Introduction

Welcome to the Simply Social privacy policy.

Simply Social respects your privacy and is committed to protecting your personal data. This privacy policy will inform you as to how we look after your personal data when you visit our website (regardless of where you visit it from) and tell you about your privacy rights and how the law protects you.

1 Important information and who we are.

Purpose of this privacy policy

This privacy policy aims to give you information on how Simply Social collects and processes your personal data through your use of this website, including any data you may provide through this website and Member Mojo when you apply to become a member or renew your membership.

This website is not intended for children and we do not knowingly collect data relating to children.

It is important that you read this privacy policy together with any other privacy policy or fair processing notice we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This privacy policy supplements the other notices and is not intended to override them.

**Controller**

Simply Social, as the entity responsible for processing your data, may be mentioned as “we”, ”us” “our” or “the Club” in this privacy policy. Simply Social is the Data Controller as defined under Article 4 of the GDPR legislation.

Our full entity name is Simply Social and you may contact us through any of the following methods:

Email: [enquiries@simplysocial.org.uk](mailto:enquiries@simplysocial.org.uk)

Telephone: [07971 427766](https://www.simplysocial.org.uk/Text,%20Phone)

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues (www.ico.org.uk). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

This version was last updated on 22/05/2018. Historical versions may be obtained by contacting us.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

**Third-party links**

This website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy policy of every website you visit.

**2 The data we collect about you**

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together follows:

* Identity Data including first name, last name, Date of Birth
* Contact Data including postal address, email address and telephone numbers
* Transaction data including details about payments from and to you.
* Profile data including information about your Higher Qualifications and your Job/Profession as well as information on your hobbies and interests.
* You may appear in Photos taken by club members which may be submitted to and displayed on our website, the monthly bulletin and Club social media pages.

We also collect, use and share Aggregated Data such as statistical or demographic data for any purpose. Aggregated Data may be derived from your personal data but is not considered personal data in law as this data does not directly or indirectly reveal your identity. For example, we may aggregate Data to calculate statistics on Club events and activities. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy policy.

We do not collect any Special Categories of Personal Data about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data). Nor do we collect any information about criminal convictions and offences.

**3. How is your personal data collected?**

We use different methods to collect data from and about you including through:

* Direct interactions. You may give us your [Identity, Contact Data] by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:
  + Apply for Club Membership
  + Create an Account on Member Mojo
  + Contact the club via Meetup
* Automated technologies or interactions. As you interact with our website, we may automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, [server logs] and other similar technologies. We may also receive Technical Data about you if you visit other websites employing our cookies. Please see our cookie policy [LINK] for further details.
* Actions by other club members. When taking part in club activities, members may share photos or other information of your involvement in such activities and these may be displayed on the Club website and Club social media. Please note that we are not responsible for information submitted to Members’ own social media accounts. Committee members may record information on your behalf such as creation of an account on Member Mojo or information on payments made indirectly. Event organisers may require information from you for the legitimate interests of organisations who provision the event activity.

**4. How we use your personal data**

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

• Where we need to establish your Club Membership

• Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.

• Where we need to comply with a legal or regulatory obligation.

Click below to find out more about the types of lawful basis that we will rely on to process your personal data.

ICO Guidance:

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

Generally we rely on legitimate interest as a legal basis for processing your personal data. We require additional consent to publish your photos and add you to WhatsApp Groups. You have the right to withdraw consent at any time by contacting us.

We may use your Identity and Contact data to:

*Under legitimate interest:*

Register you as a new member

Manage fees, payments and charges

Notify you of changes to our terms or privacy policy

Register you on a Club event

Publicise Club activities on our website or social media

*By Consent:*

Publish photos of including members

Add you to WhatsApp groups.

**Publicity and Mailing lists**

As a member or prospective member you may receive communications from us via email or messaging services like WhatsApp to inform of upcoming Club activities.

You will receive these communications from us if you have requested information from us, applied for membership or become a member of the Club. In each case you will have opted-in to such communications.

**Third-party Marketing**

We would not sign you up to marketing communications from third parties as part of club membership or taking part in an event ran by a third party. We encourage event organisers who need to pass on personal information for a legitimate interest of the third party (e.g. insurance) to ensure that information is not used for other purposes by the third party.

**Opting out**

You can ask us or third parties to stop sending you communications at any time by contacting us or the third party at any time.

Where you opt out of receiving these communications, this will not apply to personal data provided to us through applying for membership or becoming a member.

**Cookies**

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly. For more information about the cookies we use, please view the privacy preferences page on the website.

**Change of purpose**

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

**5.** **Disclosures of your personal data**

We may have to share your personal data with the parties set out below for the purposes set out in the in paragraph 4 above.

* Member Mojo
* Our Social media accounts – Meetup, Twitter, Facebook
* Association of IVCs for inter IVC activities
* Google Analytics

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

**6. International Transfers**

We do not transfer your personal data outside of the European Economic Area (EEA).

**7. Data Security**

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed.

We have put in place procedures to deal with any suspected personal data breach and will notify you and Information Commissioner’s Office of a breach where we are legally required to do so.

**8. Data Retention**

**How long will you use my personal data for?**

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

We keep your personal information for the duration of your Membership with us and delete it no later than 6 months after membership expiry or as soon as possible upon request as described in clause 9.

**9.** **Your legal rights**

Under certain circumstances, you have rights under data protection laws in relation to your personal data. Please click on the links below to find out more about these rights:

* Request access to your personal data.
* Request correction of your personal data.
* Request erasure of your personal data.
* Object to processing of your personal data.
* Request restriction of processing your personal data.
* Request transfer of your personal data.
* Right to withdraw consent.

If you wish to exercise any of the rights set out above, please contact us.

1. **No fee usually required**

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

1. **What we may need from you**

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

1. **Time limit to respond**

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

**10 Glossary**

Non-Member: Anyone who has not registered with CNW-IVC

Prospective Member: Anyone who has attended events but have not formally registered or paid for Club membership

Member: Anyone who has formally registered with the Club on Member Mojo and has paid for Club Membership

Committee Member: An individual elected into their position at the annual AGM and has responsibilities for the operation of the club, roles include but are not limited to the Chair, Treasurer, Secretary, Webmaster.

Event Organiser: Any Member who arranges and invites other Members to take part in an activity and advertises the activity in Club communications.

**YOUR LEGAL RIGHTS**

You have the right to:

Request access to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.

Request correction of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.

Request erasure of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

Object to processing of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

Request restriction of processing of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

Request the transfer of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

Withdraw consent at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.