

# Combined Rotary Clubs of Wolverhampton

## Privacy Notice

The Combined Rotary Clubs of Wolverhampton (“we”/”us”/”club”) promise to respect the confidentiality of any personal data you share with us, to keep it safe, and we will always take every effort to protect your privacy.

We pride ourselves on our honesty and openness and will always be clear how, when and why we collect and process your information; we promise we will never do anything with your details that you wouldn’t reasonably expect.

Developing a better understanding of our members and donors is crucial, and your personal data allows us to manage your membership and provide the services you are entitled to.

It is expected that rotary club members and district officers may also process member personal data on behalf of the Rotary organisation and they too will also be bound by this privacy notice.

### **We collect information in the following ways:**

#### **When you give it to us DIRECTLY**

There are many ways you may give us your information. For example, when you nominate a candidate, make a donation, purchase our products or communicate with us either by phone, in writing, including email or in person. We are responsible for your data at all times.

#### **When you give it to us INDIRECTLY**

Your information may be shared with us by independent organisations. These independent third parties will only share your information when you have consented. You should check their Privacy Notice when you provide your information to understand fully how they will process your data.

#### **Via Social Media**

Depending on your settings or the privacy notices for social media and messaging services like Facebook, WhatsApp, LinkedIn or Twitter, etc., you might give us permission to access information from those accounts or services.

#### **Via information available publicly**

This may include information found in places such as websites , Companies House and information that has been published in articles/newspapers.

#### **What personal information we collect and how we use it**

We will only ever capture the minimum amount of information that we need to in relation to your nomination, or services we provide to you and we promise to keep your information secure. The personal data we may collect includes:

- Your name
- Your contact details (address, email and telephone number as appropriate)
- Your date of birth
- Gender
- Details of the nomination.

Where it is appropriate, we may also ask for additional information, and this will be made clear to you at the time the personal information is requested.

#### **How we will use your data**

We will use your personal data for the legitimate interest of conducting the nomination for Wolverhampton Young Citizen, these will include:

- Administration
- Provide you with the information you would reasonably expect to receive as part of your nomination
- Providing services or information to nominees/sponsors for their general activities, including Disclosure and Barring Service checks
- Communicating organisational messages and information to nominees/sponsors.

Facilitate selection interviews and other special event planning  
Supporting rotary club and district newsletters, district magazine and 'The Rotarian' and 'Rotary' magazines  
Providing information and updates to nominees on rotary programmes and service projects  
Preparation of nominees' pen-pictures for presentation ceremony  
To present our website and its contents to you and to allow you to participate in interactive features on our website  
Keep a record of your relationship with the Rotary organisation for a maximum period of 5 years  
In any other way we may describe when you provide the information  
For any other purposes with your consent



### **Sensitive information**

We do not collect any personal information on members classified as 'sensitive' under GDPR. For example, information about an individual's: race; ethnic origin; politics; religion; trade union membership; genetics; biometrics (where used for ID purposes); health; sex life; or sexual orientation.

### **Interact, Rotakids and under 18's data**

We do not collect information from under 18's without the consent of their parent/guardian.

### **Data Sharing**

#### **1) Our service/host providers**

In the course of our legitimate activities, there may be a need for us to share, or give access to, your personal data to third parties that provide us with services or host our applications/software that you may access.

We will ensure that data processing agreements, compliant to GDPR, are in place before sharing with, or giving access to, your data with any of our service/host providers outside of the Rotary organisation.

#### **2) Sharing within the Rotary organisation**

The Rotary organisation is made up of Rotary International, The Rotary Foundation (TRF), Rotary International in Great Britain and Ireland, the Rotary Foundation United Kingdom (RFUK), the RIBI Donations Trust.

On occasion, the club may collect personal data for our individual activities. This means that we are also responsible for protecting your data under GDPR legislation whilst it is in our safekeeping and we will process your data in accordance with the privacy notices of the club, district, National & International organisations as appropriate.

#### **3) Sharing with third parties**

We will NEVER commercially sell your personal data to anyone else.

We will only ever share your personal data in other circumstances, not listed above, if we have your explicit and informed consent at the time of collection. However, we may need to disclose your details if required to by the police, other agencies, for example HMRC, regulatory bodies or our legal advisors.

### **How we keep your information safe and who has access to it**

We will ensure that there are appropriate physical and technical controls in place to protect your personal details and we will work within good practice, for example, confidential paper records are securely stored, or securely disposed of as appropriate. The clubs and its members will ensure that PCs/devices holding personal information on behalf of the club are protected with appropriate anti-virus and malware protection and this will routinely be monitored by the club.

We will undertake regular reviews of who has access to information that we hold to ensure that your personal information is only accessible by appropriate members, Rotary officers, Rotary staff and our service/host providers. We will undertake comprehensive checks on the companies we use before we work with them and will ensure any contracts set out our expectations and requirements regarding how they manage the personal information they may have access to as part of providing those services.

