Privacy Policy.

##### b. Publications and Internal Communication

- i. We may use members' personal or voluntary data to communicate with them about their contributions to items to be published in Newsletters or "Rock Talk".
- ii. We may wish, from time to time, to include some of members' personal or voluntary data in material we intend to publish but will always seek ' permission

first.

**c. Improving our service**

- i. We may conduct surveys or collect data for the purposes of analysing insights and information to enable us to improve the membership experience.

**d. Competitions and Prize Draws**

- i. We may use personal data to allow members to participate in competitions and to carry out any activities required in relation to those competitions, for example contacting them to let them know they have won a prize and using members' addresses to send members' prize.
- ii. enable us to notify them and provide them with any prizes they have won if they enter any prize draws.

**e. Marketing and advertising**

- i. We do not use any of members' data for external advertising or marketing purposes and members' data is not passed to third parties except as explained in this Privacy Policy.
- ii. While FOGHS does not get involved in commercial marketing or advertising, we may sometimes wish to provide members with information about events or activities which contribute to the aims of the Society as set out in the Articles of Association. This will normally be done in one of our Newsletters or may be by direct e-mail or post.

**f. Archiving**

- i. We periodically review the data that we keep in our archive and we will delete members' data held in the archive where we consider it is no longer of value or interest.

**5. How can a member opt out?**

Members can opt out of receiving informational material or e-mails at any time by contacting the Membership Secretary at: *The Friends of Gibraltar (GDPR), Gibraltar House, 150 The Strand, WC2R 1JA.*

However, even if they opt out, we will still need to send members service communications by e-mail such as information about General Meetings, subscriptions or changes to our services or conditions.

**6. What is our legal basis for using members' data?**

Data protection law says that we must tell members the legal basis that we rely on to process their personal data for the purposes that we have notified to them. We process members' personal data for all the purposes identified under *What do we use members' data for?* above on the basis that it is in the legitimate interests of FOGHS to carry out these activities. Information about what those interests are is set out below.

**a. Purpose: Managing membership and providing members with our services**

**Legitimate interests:** *To ensure that the Society complies with its obligations as a Registered Charity and a Private Company Limited by Guarantee.*

**b. Purpose: Publications and Internal Communication**

**Legitimate interests:** To ensure that all members receive the information they require and are entitled to in pursuit of the Aims of the Society as set out in the Articles of Association.

**c. Purpose: Improving our services**

**Legitimate interests:** To make sure that we continue to improve members' experience and provide them with the best and most effective service possible.

**d. Purpose: Advertising**

**Legitimate interests:** To provide information that is relevant to members to ensure they have the best experience possible of the Society and its partners (eg. The Gibraltar Heritage Trust).

Members have the right to object to us processing their personal data for the purposes set out above. Unless we can show that we have a compelling legitimate reason to continue processing members' personal data, we will stop processing it. Members can resign from FOGHS at any time in which case we will fully delete their personal data after an appropriate time.

In respect of the use of members' email address for email purposes, we process this on the basis that we have members' consent to do so. They can withdraw members' consent at any time by following the instructions to "unsubscribe" in any email communications.

**7. The Friends of Gibraltar Website**

The Friends of Gibraltar website (<https://friendsofgibraltar.org.uk>) does not currently collect personal data but provides information on a range of relevant topics to the general public. The material and information containing Personal or Voluntary data will only be published on the site with permission under the terms of paragraph 4.b.ii above. Should the functionality of the site be developed in the future we will consult members about the need for it to hold personal information.

**8. Who do we share members' data with?**

We do not share members' personal data with third parties without members' specific consent, this includes the information given on the Membership form which we send to members' Bank on the setting up of Bankers Orders and to HMRC for the purposes of Gift Aid claims (where this has been signed on members' Membership Form).

We provide lists to Gibraltar House for posted newsletters and to the publisher of Rock Talk for distribution. We use MailChimp for the production and distribution of newsletters. In some circumstances it may be necessary to provide lists of names to providers of services or venues in support of FOGHS events. By enrolling or signing up to a specific event or activity we will assume members' permission to include their name on such lists. We will ask that these lists are destroyed after an event or on completion of a circulation.

We do not transfer or store members' personal data outside the European Economic Area (EEA). If we do carry out any further transfers of members' data outside the EEA, we will inform them and we will ensure that the recipient provides an adequate level of protection of members' personal data.

