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Updated 24/05/2018

1. INTRODUCTION

On May 25, 2018, a new European Union (EU) data protection law, the General Data Protection Regulation (GDPR), takes effect. The GDPR gives individuals in the EU more control over how their data is used and places certain obligations on the club that process information of their members. We've created a Privacy Policy and internal policies to reflect the new requirements of the GDPR. We've provided additional details about the information we collect and how we use that information. We've also explained your choices and the control you have over your information.

It is necessary for the Treasurer as Data Controller to hold personal data on individual club members for the purpose of completing annual tax forms and for communicating with current group members. The information held includes name, address, home and mobile phone numbers, email address, tax office name, National Insurance number, taxpayers reference, employers reference and a record of holdings in club units and their value. Relevant data is only shared with the tax office and other club members and is held on a password protected personal laptop. Your data will be removed from the records at the end of the tax year following the year you leave the club

2. WHO WE ARE

- a) This privacy notice (the “Privacy Notice”) applies to all members of the Elizabeth Swalocs Investment Club (hereafter referred to as ‘the club’)
- b) Our treasurer is the Data Controller in respect of personal information that we process in connection with the club. In this document references to “we”, “us” or “our” are references to the club.
- c) Our registered address is The Old Police House, 13 Merchant Lane, Cranfield, Beds MK43 0DA. Contact details: Telephone 01234 751660 Email kbskbs@btinternet.com
- d) We respect our members rights to privacy and to the protection of personal information. The purpose of this Privacy Notice is to explain how we use personal information in connection with the business of the club. “Personal information” means information about a living individual who can be identified from that information (either by itself or when it is combined with other information). We may update our Privacy Notice from time to time. When we do we will communicate any changes to you and publish the updated Privacy Notice.

3. THE INFORMATION WE PROCESS

- a) We collect and process various categories of personal information at the start of, and for the duration of, your membership. We will limit the collection and processing of information to information necessary to achieve one or more legitimate purposes as identified in this document. Personal information includes:
 - Full Name
 - Address
 - Email Address
 - Landline number (Telephone)
 - Mobile Telephone number
 - Number of shares (betties) held within the club
 - Value of shares (betties) held within the club
 - Total contributions (monthly and voluntary amounts)
 - Total withdrawals
 - Bank details (TBC)
 - Tax office name
 - National Insurance number
 - Taxpayers reference
 - Employers reference

4. HOW WE OBTAIN INFORMATION

- a) Your information is made up of all the personal information we have requested and hold about you. It includes:
 - information you give to us such as contact details, taxpayers reference etc.,
 - monthly investments made by you, voluntary additional contributions and withdrawals made by you

5. YOUR RIGHTS

- a) We want to make sure you are aware of your rights in relation to the personal information we process about you. We have described those rights and the circumstances in which they apply below.
- b) If you wish to exercise any of these rights, if you have any queries about how we use your personal information that are not answered here, or if you wish to complain to our Data Controller, please contact us on 01234 751660 or Email kbskbs@btinternet.com.
- c) Please note that in some cases, if you do not agree to the way we process your information, it may not be possible for you to continue to be a member of the club.

Access – You have a right to get access to the personal information we hold about you. If you would like a copy of the personal information we hold about you, please contact us on 01234 751660 or Email kbskbs@btinternet.com.

Rectification – You have a right to rectification of inaccurate personal information and to update incomplete personal information. If you believe that any of the information that we hold about you is inaccurate, you have a right to request that we restrict the processing of that information and to rectify the inaccurate personal information.

Please note that if you request us to restrict processing your information, it may not be possible for you to continue to be a member of the club.

Erasure – You have a right to request that we delete your personal information.

You may request that we delete your personal information if you believe that:

- we no longer need to process your information for the purposes for which it was provided
- we have requested your permission to process your personal information and you wish to withdraw your consent; or
- we are not using your information in a lawful manner.

Please note that if you request us to delete your information it may not be possible for you to continue to be a member of the club.

Restriction – You have a right to request us to restrict the processing of your personal information. You may request us to restrict processing your personal information if you believe that:

- any of the information that we hold about you is inaccurate;
- we no longer need to process your information for the purposes for which it was provided, but you require the information to establish, exercise or defend legal claims; or we are not using your information in a lawful manner.

Please note that if you request us to delete your information it may not be possible for you to continue to be a member of the club.

Portability – You have a right to data portability.

Where we have requested your permission to process your personal information or you have provided us with information for the purposes of becoming a member of the club, you have a right to receive the personal information you provided to us in a portable format.

You may also request us to provide it directly to a third party, if technically feasible. We're not responsible for any such third party's use of your account information, which will be governed by their agreement with you and any privacy statement they provide to you.

If you would like to request the personal information you provided to us in a portable format, please contact the Data Controller on 01234 751660 or Email kbskbs@btinternet.com.

6. HOW WE USE AND SHARE YOUR INFORMATION WITH THIRD PARTIES.

- a) We will only use and share your information where it is necessary for us to lawfully carry out our club activities.
- b) Sharing with third parties
We will not share your information with anyone outside of the club except where we have your permission;
 - where required for servicing your membership
 - where we are required by law and by the bank, broker, government agencies (HMRC), tax authorities
 - with your bank(s) where required by law to help recover funds that have entered your account because of a misdirected payment

Objection – You have a right to object to the processing of your personal information.

You have a right to object to us processing your personal information (and to request us to restrict processing). Please note that if you object to the processing of your information it may not be possible for you to continue to be a member of the club.

Marketing – You have a right to object to direct marketing.

You have a right to object at any time to processing of your personal information for direct marketing purposes.

Withdraw consent – You have a right to withdraw your consent.

Where we rely on your permission to process your personal information, you have a right to withdraw your consent at any time. We will always make it clear where we need your permission to undertake specific processing activities.

Lodge complaints – You have a right to lodge a complaint to our Data Controller who will investigate the matter. We hope that we can address any concerns you may have, but you can always contact the Information Commissioner’s Office (ICO).

(For more information, visit ico.org.uk)

Please note that the club will not share your information with third parties for their own marketing purposes without your permission.

7. COMMUNICATIONS ABOUT YOUR MEMBERSHIP

We will contact you with information relevant to the operation and maintenance of your membership (including updated information about how we process your personal information), by a variety of means including email, text message, post and/or telephone.

If at any point in the future you change your contact details, you should tell us promptly.

8. HOW LONG WE KEEP YOUR INFORMATION

Your data will be removed from the general club records at the end of the tax year following the year you leave the club. Your data will then be stored on an archive database for 7 years for possible tax investigation purposes.