



Submariners Association
DATA PRIVACY POLICY

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[Compliant with the General Data Protection Regulation 2018 (GDPR)]

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Version Control

Version 1	24/5/2018	Written by	Stuart Brown
Version 2	25/5/2018	Updated by	David Woolterton

DATA PRIVACY POLICY

[Compliant with the General Data Protection Regulation 2018 (GDPR)]

The Submariners Association (SA)

The SA is committed to maintaining full compliance with EU General Data Protection Regulation 2018 (GDPR) legislation for the processing, control, storage and destruction of members personal data.

(This 'Data Privacy Policy' is supplemented by a 'Website Privacy Notice' specifying control of data on the SA Website).

1. Personal data – what is it?

Personal data relates to a living individual who can be identified from that data. Identification can be by the information alone or in conjunction with any other information in the data controller's possession or likely to come into such possession. The processing of personal data is governed by GDPR.

2. Who are we?

We are the Submariners Association (SA), The National Management Committee (NMC) of the SA is the designated 'Data Controller' for the SA which means it decides how our members personal data is processed and for what purposes and by whom. The data is only processed by the minimum number of NMC members necessary.

3. How do we process our members personal data?

The Submariners Association complies with its obligations under the "GDPR" by keeping personal data up to date; by storing and destroying it securely; by not collecting or retaining excessive amounts of data; by protecting personal data from loss, misuse, unauthorised access and disclosure and by ensuring that appropriate technical measures are in place to protect personal data.

We use members personal data for the following purposes: -

- To administer membership accounts and records;
- To share members, contact details with the Branch structure of the Submariners Association for the purpose of maintaining the integrity of the National Membership Database;
- To enable us to contact members regarding branch matters;
- **Branches use members information to share news, events, activities and services that will be occurring in the association and in which members may be interested.**

4. What is the legal basis for processing personal data?

- The explicit consent for the use of personal data must be obtained from members to enable the SA to keep them informed about news, events, activities and services. **(The NMC only passes this type information via the Branch Secretary, so branches will need to put something in place for this.)**
- Processing of members personal data should only be carried out by the minimum number of NMC members / Branch Officials as necessary: -
 - the processing relates only to members or former members; and
 - there will be no disclosure to a third party without explicit consent.

5. Sharing personal data

Members personal data will be treated as strictly confidential and will only be shared with the Branch Officials of the Association in accordance with the Associations requirements. We will not otherwise share members data with third parties outside of the SA except if required by law.

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6. How long do we keep personal data1?

We keep members personal information in line with our data retention policy.

This means that we will remove data which we have collected directly from members held on our systems after a period of 12 months after they have been made a non current member of the Association, (this period typifies the maximum length of time that we may be seeking to confirm members continued membership or to collect annual membership subscriptions). We will also delete members data if specifically requested to do so (see members rights regarding their personal data at section 7 below).

7. Members rights and their personal data

Unless subject to an exemption under the GDPR, members have the following rights with respect to their personal data: -

- The right to request a copy of their personal data which the Submariners Association NMC / Submariners Association Branch holds about themselves;
- The right to request that the Submariners Association corrects any personal data if it is found to be inaccurate or out of date;
- The right to request their personal data is erased where it is no longer necessary for the Submariners Association to retain such data;
- The right to withdraw their consent to the processing at any time;
- The right, where there is a dispute in relation to the accuracy or processing of a member's personal data, to request a restriction is placed on further processing;
- The right to object to the processing of personal data, (where applicable);
- The right to lodge a complaint with the government Information Commissioners Office (ICO);

8. Further processing

If we wish to use members personal data for a new purpose, not covered by this policy, then we will provide members with a new notice explaining this new use prior to commencing the processing and setting out the relevant purposes and processing conditions. Where and whenever necessary, we will seek members prior consent to the new processing.

9. Data Breach

If there is found to be a breach in the security of the personal data held by the NMC or any Branch this must be recorded and those members whose data is affected must be contacted and informed immediately. Any breach of a serious nature must be reported to the ICO.

10. Contact Details

To exercise all relevant rights, queries of complaints, in the first instance members should contact the SA National Secretary at secretary@submarinersassociation.co.uk.

Members can ultimately contact the UK Information Commissioners Office on 0303 123 1113 or via email <https://ico.org.uk/global/contact-us/email/> or at the Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire. SK9 5AF.