**9. How long do we keep members' data for?**

We will keep all members' personal data for as long as they remain a member of the Friends of Gibraltar Heritage Society. If they resign, we will delete all their Personal Data from our records, except to the extent that it is included in material that may have been published in Newsletters or in "Rock Talk", as soon as we can after they have resigned. However, we may need to use some data after a member resigns for limited purposes, for example if we need members' data in order to respond to any complaints or claims that they make. Past members' names may be retained for historical purposes, subject to paragraph 10e below. If this is the case, we will only keep the data for as long as we need to in order to fulfil those purposes.

**10. What rights do members have?**

Members have a number of rights under data protection law. We will normally need to ask members for proof of members' identity before we can respond to a request to exercise any of the rights in this section and we may need to ask them for more information, for example to help us to locate the personal data that members' request relates to.

We will respond to any requests to exercise members' rights as soon as we can and in any event within one month of receiving members' request and any necessary proof of identity or further information.

**a. A right to access members' information**

- i. Members have a right to ask us to send them a copy of members' Account Data and all other personal data that we hold about them (subject to some exceptions). A request to exercise this right is called a "subject access request" and must be made in writing to the Membership Secretary at *The Friends of Gibraltar (GDPR), Gibraltar House, 150 The Strand, WC2R 1JA*.

**b. A right to object to us processing members' information**

- i. Members have a right to object to us processing any personal data that we process where we are relying on legitimate interests as the legal basis of our processing. This includes all of a member's personal data that we process for all of the purposes set out in this Privacy Policy, with the exception of our use of a member's e-mail address to send them communications with their consent (but they can withdraw members' consent to this at any time).
- ii. If we have compelling legitimate grounds to carry on processing members' personal data, we will be able to continue to do so. Otherwise, we will cease processing members' personal data.
- iii. Members can exercise this right by contacting: *The Friends of Gibraltar (GDPR), Gibraltar House, 150 The Strand, WC2R 1JA*.

**c. A right to ask us not to market to them**

- i. Members can ask us not to send them direct marketing or advertising. They can do this at any time but it is currently the policy of the FOGHS not to advertise or market on behalf of third parties in any case.

**d. A right to have inaccurate data corrected**

- i. Members have a right to ask us to correct inaccurate data that we hold about them. If we are satisfied that the new data they have provided is accurate, we will correct members' personal data as soon as possible.
- ii. Members can update their personal data at any time by contacting the Membership Secretary at: *The Friends of Gibraltar (GDPR), Gibraltar House, 150 The Strand, WC2R 1JA*.

**e. A right to have members' data erased**

- i. Members have a right to ask us to delete their personal data in certain circumstances, for example if we have processed members' data unlawfully or if we no longer need the data for the purposes set out in this Privacy Policy.
- ii. We will process any personal data we hold about members when they resign, as set out under **How long do we keep members' data for?** above. This means that it will no longer identify them and ceases to be "personal data".
- iii. If a member asks us to delete their personal data and they are happy for their membership to end, we will delete or process their personal data as set out above. If they ask us to delete their personal data but they do not want to resign,

we may not be able or obliged to comply with this as we will usually need to keep processing members' data in a personally identifiable form to keep their membership open.

**f. A right to have processing of members' data restricted**

- i. Members can ask us to restrict processing of their personal data in some circumstances, for example if they think the personal data is inaccurate and we need to verify its accuracy, or if we no longer need the data but they require us to keep it so that they can exercise their own legal rights.
- ii. Restricting members' personal data means that we only store members' personal data and don't carry out any further processing on it unless they consent or we need to process the data to exercise a legal claim or to protect a third party or the public.

**11. How can members contact us?**

If members have any questions or concerns about this Privacy Policy and/or our processing of members' personal data, they can get in touch with our Data Protection Officer by writing to: *The Friends of Gibraltar (GDPR), Gibraltar House, 150 The Strand, WC2R 1JA.*

**12. What if members have a complaint?**

Members have a right to complain to the Information Commissioner's Officer (ICO), which regulates data protection compliance in the UK, if they are unhappy with how we have processed members' personal data.

Members can find out how to do this by visiting [www.ico.org.uk](http://www.ico.org.uk) ([opens in a new window](#)).

**13. What if this policy changes?**

We may make changes to this Privacy Policy from time to time. Any changes we make will be posted on this page. We may also notify members by email if significant changes are made.

*Policy updated on 18 November 2018*