We have a duty to report certain types of personal data breaches to the relevant supervisory authority, and where feasible, we will do this within 72 hours of becoming aware of the breach. If a breach is detected and likely to result in a high risk of adversely affecting you, we will inform you without undue delay.

**Where we store your information:**

The clubs may hold your information in various ways depending on your relationship with us, for instance:

As a non-member of Rotary, with your consent, your personal information will be held by individual club officers or members for the purpose of specific activities.

Your personal information will be held securely within the UK or the EU by the combined Rotary Clubs of Wolverhampton and their secure hosting service provider.

**How long we retain your information and how we keep it up to date**

We will only keep your information for as long as we need it to assist you with your nomination and any enquiry you make to us. There are statutory timescales on how long we should keep your information, for example, financial records must be kept for 7 years, information associated with Health & Safety can be retained for up to three years after an event etc. We shall delete your information according to these statutory limits, or according to guidance issued by the Information Commissioner, or guidance issued at the time the personal information is collected.

**Cookies**

Like most websites, we may use “cookies” to help us make our site, and the way you use it, better. We do not store any personal data in the cookies that we use.

Cookies mean that a website will remember you. They’re small text files that sites transfer to your computer (or phone or tablet). They make interacting with a website faster and easier – for example by automatically filling your name and address in text fields.

In addition, the type of device you’re using to access our website or apps and the settings on that device may provide us with information about your device, including what type of device it is, what specific device you have, what operating system you’re using, what your device settings are. Your device manufacturer or operating system provider will have more details about what information your device makes available to us.

The type and quantity of information we collect and how we use it depends on why you are providing it. You should be able to control what cookies are placed on your device through your browser settings. Go to [www.aboutcookies.org](http://www.aboutcookies.org) to find out more about cookies, including how to see what cookies have been set and how to manage and delete them.

We use Google Analytics to analyse the use of our websites by generating statistical and other information.

Details captured during your visit to our websites will include, but are not limited to, traffic data, location data, weblogs and other communication data and the resources you access. However, all data collected is anonymous and will not identify you as an individual.

Google, not the Association, stores this activity information. You can view Google’s privacy notice here: [www.google.com/privacypolicy](http://www.google.com/privacypolicy)

To opt out of being tracked by Google Analytics across all websites visit their website: <https://tools.google.com/dlpage/gaoptout>

**Your rights**

The General Data Protection Regulations gives you certain rights and these are listed below for your convenience, further clarification of your rights is available on the Information Commissioners website:

- You have a right to be informed when your personal data is being collected, what is collected and how it will be used or shared.
- You have a right of access to your personal data: the right of access allows you to be aware of and verify the lawfulness of the processing of your personal data. You can also request a copy of the information which we hold on you. This information will be provided free of charge, unless the request is found to be manifestly unfounded or excessive then a reasonable fee will be charged. The application should be made in writing, by letter or email, and addressed to the clubs, contact details shown below, enclosing two proofs of identification. Applicants should be aware that where requests are manifestly unfounded or excessive, in particular because they are repetitive, the club can:
  - charge a reasonable fee taking into account the administrative costs of providing the information; or
  - refuse to respond.

- You have a right in certain circumstances to have inaccurate personal data rectified, blocked (restrict processing), erased (right to be forgotten), or destroyed.
- You have a right in certain circumstances to object to the processing of your personal data for such reasons as direct marketing, automated decision making, profiling; although we can confirm we make no decisions on you using an automated process.
- You have a right in certain circumstances to data portability.

In certain situations, these rights may not apply, to process the nomination we will need to communicate with you and/or the nominee and you will not be able to opt out of those communications.

We collect and process your personal data through legitimate interests or because you have provided it to us to enable us to deliver a service to you. We will only process your personal data as you would reasonably expect us to.

Finally, if you are unhappy with how we have processed your information, you have the right to lodge a complaint with the Office of the Information Commissioner, contact details below.

### **Changes to this privacy notice**

We may change this privacy notice from time to time. If we make any significant changes in the way we treat your personal information we will make this clear on our website or by notifying you directly.

### **Our contact details**

Combined Rotary Clubs of Wolverhampton – Wolverhampton Young Citizen Competition  
Contact details: Honorary Secretary – Rotarian David Johns - [Djohnswheat@aol.com](mailto:Djohnswheat@aol.com).

### **Complaints**

If you are unhappy with how we have processed your personal information, please firstly contact the clubs, details above. If you are still unhappy you may contact the following:

### **Information Commissioner's Office**

Wycliffe House  
Water Lane  
Wilmslow  
Cheshire, SK9 5AF  
Helpline: 0303 123 1113 (local rate) or ++44 1625 545 745

***Date created by the clubs: JANUARY 2019***

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