

Privacy Notice (previously known as a Fair Processing Notice)

Your information and what you should know

We are the Sutton and Cheam Radio Society (the society / we) which was founded in 1946 and are affiliated society of the Radio Society of Great Britain (RSGB) based in the London Borough of Sutton and are the Data Controller, and we can be contacted at info@scrs.org.uk.

Please note that email sent to the above address will not be secure in transit.

How we use your information (Purpose of processing)

We collect key information about members, prospective members of the society and those that provide services or assistance to the society. This information is maintained on paper and in electronic records.

All information is held in accordance with the principles of the Data Protection Act.

Why do we hold your information?

Information about you and others as above is used by the society to run the society in the following ways:

- Manage the society,
- Keep track of who has paid their subscription,
- Inform members of events and activities,
- Carry out surveys,
- Help investigate untoward incidents, complaints or legal claims,
- Provide training courses.

The lawful basis of the processing

The society processes (uses) personal information only when it has a legal basis for doing so.

The primary purpose for which the society processes personal information is in order to run the society for its members.

The basis for the society processing your information is described in Article 6 (Lawfulness of processing) and Article 9 (processing of special categories of personal data) of the General Data Protection Regulation.

The legal basis for using your data will depend on what the society needs to do but includes:

6(1)(f) '...legitimate interests...except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject...'

6(1)(a) Consent

6(1)(c) '...necessary for compliance with a legal obligation to which the controller is subject or:

6(1)(d) '...necessary in order to protect the vital interests of the data subject or of another natural person' and

For safeguarding

9(2)(b) '...is necessary for the purposes of carrying out the obligations and exercising the specific rights of the controller or of the data subject in the field of ...social protection law in so far as it is authorised by Union or Member State law..'

under the General Data Protection legislation.

9(2)(b) '...is necessary for the purposes of carrying out the obligations and exercising the specific rights of the controller or of the data subject in the field of employment...social protection law in so far as it is authorised by Union or Member State law..'

For disclosure and barring service (DBS) checks the society will process under Article 10 of the GDPR and the Safeguarding Vulnerable Groups Act 2006.

For a contract

Article 6(1)(b) is necessary for a contract where the individual has a contract with the society or because the individual has asked the society to take specific steps before entering into a contract.

Where the terms below used in the above mean:

Consent: the individual has given clear consent for the society to process their personal data for a specific purpose.

Contract: the processing is necessary for a contract the individual has with the society, or because they have asked the society to take specific steps before entering into a contract.

Legal obligation: the processing is necessary for the society to comply with the law (not including contractual obligations).

Vital interests: the processing is necessary to protect someone's life.

Categories of personal data

Special category data

- Special category data is personal data which the GDPR says is more sensitive (very like sensitive data under the DPA 1998), and so needs more protection.
 - Health which includes information on disabilities

Special category data will be processed under an Article 6 and Article 9 lawful basis.

What information may the society hold about our members and others?

Members and Others

We hold details about you, such as your address (including correspondence address), telephone numbers, date of birth, “next of kin” that is who to contact in an emergency.

It is your responsibility to ensure the society has up to date information for you.

This information may include:

- your name, address and contact details, including email address and telephone number, date of birth and gender
- start of membership date and when applicable the date of leaving the society.
- next of kin and emergency contacts;
- warnings issued to you and related correspondence;
- call Sign(s)

Together with this information, we also hold other details about you, which you may have been provided or may have been given to us by other organisations or public sources which may include:

- Preferred name or maiden name
- Child protection / Adult protection status
- IP Address

The society may collect this information in a variety of ways. For example, data might be collected through application forms, your passport or other identity documents such as your driving license; from correspondence with you or given at meetings.

The recipients of your data and those that provide us with data about you

Who do we share information with?

We will not share information with anyone else except where:

It is required by law, for example, to comply with a court order.

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It is to protect the safety of yourself or others, for example with:

- Ambulance services
- Police forces
- The Health and Safety Executive

The source of personal data where we do not obtain it from you

We may obtain your personal information from you the data subject and others such as referees.

Social Media

When you use our website or interact with our social media presence (e.g. Twitter, Instagram and Facebook) your data (e.g. comments, likes, reviews) may be visible to providers of social networking services and their users.

We suggest that you review the privacy and security settings of your social media accounts to ensure you understand how your data maybe shared and used.

Information on visitors to the website are collected by Google Analytics which collects information on pages visited, length of visit, URL and search terms of referring sites, your browser's capabilities, and your IP address. Google will not associate this with any other data held by Google. You can opt out of Google Analytics with their [opt-out browser](#)

[add-on \(opens in a new window\)](#) or any of a number of third party privacy extensions for your browser.

We do analyse the server log files which contain details of the Internet address (IP address) of computers using the site, pages looked at, the times of day and the type of web browser used. None of this information is linked to individuals.

Automated decision-making and profiling

The society does not carry out automated decision making.

Transfers of your information to third countries or international organisations

It may sometimes be necessary to transfer personal information overseas. When this is needed information is only transferred to countries within the European Economic Area (EEA) unless additional safeguards have been put in place to protect your information.

Any transfers made will be in full compliance with all aspects of the Data Protection Act.

How long do we hold your information for?

The society will retain information about you (the data subject) for as long as you remain a member of the society and longer if necessary.

How can you access (get a copy of) your information?

Subject Access

You have the right to see or have a copy of your personal information.

