

Appendix 1 – Privacy Notice

When you contact us

The information you provide (personal information such as name, address, email address, phone number, organisation) will be processed and stored to enable us to contact you and respond to your correspondence, to provide information and / or to provide our facilities and services. We do not routinely share this information outside of our organisation but may share this information with our legal or trusted advisers for the purpose of obtaining advice, with government agencies if required by law, or with law enforcement agencies for the prevention or detection of crime.

The Right to Process Information

General Data Protection Regulations Article 6 (1) (a) (b) and (e)

- Processing is with consent of the data subject or
- Processing is necessary for compliance with a legal obligation or
- Processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller

Information Security

Alcester Unionist Club has a duty to ensure the security of personal data. We make sure that your information is protected from unauthorised access, loss, manipulation, falsification, destruction or unauthorised disclosure. This is done through appropriate technical measures and appropriate policies.

We will only keep your data for the purpose it was collected for and only for as long as is necessary. After which it will be deleted. (You may request the deletion of your data held by Alcester Unionist Club at any time).

Children

We will not process any data relating to a child (under 13) without the express parental / guardian / carer consent of the child concerned.

Access to Information

You have the right to request access to the information we have about you. You can do this by contacting the Club – alcesterunionistclub@yahoo.co.uk – FTAO the Committee

Information Correction

If you believe that the information we have about you is incorrect, you may contact us so that we can update it and keep your data accurate. the Club – alcesterunionistclub@yahoo.co.uk – FTAO the Committee to request this.

Information Deletion

If you wish Alcester Unionist Club to delete the information about you please contact the Club – alcesterunionistclub@yahoo.co.uk – FTAO the Committee to request this.

Right to Object

If you believe that your data is not being processed for the purpose it has been collected for, you may object: Please contact the Club – alcesterunionistclub@yahoo.co.uk – FTAO the Committee to object.

Rights Related to Automated Decision Making and Profiling

Alcester Unionist Club does not use any form of automated decision making or the profiling of individual personal data.

Conclusion

In accordance with the law, we only collect a limited amount of information about you that is necessary for correspondence, information and service provision. We do not use profiling and we do not sell your data to third parties. We do not use your data for purposes other than those specified. We make sure your data is stored securely. We delete all information deemed to be no longer necessary. We regularly review our Privacy Policy to keep it up to date in protecting your data.

Complaints

If you have a complaint regarding the way your personal data has been processed you may make a complaint to **The Data Controller, Alcester Unionist Club Limited, London House, 46 High Street, Alcester, Warwickshire B49 5AB, Tel +44 1789 762458, email “alcesterunionistclub@yahoo.co.uk”**

Appendix 2 – Privacy Policy

- Your personal data – what is it?

“Personal data” is any information about a living individual which allows them to be identified from that data (for example a name, photographs, videos, email address, or address). Identification can be by the personal data alone or in conjunction with any other personal data. The processing of personal data is governed by legislation relating to personal data which applies in the United Kingdom including the General Data Protection Regulation (the “GDPR) and other local legislation relating to personal data and rights such as the Human Rights Act.

- Who are we?

This Privacy Policy is provided to you by Alcester Unionist Club which is the data controller for the purposes of this policy. Other data controllers the Club works with:

- Local authorities
- Community groups
- Charities
- Other not for profit entities
- Contractors

- What personal data is collected?

- Names, titles, aliases, photographs;
- Contact details such as telephone numbers, addresses, and email addresses;
- Where they are relevant to the services provided by the Club, or where you provide them to us, we may process demographic information such as gender, age, marital status, nationality, education/work histories, academic/professional qualifications, hobbies, family composition, and dependants;
- Where you pay for activities such as use of the Club’s premises and / or services, financial identifiers such as bank account numbers, payment card numbers, payment/transaction identifiers, policy numbers, and claim numbers;
- Information from other sources e.g. Referral or recommendation programmes
- Publicly accessible sources

The data we process may include sensitive personal data or other special categories of data such as racial or ethnic origin, mental and physical health, details of injuries, biometric data, data concerning and sex life or sexual orientation. These types of data, described in the GDPR as "Special categories of data", require higher levels of protection. We need to have further justification for collecting, storing and using this type of personal data. We may process special categories of personal data in the following circumstances:

- In limited circumstances, with your explicit written consent
- Where we need to carry out our legal obligations
- Where it is needed in the public interest

Less commonly, we may process this type of personal data where it is needed in relation to legal claims or where it is needed to protect your interests (or someone else's interests) and you are not capable of giving your consent, or where you have already made the information public.

In limited circumstances, we may approach you for your written consent to allow us to process certain sensitive personal data. If we do so, we will provide you with full details of the personal data that we would like and the reason we need it, so that you can carefully consider whether you wish to consent.

