

# Newtown Twinning Association Privacy Policy 2018

## Who we are:

We are the Newtown Twinning Association, **registered address**;

We are classed under the GDPR regulations as a data controller. That means we decide how your personal data we receive is processed and for what purposes.

## Purpose:

Newtown Twinning Association values the right to privacy and is committed to ensure all personal data is obtained, processed and used in a safe, secure, ethical and transparent way. Your privacy is important to us, and we appreciate your trust that we will use your personal data both carefully and sensibly, in conformity with the principles laid out in this Privacy Policy.

This Privacy Policy is meant to help you understand what personal data we collect about you, why we collect it, and what we do with it. References to personal data in this Privacy Policy include any information which directly or indirectly identifies you, such as your name, surname, e-mail address, telephone number contact details and information contained within membership application/hosting forms.

As your data controller, we determine why and how we process your personal data. This privacy policy outlines which personal data we collect about you (Who, Why, What and How), what legal grounds we rely on to collect your personal data (Lawful Basis), how we protect your personal data and to whom we disclose your personal data (Storage, Security, Duration and Sharing). In addition, we also define for how long we need to keep your personal data and which measures we adopt in order to securely and permanently remove your personal data when the right time comes (Individual's Rights).

## Who Controls:

Newtown Twinning Association is the controller of the personal data you submit to us and is responsible for the processing of your personal data under the applicable data protection legislation. The individual who will have responsibility for the storage, security, sharing and duration of the data will be the **Association Secretary** (contact details below). Although we are technically considered 'data controllers', the ultimate control over your personal data remains with you at all times.

## Why and What Collected and How Used:

### 1. Why -

Because data privacy is of high importance for us, we intend to remain open and transparent about how we use your personal data. Newtown twinning Association will only collect your personal data where necessary to conduct our normal twinning business. We obtain information from you through membership applications, donations, hosting arrangements, use of our website and when you register to receive our regular newsletters.

## **2. What -**

The personal information we collect might include your name, address, email address, phone number, IP address, and information regarding the arrangements for the hosting of members of Les Herbiers Twinning Association or their guests.

## **3. How -**

We may use your information to:

- process applications or renewal of membership of Newtown Twinning Association,
- seek your views or comments on routine twinning business,
- notify you of events,
- send you copies of our newsletter
- send you communications which you have requested and that may be of interest to you, these may include newsletters, information about campaigns, appeals, and other fundraising activities;
- provide you with information on activities,
- send you additional information on routine twinning business,
- notify you of changes and,
- To provide you with the best possible service.

We review our retention periods for personal information on a regular basis. We will hold your personal information on our systems for as long as is necessary for the relevant activity, or as long as is set out in any relevant contract you may hold with us.

## **Lawful Basis:**

Under the applicable data protection legislation, personal data may only be collected and processed based on a limited number of legal grounds. At Newtown Twinning Association, we rely on the following ground to process your personal data:

### **1. Legitimate interest**

In arriving at this decision Newtown Twinning Association has conducted a purpose, necessity and balancing test. We have reviewed how we process your personal data against the following criteria;

- *Why do we need to hold and process personal data?*
- we do this to achieve our legitimate interest of conducting twinning business
- *Who benefits and why?*
- all members of Newtown Twinning Association in that they can participate in the twinning process
- *Does processing help further the interest?*
- yes - processing is reasonably needed to efficiently and effectively conduct twinning business
- *Is this a reasonable way to go about it?*
- yes - given the numbers of members involved
- *What is the relationship between Newtown Twinning Association and its members?*
- open, transparent and as an association only, there is no commercial relationship
- *Is the data particularly sensitive or private?*

- not as defined by GDPR
- *Would people expect data to be used in this way?*
- yes - in today's modern age the use of electronic communications is well established
- *Is Newtown Twinning Association prepared to explain this to members?*
- yes - members are aware of this privacy policy and how data is gathered, stored, secured and processed
- *Are members likely to object or find this intrusive?*
- no - as their rights and entitlements to how their personal data is used has been fully explained

## **Storage, Security, Duration and Sharing:**

Newtown Twinning Association is committed to the processing of your personal data in a lawful, fair and transparent manner. Accordingly, we will only use your personal data if we have a valid reason for doing so and provided you have been informed of the processing purposes beforehand, at the time we collected your personal data.

Moreover, Newtown Twinning Association guarantees that any processing of your personal data will be limited to what is necessary, adequate and relevant in order to achieve the purposes for which personal data is collected.

Because the protection of your personal data is of the utmost importance to us, Newtown Twinning Association is also dedicated to protect your personal data and the systems it is held in. We have defined and implemented adequate technical and organisational measures against any unauthorised access, unlawful use, accidental loss, corruption or destruction. This way, Newtown Twinning Association is confident that your personal data will be processed on a strictly 'need to know basis', when and where appropriate and necessary.

Where you have consented to share photos, recordings, videos and other materials with Newtown Twinning Association, the terms of such consent will provide Newtown Twinning Association with the right to use them in promotions now and for a reasonable period in the future on our website, social media pages and any other promotional channels. You are free to withdraw such consent at any time by contacting us and providing a description of the material in question.

As we are fully aware threats evolve and diversify and we wish to sustain your trust throughout the years, we regularly review and update our security measures and infrastructure, with a view to mitigate operational risks and maintain our security programs up to the latest industry-accepted standards and best practices.

As a general rule, Newtown Twinning Association will only keep your personal data for as long as necessary to fulfil the purpose for which we initially collected it. We will retain your personal data so long as you remain a member of Newtown Twinning Association or if you ask in writing that we delete it.

It is also very important to note:

- We will not sell or rent your information to third parties.
- We will not share your information with third parties for marketing purposes.

***Don't know if this would be relevant in respect of our website - Andrew could you assist do you know if the website run by council uses 'cookies'? If so below could then be inserted.***

*Like many other websites, the BBKA website uses cookies. 'Cookies' are small pieces of information sent by an organisation to your computer and stored on your hard drive to allow that*

website to recognise you when you visit. They collect statistical data about your browsing actions and patterns and do not identify you as an individual. For example, we use cookies to store your country preference. This helps us to improve our website and deliver a better more personalised service.

It is possible to switch off cookies by setting your browser preferences. For more information on how to switch off cookies on your computer, visit our full cookies policy. Turning cookies off may result in a loss of functionality when using our website.

## Individual's Rights:

Your personal data is protected under data protection laws and you have a number of rights (explained below) which you can seek to exercise. Please contact us using the details shown below if you wish to do so, or if you have any queries in relation to your rights. If you seek to exercise your rights we will explain to you whether or not the right applies to you; these rights do not apply in all circumstances.

- **Right of access** – You have a right to access the personal data we hold about you upon request. This is known as a "Data Subject Access Request". You can exercise this right by making a request in writing, by email or by telephone using the contact details in the contact section below.
- **Right of rectification** – You can ask us to correct or update your information to ensure it is accurate and complete.
- **Right to erasure and right to restrict processing** – You can ask us to stop processing and to delete your data in certain circumstances (for example where it is processed with your consent or it is no longer necessary for us to process it).
- **Right to data portability** – You have a right to ask us to provide you with information in a form that suits you, and/or to provide your information to a third party.
- **Right to object** – You have a right to object to our processing of your information.

## Contact Details:

***newtowntwinning@gmail.com***