



thecockburn**association**

General Data Protection Regulation

PRIVACY NOTICE

Background

The Cockburn Association is committed to processing data in accordance with its responsibilities under the EU General Data Protection Regulation (GDPR) 2018. The privacy of our members, supporters and others whose data we hold is important to APRS. For the purposes of this legislation, The Cockburn Association is a Data Controller. The Director of the Association acts as the designated Data Controller who has overall responsibility for ensuring that the organisation complies with the legislation.

Type/classes of data we hold

We process information which may include:

- personal details (name, address, email, telephone etc.)
- membership details
- financial details
- visual images

How we use data

In line with our registration with the Information Commissioner's Office, we process personal data to enable us to:

- provide a membership service to our members
- further our charitable purposes as specified in our constitution;
- administer membership records;
- fundraise and promote the interests of the charity;
- manage our employees and volunteers;
- maintain our own accounts and records.

Who is collecting data

Any member of The Cockburn Association's staff, office bearer or volunteer may collect personal data during their course of their work via interactions with members, supporters and representatives of other organisations.

Legitimate interest

Under the new legislation, The Cockburn Association has sought to obtain opt-in consents for all members for the purposes for which we use data. In addition, the Association has a 'legitimate interest' to process personal data for the purposes of meeting our charitable purposes (Article 6(1)(f) of the GDPR). For example, we undertake to keep members and supporters informed of our work via publications and email alerts as we believe they would expect us to do so. In addition, members can opt in to receive information from kindred organisations if deemed relevant to our charitable purposes (eg a lecture from a local heritage group).

Disclosing personal data

The Cockburn Association will never disclose personal data to anyone outside of the Association except where we have consent or are required to do so by law. For clarification, personal data is used solely to further the work of the organisation. It will not be used for any direct marketing purposes. The Association will not hold or process sensitive classes of information on its members or supporters. We may need to hold such information on staff and volunteers if that data is important to ensuring the health and well-being of staff or volunteers.

Storage of data

All personal data held by The Cockburn Association is held securely and will be retained for no longer than is necessary to provide our services. The Association keep personal information as up to date as possible and request that members and supporters contact the office if they believe any information is inaccurate.

Accessing personal data

Under the GDPR, individuals have the right to:

- confirm that their data is being processed;
- access to their personal data; and
- access to other supplementary information held.

If members and supporters wish a copy of the personal information the Association holds, they can do so by contacting the Data Controller of the Cockburn Association at its office.

Rectifying information

Individuals have the right to have inaccurate personal data rectified and this can be done by contacting the APRS office³.

Right to Erasure

Individuals have the right to have personal data erased. Requests for eraser should be made to the Data Controller of The Cockburn Association. The Association will erase personal data if it is not in its legitimate interests to hold it.

Review

The Cockburn Association will keep its Data Protection Policy under annual review. This is a responsibility of the Council of the Cockburn Association, who may delegate to committee of the Association.

25 May 2018