Alcester Unionist Club will comply with data protection law. This says that the personal data we hold about you must be:

- Used lawfully, fairly and in a transparent way.
- Collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes.
- Relevant to the purposes we have told you about and limited only to those purposes.
- Accurate and kept up to date.
- Kept only as long as necessary for the purposes we have told you about.
- Kept and destroyed securely including ensuring that appropriate technical and security measures are in place to protect your personal data to protect personal data from loss, misuse, unauthorised access and disclosure. We use your personal data for some or all of the following purposes:
- To deliver services and to understand your needs to provide the services that you request and to understand what we can do for you and inform you of other relevant services;
- To confirm your identity in order for us to provide some services;
- To contact you by post, email, telephone or using social media (e.g. Facebook, Twitter, WhatsApp, etc);
- To help us to build up a picture of how we are performing;
- To prevent and detect fraud and corruption in the use of Club funds and where necessary for the law enforcement functions;
- To enable us to meet all legal and statutory obligations;
- To carry out comprehensive safeguarding procedures (including due diligence and complaints handling) in accordance with best safeguarding practice from time to time with the aim of ensuring that all children and adults-at-risk are provided with safe environments and generally as necessary to protect individuals from harm or injury;
- To promote the interests of the Club;
- To maintain our own accounts and records in line with our legal responsibilities and obligations;
- To seek your views, opinions or comments;
- To notify you of changes to our facilities, services, events and staff, Committee Members and Officers;
- To send you communications which you have requested and that may be of interest to you. These may include information about campaigns, appeals, other new projects or local initiatives;
- To process relevant financial transactions payments for goods and services supplied to and by the Club
- To allow the statistical analysis of data so we can plan the provision and future development of the Club and its services and facilities.

Our processing may also include the use of CCTV systems for the prevention and prosecution of crime.

- **What is the legal basis for processing your personal data?**

The Club has certain legal duties and functional requirements. Your personal data is processed and stored either for compliance with a legal obligation or to ensure the Club can function within its Rules for the benefit of the membership. Sometimes when exercising these powers or duties it is necessary to process personal data of members and / or people using the Club's services and facilities. We will always take into account your interests and rights. This Privacy Policy sets out your rights and the Club's obligations to you in detail.

We may also process personal data if it is necessary for the performance of a contract with you, or to take steps to enter into a contract. An example of this would be processing your data in connection with the use of Club's premises for a private social event.

Sometimes the use of your personal data requires your consent. We will first obtain your consent to that use.

- **Sharing your personal data**

The Club will implement appropriate security measures to protect your personal data. This section of the Privacy Policy provides information about the third parties with whom the Club might share your personal data. These third parties also have an obligation to put in place appropriate security measures and will be responsible to you directly for the manner in which they process and protect your personal data. It is likely that we will need to share your data with some or all of the following (but only where necessary):

- Our agents, suppliers and contractors. For example, we may ask a commercial provider to promote or manage an event, or to publish or distribute newsletters on our behalf, or to maintain our database software;
- On occasion, the local authorities or other not for profit bodies with which we are carrying out joint ventures e.g. in relation to provision of facilities or events for the community.

- **How long do we keep your personal data?**

We will keep some records permanently if we are legally required to do so. We may keep some other records for an extended period of time. For example, it is current best practice to keep financial records for a minimum period of 8 years to support HMRC audits or provide tax information. We may have legal obligations to retain some data in connection with our status as a member's club. The Club is permitted to retain data in order to defend or pursue claims. In some cases, the law imposes a time limit for such claims (for example 3 years for personal injury claims or 6 years for contract claims). We will retain some personal data for this purpose as long as we believe it is necessary to be able to defend or pursue a claim. In general, we will endeavour to keep data only for as long as we reasonably think we need it.

- **Your rights and your personal data**

When exercising any of the rights listed, in order to process your request, we may need to verify your identity for your security. In such cases we will need you to respond with proof of your identity before you can exercise these rights.

- At any point you can contact us to request the personal data we hold on you as well as why we have that personal data, who has access to the personal data and where we obtained the personal data from. Once we have received your request we will respond within one month. There are no fees or charges for the first request but additional requests for the same personal data or requests which are manifestly unfounded or excessive may be subject to an administrative fee.
- If the data we hold on you is out of date, incomplete or incorrect, you can inform us and your data will be updated.
- If you feel that we should no longer be using your personal data or that we are unlawfully using your personal data, you can request that we erase the personal data we hold.
- When we receive your request we will confirm whether the personal data has been deleted or the reason why it cannot be deleted (for example because we need it for to comply with a legal obligation)
- You have the right to request that we stop processing your personal data or ask us to restrict processing. Upon receiving the request we will contact you and let you know if we are able to comply or if we have a legal obligation to continue to process your data.
- You have the right to request that we transfer some of your data to another controller. We will comply with your request, where it is feasible to do so, within one month of receiving your request.
- You can withdraw your consent easily by telephone, email, or by post
The Data Controller, Alcester Unionist Club Limited, London House, 46 High Street, Alcester, Warwickshire B49 5AB, Tel +44 1789 762458, email "alcesterunionistclub@yahoo.co.uk"
- You can contact the Information Commissioners Office on 0303 123 1113 or via email <https://ico.org.uk/global/contact-us/email/> or at the Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF.

