

## Privacy Notice

The Rotary club of Comber is a constituent member of Rotary Ireland which is a constituent member of Rotary International in Great Britain and Ireland (“we”) promise to respect the confidentiality of any personal data you share with us, or that we have access to through Rotary International, 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, donors and those who participate in our activities is crucial. Your personal data allows us to manage your membership and provide the services you are entitled to.

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

The Rotary club of Comber has one data asset, that is information on those participating in our activities. All member data is devolved from RIBI or RI data bases. We may process this data.

### **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 join as a member, begin volunteering, make a donation, purchase our products, participate in our club activities 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, 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 websites (club, district, action groups etc), Companies House and information that has been published in articles/newspapers.

#### **Cookies**

Like most websites, we 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 <https://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.

Rotary RIBI may 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 at <http://www.google.com/privacypolicy.html>.

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

### **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 membership, donation or services we provide to you and we promise to keep your information secure. The personal data we will usually collect is:

- Your name
- Your contact details
- Your date of birth
- Your bank or credit card details (as relevant to the service provided)
- Details of the enquiry, service or product

Where it is appropriate, we may also ask for additional information

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

We will use your personal data for the legitimate interest of conducting core business activities, these will include:

- Administer your membership or donation, including processing Gift Aid
- Provide you with the services, products or information you asked for
- Providing services, products, guidance or information to clubs and districts for their general activities, including Disclosure and Barring Service checks
- Communicating organisational messages and information to members, district and club officers
- Facilitate conference, training seminars, meetings and other special event planning
- Supporting *'The Rotarian'* and *'Rotary'* magazines
- Supporting the Rotary Foundation (TRF) and the Rotary Foundation United Kingdom
- Providing information and updates to district and club officers on RI and RIBI programmes and service projects
- Preparation of Rotary Handbooks
- Identifying candidates for Presidential and Foundation appointments to conferences.
- Appointments to committees, club and district offices, task forces and other assignments within the Rotary organisation
- 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 us
- Understand how we can improve our services, products or information
- 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.

## **Under 18's data**

We do not collect information from under 18's except with the specific permission of the youngster and the parents or guardians.

## **Recording Telephone Calls**

If recording is in operation, callers will be informed that their calls are being recorded. We do not record telephone calls as a normal practice.

## **Data Sharing**

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

In the course of our legitimate business 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, for instance:

- Andy Cameron – Web Systems
- Arden Group – IT development, management and support
- Banking organisations – those that provide our banking/payment services
- Contently Limited and Warners – our magazine publishers and distribution providers
- Heart Internet – our RIBI Template database, Data Management System (DMS) and rotarygbi.org secure hosting service provider
- MailChimp – our communication mailing software service provider
- PayPal
- Rotary International

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.

### **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) and the RIBI Donations Trust.

When you give information to us it will be shared within the wider organisation to facilitate your membership or donations and to provide the service afforded to you as part of that membership/donation. We will ensure that data processing agreements, compliant to GDPR, are in place before sharing your data within the wider organisation.

Rotary clubs and districts within Rotary International in Great Britain and Ireland are data processors for some of your personal information associated with your membership and will process your data in accordance with the RIBI privacy notice. Clubs and districts also collect personal data for their individual club and district activities and are therefore also independent data controllers. This means they are also legally responsible for protecting your data under GDPR legislation whilst in their safekeeping and will have their own privacy notices in this respect.

### **2) 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 the police, other agencies, regulatory bodies or our legal advisors.

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

We ensure that there are appropriate physical and technical controls in place to protect your personal details. For example, confidential paper records are securely stored, our online forms are encrypted and our network is protected and routinely monitored. Confidential paper waste is shredded.

We undertake regular reviews of who has access to information that we hold to ensure that your personal information is only accessible by appropriate persons, Rotary members and our service/host providers. 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**

Your personal information will be hosted securely within the UK or the EU by Rotary International in Great Britain & Ireland and our Club

However, Rotary International run its operations outside the European Economic Area (EEA). Although they may not be subject to the same data protection laws as organisations based in the UK, we will take steps to make sure they provide an adequate level of protection in accordance with UK data protection law. By submitting your personal information to us you understand your personal data will be transferred, stored and processed at a location outside the EEA. You can view Rotary International's privacy notice by visiting their website: <https://my.rotary.org/en/privacy-policy>

## **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 enquiry, process your membership, donation, event registration or other services associated to your Rotary membership. There are statutory timescales on how long we should keep your information, for example, gift aid transactions must be retained indefinitely, financial records must be kept for 7 years, information associated with Health & Safety for three years after an event. We shall delete your information according to these statutory limits, or according to guidance issued by the Information Commissioner.

Individual members are responsible for keeping their own personal data up to date and have access to the RIBI Data Management System (DMS) or My Rotary on the RI/RIBI websites for this purpose. In addition, where necessary, we will keep your information accurate and up-to-date.

## **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 <https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/www.dataprotection.ie>

- 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. Members and donors have access to their personal data via self-service systems such as the RIBI Data Management System (DMS) or My Rotary via the RI website. 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 RIBI General Secretary, 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, RIBI 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, for example if you are a valid member we will need to communicate with you about your membership and those services afforded to you as part of that membership; you hold a club or district office and we need to communicate with you in relation to that office, in which case you will not be able to unsubscribe from these 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 reasonable expect us to. You can opt out of our general member mailings at any time.

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 [www.rotarygbi.org](http://www.rotarygbi.org) or by notifying you directly.

### **Our contact details**

George Pigott – Compliance Officer  
3 Ardara Wood, Comber, Newtownards, Co Down, BT23 5UB  
e: [georgejpigott@aol.com](mailto:georgejpigott@aol.com) t: +44 (0) 28 9187 3719 m: +44 (0) 7703594731

### **Complaints**

If you are unhappy with how we have processed your personal information, please firstly contact the Club President 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

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*This document was last reviewed and updated 14th May 2018*