# SMBP Association 44 Club – Glasgow Branch PRIVACY STATEMENT

# 1 INFORMATION ABOUT YOU

We will collect personal information from you when you enquire about our activities, ask to receive updates on progress or register as a member of SMBP Association 44 Club – Glasgow Branch (the Club). This information may include your name, title, email address, physical address, and telephone number. In addition we hold a record of membership fees and Christmas Lunch payments made.

### 2 OUR USE OF THIS INFORMATION

Your personal information will only be used to process your requests and to provide you with information relating to the business of the Club. When we process your personal data we use the legitimate interests lawful basis. We process data so we can contact you and send out relevant documents and seek your approval on any matter to do with the Club where your approval is required.

## 3 WHO WE SHARE INFORMATION WITH

We do not share any information we hold about you.

## 4 RETENTION OF PERSONAL DATA

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. In some circumstances we may anonymise your personal data so that it can no longer be associated with you, in which case we may use such information without further notice to you. Once you are no longer a member we will securely destroy your personal data.

### 5 AUTOMATED DECISION-MAKING

We do not intend to use automated decision-making in relation to your personal data.

## 6 TRANSFER OF PERSONAL DATA OUTWITH THE EU

It is not envisaged that your personal data will be processed outside of the EEA. If it is we will ensure that we comply with the conditions for transfer set out in Chapter V of the GDPR.

# 7 YOUR RIGHTS IN CONNECTION WITH PERSONAL DATA

Under certain circumstances, by law 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 information we hold about you corrected.
- 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 exercised your right to object to processing.
- 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. You also have the right to object where we are processing your personal data for direct marketing purposes.
- Request the restriction of processing of your personal data. This enables you to ask us to suspend the processing of personal data about you, for example if you want us to establish its accuracy or the reason for processing it.
- Request the transfer of your personal data to another party.

If you want to review, verify, correct or request erasure of your personal data, object to the processing of your personal data, or request that we transfer a copy of your personal data to another party, please contact Elaine Ellen, our Privacy Officer, in writing c/o Little Finnery, Gartocharn, Alexandria, West Dunbartonshire G83 8SA.

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 for access is clearly unfounded or excessive. Alternatively, we may refuse to comply with the request in such circumstances. We may need to request specific information from you to help us confirm your identity and ensure your right to access the information (or to exercise any of your other rights). This is another appropriate security measure to ensure that personal data is not disclosed to any person who has no right to receive it.

## 8 SECURITY

We are required to keep your information accurate and up to date. We need your assistance to do that. We have technical and organisational measures in place and take all reasonable precautions to prevent the loss, misuse or alteration of information you give us. Communications in connection with our activities will be sent by either post or e-mail. You may unsubscribe from our email list at any time by replying to the email and putting "Unsubscribe" as the subject. Please contact us if you do not wish to receive information by post.

25 May 2018