- **Transfer of Data Abroad**

Any personal data transferred to countries or territories outside the European Economic Area (“EEA”) will only be placed on systems complying with measures giving equivalent protection of personal rights either through international agreements or contracts approved by the European Union. Our website is also accessible from overseas so on occasion some personal data (for example in a newsletter) may be accessed from overseas.

- **Further processing**

If we wish to use your personal data for a new purpose, not covered by this Privacy Policy, then we will provide you with a Privacy Notice explaining this new use prior to commencing the processing and setting out the relevant purposes and processing conditions. Where and whenever necessary, we will seek your prior consent to the new processing.

- **Changes to this policy**

We keep this Privacy Policy under regular review and we will place any updates on the Club’s website. This Policy was last updated in December 2024.

- **Contact Details**

Please contact us if you have any questions about this Privacy Policy or the personal data we hold about you or to exercise all relevant rights, queries or complaints at:

The Data Controller, Alcester Unionist Club Limited, London House, 46 High Street, Alcester, Warwickshire B49 5AB, Tel +44 1789 762458, email “alcesterunionistclub@yahoo.co.uk”

Appendix 3 – Data Subject Access Request Policy

1. Purpose

This document sets out our policy for responding to Subject Access Requests under the GDPR (General Data Protection Regulation), which came into force in May 2018. This document explains the rights of the data subject in relation to a Data Subject Access Request and Alcester Unionist Club's responsibilities when dealing with that request.

2. Individual Rights

An individual has the right to know what information is held about them. GDPR in the UK provides a framework to ensure that personal information is handled properly. This information must be:

- Processed fairly, lawfully and in a transparent manner
- Processed for specific, legitimate and lawful purposes
- Adequate, relevant and not excessive
- Accurate and up to date
- Not kept for longer than necessary
- Processed in line with an individual's rights
- Secure
- Not transferred other than in accordance with agreed terms and conditions

3. Policy on providing information

Alcester Unionist Club is committed to meeting all reasonable requests for access in accordance with GDPR.

4. How do you make a Subject Access Request?

A Subject Access Request is a written request for personal information held about you by Alcester Unionist Club. You must supply your address and valid evidence to prove your identity. You have the right to see what personal information we hold about you. You are entitled to be given confirmation as to whether we hold or process your personal information, and if so you are entitled to access all your personal information as well as details of:

- The purposes for which we process your personal data;
- The categories of your personal data we process; 2
- The recipients, or categories or recipient to whom personal data has been or will be disclosed, in particular recipients in third countries or who are international organisations;
- How long we expect to store your data;
- Where you did not give us the personal data, the source from which we collected the personal data; and
- Whether we use any automated decision making in relation to the processing of your personal data.
- We will provide a copy of the personal data undergoing processing.
- You are entitled to have any mistakes in your personal data rectified, and to have the data deleted if you would no longer like us to store or process your personal data, or to request restriction of our processing of your personal data.

If you are not satisfied with how we have stored or processed your personal data, you have a right to lodge a complaint with us, by contacting **The Data Controller, Alcester Unionist Club Limited, London House, 46 High Street, Alcester, Warwickshire B49 5AB, Tel +44 1789 762458, email "alcesterunionistclub@yahoo.co.uk"**

You can also contact the Information Commissioners Office on 0303 123 1113 or via email <https://ico.org.uk/global/contact-us/email/> or at the Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF.

5. What is personal information?

“Personal data” is any information about a living individual which allows them to be identified from that data (for example a name, photographs, videos, email address, or address). Identification can be by the personal data alone or in conjunction with any other personal data. The processing of personal data is governed by legislation relating to personal data which applies in the United Kingdom including the General Data Protection Regulation (the “GDPR”) and other local legislation relating to personal data and rights such as the Human Rights Act.

6. What do we do when we receive a Subject Access Request?

- Verify your identity – If we have cause to doubt your identity, we will ask for information to verify it. For example, we may ask you for a piece of information held in your records that you might reasonably be expected to know.
- We cannot disclose personal information to anyone other than the individual in question.
- Collating information – We will gather any manual or electronically held information and identify any information provided by a third party or which identifies a third party.
- Third parties – before sharing information that relates to third parties, we will, where possible, anonymise or edit information that might affect another party’s privacy.
- We may also summarise information rather than provide a copy of the whole document. The GDPR requires us to provide information, not documents.

7. Issuing a response

Once any queries around the information requested have been resolved, copies of the information will be sent to you electronically wherever possible or, if this is not technically possible, by post.

8. Will we charge a fee?

There are no fees or charges for the first request but additional requests for the same personal data may be subject to an administrative fee.

9. What is the timeframe for responding to Subject Access Requests?

We have one month (30 calendar days) starting from when we received the information necessary to identify you, to identify the information you requested, and provide you with the information (or explain why we were unable to provide the information). Wherever possible, we will aim to complete the request in advance of the deadline.

If the Club cannot provide the information requested, we will inform you concerning this decision without delay and at the latest within one month of receipt of the request.

Appendix 4 – Security Incident Response Policy

What is a breach?

A personal data breach means a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data. This includes breaches that are the result of both accidental and deliberate causes. It also means that a breach is more than just about losing personal data.

Policy

This policy specifies the actions with respect to breaches of personal data.

Example - Personal data breaches can include:

- Access by an unauthorised third party;
- Deliberate or accidental action (or inaction) by a controller or processor;
- Sending personal data to an incorrect recipient;
- Computing devices containing personal data being lost or stolen;
- Alteration of personal data without permission; and loss of availability of personal data

Dealing with an incident

Reporting Point

On discovery of an incident either as a result of automatic notification, accidental discovery, manual record checking or any other means, all staff shall;

- Report the incident to the Committee - “alcesterunionistclub@yahoo.co.uk”
- The email report should be followed by a telephone call to the Chair, Secretary and Treasurer.
- Should neither the Chair, Secretary nor the Treasurer be available, all Committee Members should be notified by email immediately.

Reporting Point Responsibilities

All incidents must be recorded. The reporting point shall perform the following actions;

- Note the time, date and nature of incident together with a description and as much detail as appropriate on a Security Incident Response Form.
- Ensure the protection of any evidence and that a documented chain of evidence is maintained.
- Liaise with relevant authorities, individuals and the media where appropriate.
- Keep a note of all communications together with their date, time, who has been communicated with, and what the content and nature of communication was on the Security Incident Response Form.

Incident Response Plan

- 1) Assess the risk to individuals as a result of a breach: The following must be considered:
 - a) The categories and approximate number of individuals concerned, and;
 - b) The categories and approximate number of personal data records concerned, and;
 - c) The likely consequences of the personal data breach- in particular consider if the impact results in a risk to the rights and freedoms of individuals.

To help assess the risks refer to the Information Commissioner Office (ICO) website:

<https://ico.org.uk/for-organisations/report-a-breach/>

<https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/personal-data-breaches/>

- 2) If the incident is deemed to be a notifiable incident the following actions must be taken:
 - a) Within 72 hours of becoming aware of the incident (even if not aware of all the details yet):
Call ICO: 0303 123 1113 – and provide the following information:
 - What has happened
 - When and how the Club found out about the breach;
 - The people (how many) that have been or may be affected by the breach;
 - What the Club are doing as a result of the breach; and
 - Who else has been informed
 - b) For reporting a breach outside normal working hours use the ICO Reporting Form: <https://ico.org.uk/for-organisations/report-a-breach/personal-data-breach/>
- 3) If the incident is deemed to result in a high risk to the right and freedoms of individuals: Within 48 hours the affected individuals must be informed by telephone, letter or email about the incident as there may be a need for them to take actions to mitigate immediate risk of damage to them. The individuals must be told in clear and plain language: The nature of the personal data breach and;
 - A description of the likely consequences of the personal data breach; and
 - A description of the measures taken, or proposed to be taken, to deal with the personal data breach and including, where appropriate, of the measures taken to mitigate any possible adverse effects, and;
 - The name and contact details of the Club Secretary from whom more information may be obtained.
- 4) If the incident is not deemed to be notifiable: Update the Security Incident Response Form along with the outcome of the risk assessment. Include the steps and evidence used to identify and classify the risk. Include reasons why the incident is not deemed to result in a risk to the rights and freedoms of individuals.
- 5) Incident Review:

The Committee will ensure that the incident is reviewed at the next appropriate meeting.

The Committee may decide to refer further actions to a working group or external parties.

It should be noted that this final stage of the incident may require a review of this policy document.
- 6) Cyber breach insurance

The Club takes advice from its insurers on cyber breach insurance and actions on notifying and obtaining consent should a breach occur.

7) Data

A data audit will be undertaken quarterly to allow for the disposal of any data necessary and recorded as appropriate.

8) Data Subjects

The Club has in place Data Subject Access Request and Privacy Policies with appropriate notices which are published on its website. These include notifying data subjects and contractual legal rights of data subjects.

9) Policy Review

This policy will be reviewed bi-annually or at any other time the Committee deems appropriate