

STEVE GRUNDY, SECRETARY, THE DERBY MAGIC CIRCLE,

# DERBY MAGIC CIRCLE PRIVACY POLICY DOCUMENT GENERAL DATA PROTECTION REGULATION (GDPR)

## **INTRODUCTION**

The Derby Magic Circle (DMC) is committed to the security and protection of Members personal data. This Privacy Policy covers any data we collect from the membership or that which is provided to us and the processing of that data.

By providing us with your personal data, you are accepting and consenting to the practices and regulations covered by this Policy. The (GDPR) allows you to consent to your personal information being held and processed as specified in this document and for the DMC to process the information in the ways that would be reasonably expected in order to fulfil the legitimate interests of the Circle and its members with the minimum impact on privacy. The DMC takes responsibility for ensuring members rights and interests are fully considered and protected with the data being stored and used in accordance with this Policy.

## **INFORMATION**

We may collect information from the membership application form or correspondence to us by e-mail, post or telephone. Information may also be provided about potential new members being introduced to the Circle.

The Circle, may arrange for photographs or videos to be taken of the Circle's activities for publication through the website or social media channels to promote the Circle.

We hold the following information:-

- . Full Name
- . Date of Birth
- . Address
- . E-Mail Address
- . Telephone Contact Number
- . Date of Membership

This information will be store for seven years after membership has terminated.

We require this information to contact members regarding welfare notices, Circle events and other matters within the Circle's membership information.

If, at a later date you decide to withdraw your consent to the use of your contact details being published, it will not be possible to remove your printed details until such time as the next edition being issued.

# **SECURITY**

We aim to take all reasonable precautions to protect your personal data. Where hard copy is used, this is securely locked away. Any electronic devices used to process this data has up to date anti-virus software and has password protection. All data we collect is stored on secure password protected facilities.

# **DISCLOSURES**

We will not sell or rent your personal information for marketing purposes or financial gain.

We may share your personal data with analytical personal or search engine providers who may assist us in the optimisation of our website or membership directory.

We will not divulge your personal information to any other third party, for whatever reason without your prior specific consent.

# YOUR LEGAL RIGHTS

- (1) You have the right to request how your personal data is being processed.
- (2) You have the right to request a copy of your personal data.
- (3) You have the right to request that any inaccurate personal data is immediately corrected.
- (4) You have the right to raise an objection about how your personal data is processed.
- (5) You have the right to request that your personal data is erased if there is no longer any justification for its use.
- (6) You have the right to ask that the processing of your personal data is restricted in certain circumstances.
- (7) You have the right of appeal to the Information Commissioner's Office (https://ico.org.uk)

# **CHANGES TO PRIVACY POLICY**

In the future, this Privacy Policy may be subject to change. In the event of this happening, the "last updated" date will also be changed. Furthermore, the changes will be effective immediately.

## **FURTHER INFORMATION**

The controller for personal data is the Secretary of DMC. If you have any questions regarding any statements included in this Policy, initial contact should be through the DMC Secretary.

# **CONSENT**

The GDPR has a number of key areas that give guidance to Associations to prepare a Policy Document and to obtain consent to use personal data.

I have attempted to steer this Policy to as close to these key areas as possible, although practicality and strict abidance to the Regulations is often difficult.

I have listed the main key areas that I have deviated from the GDPR for the above reasons but feel they need mentioning so we are aware of these deviations.

Explicit consent requires a very clear and specific statement of consent and requires a positive opt-in and not to use pre-ticked boxes or any other method of default consent.

### **DMC Policy:-**

We have notified the membership of GDPR and used and opt-out action policy. Although an opt-in paragraph is included in the current Application Form but is applicable to new members only.

Keep the Consent separate from other terms and conditions.

#### DMC Policy:-

Our Consent is included with other conditions included in the Application Form.

Be Clear and Concise, vague or blanket consent is not good enough.

#### **DMC Policy:-**

We use a blanket term of Personal Data to cover all data collected. Although we are specific in our Policy Document.

Avoid making Consent a precondition of service.

#### **DMC Policy:-**

It could be said that including consent with the Application Form it is a prerequisite to membership.

Although the Policy Document goes some way to satisfying the GDPR requirements, we could be accused of steering the Document to suit the process within the DMC and not strictly abiding to the spirit of the Privacy Policy.

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