You do not need to give a reason; and normally there will be no charge.

We may charge a 'reasonable fee' when a request is manifestly unfounded or excessive, particularly if it is repetitive.

We may also charge a reasonable fee to comply with requests for further copies of the same information at £0.10 per side of A4 paper.

If you want to obtain a copy of your information you should make your request to the society via the society's email address info@scrs.org.uk.

We will normally provide your information within one month (4 weeks) of receiving all the information we need to respond to your request. If maybe that we have to extend the time period by a further 2 months (8 weeks) if your request is complex, numerous or large. We will inform you within the month of receipt if this is the case and explain why the extension is necessary.

Before providing any information we will need to verify your identity and may request further information from you so we may progress your query as quickly as possible.

Your rights in respect of restricting our processing of your information

- **Your right to be informed:**

This means you have a right to be informed about the way we collect and use your data (this privacy notice).

- **Your right to rectification:**

This means you have the right to have inaccurate (incorrect or misleading as to any matter of fact) personal data corrected or completed.

- **Your right to have your personal information erased**

This right is not absolute and only applies in certain circumstances.

You can request either in writing to the societies email address or verbally to a committee member to have your information erased. We will respond to your request within one month.

When does the right to erasure not apply?

- to comply with a legal obligation;
- for archiving purposes in the public interest, scientific research historical research or statistical purposes where erasure is likely to render impossible or seriously impair the achievement of that processing; or
- for the establishment, exercise or defence of legal claims.

If the society considers that a request is manifestly unfounded or excessive we can:

- request a "reasonable fee" to deal with the request; or
- refuse to deal with the request

The fee will be the reasonable fee for the administrative costs of complying with your request.

- **The right to erasure applies if:**

Your personal data is no longer necessary for the purpose which we originally collected or processed for;

- We are relying on consent as your lawful basis for holding the data, and you withdraw your consent;
- We are relying on legitimate interests as our basis for processing, you object to the processing of your data, and there is no overriding legitimate interest to continue this processing;
- We are processing the personal data for direct marketing purposes and you object to that processing;
- We have processed your personal data unlawfully, or we have to do it to comply with a legal obligation; or
- We have processed the personal data to offer information society services to a child

- **Your right to Restrict processing:**

This means that you can request the processing of your data is blocked and your data stored separately.

- You may request a restriction verbally or in writing. This is not an absolute right and will depend on the circumstances of your request.
- The length of time the restriction will apply for will depend on the circumstances of your request.
- If you restrict our processing of your data we are permitted to store the personal data, but not use it.
- We will respond to your request within one calendar month.

You have the right to restrict the processing of your information in the following circumstances:

- You contest the accuracy of your personal data and we are verifying the accuracy of the data.
- We no longer need the personal data but you need to keep it in order to establish, exercise or defend a legal claim; or
- You have objected to the society processing your data under Article 21(1), and The society is considering whether the society legitimate grounds override yours (the individual).

- **How might we restrict processing?**

We may:

- Temporarily move the data to another processing system;
- Make the data unavailable to users; or
- Temporarily remove published data from a website.

- **When will a restriction be removed?**

Once we have made a decision on the accuracy of the data, or whether our legitimate grounds override those of the individual, we may decide to lift the restriction. We will inform you before we lift the restriction.

- **Your right to data portability**

This means that you can request a secure transfer of your data to another Data Controller.

The right to data portability only applies when:

- the data is about you and that it was provided by you to the society.
- where the processing is based on your consent or for the performance of a contract; and
- when processing is carried out by automated means

See the section on how to access your information (subject access).

- **Your Right to object**

This means that you have the right to object to the society processing your data where the processing is based on:

- Processing is based on legitimate interests or the performance of a task in the public interest/exercise of official authority (including profiling);

- direct marketing (including profiling); and
- processing for purposes of scientific/historical research and statistics.

You must have an objection on “grounds relating to your particular situation”

We will stop processing your information unless:

- We can demonstrate compelling legitimate grounds for the processing, which override your interests, rights and freedoms; or
- the processing is for the establishment, exercise or defence of legal claims.

- **Your right to withdraw your consent**

This means that once you have given your explicit consent for your information to be processed you have the right to:

- Withdraw your explicit consent for the processing of your information.
- Withdrawal can be verbally to a committee member in writing to the society’s email address.

- **Your right to complain to the regulator**

Details on how you can do this are included further down the page.

If you email us

Please note that we may use email monitoring or blocking software.

You have a responsibility to ensure that any email you send to us is within the bounds of the law.

Please note that emails sent to us may not be secure in transit, we cannot take any responsibility for the security of your email before it is received by the society and we may choose not to reply via email if we have concerns regarding confidentiality and/or security.

If you email us or give us your email address then you accept that we may communicate with you via email.

Email is not a guaranteed delivery service - if your communication is important please confirm we have received it by other means.

It is your responsibility to ensure we up to date contact details for you.

Complaints or queries and your right to complain to the Regulator

For further information or to make a complaint, please contact the society via its email address or give your complaint to committee member in writing.

Email: info@scrs.org.uk.

If you feel that we have not adequately dealt with your complaint regarding how we process your information you can raise the issue with the Information Commissioner who is the supervisory authority for the United Kingdom (the Regulator) at the address below:

Information Commissioner's Office

By phone: 0303 123 1113

By letter:

Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

By email casework@ico.org.uk

<https://ico.org.uk/>

Document Version:

Date: