

# **The Old Dartmothians' Association - Website Privacy Notice.**

This is the privacy notice of 'The Old Dartmothians' Association'. In this document, "we", "our", or "us" refers to The Old Dartmothians' Association.

We are a voluntary not for profit community organisation, our current registered contact address is via the Secretary, as set out in the "Committee" page of our website.

## **Introduction**

This privacy notice aims to inform you about how we collect and process any information that we collect from you, or that you provide to us. It covers information that could identify you ("personal information") and information that could not. In the context of the law and this notice, "process" means collect, store, transfer, use or otherwise act on information. It tells you about your privacy rights and how the law protects you.

We are committed to protecting your privacy and the confidentiality of your personal information. Our policy is not just an exercise in complying with the law, but a continuation of our respect for you and your personal information.

We undertake to preserve the confidentiality of all information you provide to us, and hope that you reciprocate.

Our policy complies with the Data Protection Act 2018 (Act) accordingly incorporating the EU General Data Protection Regulation (GDPR).

The law requires us to tell you about your rights and our obligations to you in regards to the processing and control of your personal data. We do this now, by requesting that you read the information provided at <http://www.knowyourprivacyrights.org>

Except as set out below, we do not share, or sell, or disclose to a third party, any information collected through our website.

## **1. Data we process**

We may collect, use, store and transfer different kinds of personal data about you. We have collated these into groups as follows:

Your identity includes information such as first name, last name, title, date of birth, and other identifiers that you may have provided at some time.

Your contact information includes information such as billing address, delivery address, email address, telephone numbers and any other information you have given to us for the purpose of communication or meeting.

Technical data includes you internet protocol (IP) address, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access this website.

We may aggregate anonymous data such as statistical or demographic data for any purpose. Anonymous data is data that does not identify you as an individual. Aggregated data may be derived from your personal data but is not considered personal information in law because it does not reveal your identity.

For example, we may aggregate profile data to assess interest in a product or service.

However, if we combine or connect aggregated data with your personal information so that it can identify you in any way, we treat the combined data as personal information and it will be used in accordance with this privacy notice.

## **2. Special personal information**

We do not collect any special personal information about you.

## **3. If you do not provide personal information we need**

Where we need to collect personal data by law, or under the terms of our membership application, and you fail to provide that data when requested, we may not be able to grant you membership of our organisation. In that case, we may have to stop providing a service to you. If so, we will notify you of this at the time.

## **The bases on which we process information about you**

The law requires us to determine under which of six defined bases we process different categories of your personal information, and to notify you of the basis for each category. If a basis on which we process your personal information is no longer relevant then we shall immediately stop processing your data. If the basis changes then if required by law we shall notify you of the change and of any new basis under which we have determined that we can continue to process your information.

## **4. Information we process because we have a contractual obligation with you**

When you become a member of our organisation, and buy a product or service from us, or otherwise agree to our terms and conditions, a contract is formed between you and us. In order to carry out our obligations under that contract we must process the information you give us. Some of this information may be personal information.

We may use it in order to:

- verify your identity for membership purposes
- sell products to you
- provide you with our services
- provide you with suggestions and advice on products, services and how to obtain the most from using our website

We process this information on the basis there is a contract between us, or that you have requested we use the information before we enter into a legal contract. We shall continue to process this information until the contract between us ends or is terminated by either party under the terms of the contract.

## **5. Information we process with your consent**

Through certain actions when otherwise there is no contractual relationship between us, such as when you browse our website or ask us to provide you more information about our organisation, including our products and services, you provide your consent to us to process information that may be personal information.

Wherever possible, we aim to obtain your explicit consent to process this information, for example, by agreement via our membership application form or by asking you to agree to our use of cookies on the website. We do not pass your name and contact information to any other source outside of our organisation.

We continue to process your information on this basis until you withdraw your consent or it can be reasonably assumed that your consent no longer exists.

You may withdraw your consent at any time by instructing our secretary who can be contacted via the details on the “Committee” page on our website.

## **6. Information we process for the purposes of legitimate interests**

We may process information on the basis there is a legitimate interest, either to you or to us, of doing so. Where we process your information on this basis, we do after having given careful consideration to:

- whether the same objective could be achieved through other means
- whether processing (or not processing) might cause you harm
- whether you would expect us to process your data, and whether you would, in the round, consider it reasonable to do so

For example, we may process your data on this basis for the purposes of:

- record-keeping for the proper and necessary administration of our organisation
- responding to unsolicited communication from you to which we believe you would expect a response
- protecting and asserting the legal rights of any party
- insuring against or obtaining professional advice that is required to manage organisational risk
- protecting your interests where we believe we have a duty to do so

## **7. Information we process because we have a legal obligation**

Sometimes, we must process your information in order to comply with a statutory obligation.

For example, we may be required to give information to legal authorities if they so request or if they have the proper authorisation such as a search warrant or court order.

This may include your personal information.

## **Specific uses of information you provide to us**

### **8. Complaints regarding content on our website**

If you complain about any of the content on our website, we shall investigate your complaint. If we feel it is justified or if we believe the law requires us to do so, we shall remove the content while we investigate.

Free speech is a fundamental right, so we have to make a judgment as to whose right will be obstructed: yours, or that of the person who posted the content that offends you. If we think your complaint is vexatious or without any basis, we shall not correspond with you about it.

### **9. Information relating to your method of payment**

Payment information that accompanies a transaction that you undertake with us is never kept or transferred to another source.

### **10. Communicating with us**

When you contact us, whether by telephone, through our website or by e-mail, we collect the data you have given to us in order to reply with the information you need. We record your request and our reply in order to increase the efficiency of our organisation. Hence for a limited time we keep personally identifiable information associated with your message, such as your name and email address so as to be able to track our communications with you to provide a high quality service.

### **11. Complaining**

When we receive a complaint, we record all the information you have given to us. We use that information to resolve your complaint. If your complaint reasonably requires us to contact some other person, we may decide to give to that other person some of the information contained in your complaint. We do this as infrequently as possible, but it is a matter for our sole discretion as to whether we do give information, and if we do, what that information is. We may also compile statistics showing information obtained from this source to assess the level of service we provide, but not in a way that could identify you or any other person.

## **Use of information we collect through automated systems when you visit our website**

### **12. Cookies**

Cookies are small text files that are placed on your computer's hard drive by your web browser when you visit any website. They allow information gathered on one web page to be stored until it is needed for use on another, allowing a website to provide you with a personalised experience and the website owner with statistics about how you use the website so that it can be improved. Some cookies may last for a defined period of time, such as one day or until you close your browser. Others last indefinitely. Your web browser should allow you to delete any you choose. It also should allow you to prevent or limit their use.

Our website uses cookies. They are placed by software that operates on our ISP's servers, and by software operated by third parties whose services we use. When you first visit our website, we ask you whether you wish us to use cookies. If you choose not to use cookies or you prevent their use through your browser settings, you may not be able to use all the functionality of our website.

We use cookies in the following ways:

- to track how you use our website
- to record whether you have seen specific messages we display on our website
- to keep you signed in our site, should any such facility become in use.
- to record your answers to surveys and questionnaires on our site while you complete them, should any such facility become in use.

### **13. Personal identifiers from your browsing activity**

Requests by your web browser to our servers for web pages and other content on our website are recorded. We record information such as your geographical location, your Internet service provider and your IP address. We also record information about the software you are using to browse our website, such as the type of computer or device and the screen resolution. We use this information in aggregate to assess the popularity of the webpages on our website and how we perform in providing content to you. If combined with other information we know about you from previous visits, the data possibly could be used to identify you personally, even if you are not signed in to our website.

## **Disclosure and sharing of your information**

### **14. Third party advertising on our website**

Third parties may advertise on our website. In doing so, those parties, their agents or other companies working for them may use technology that automatically collects information about you when their advertisement is displayed on our website. They may also use other technology such as cookies or JavaScript to personalise the content of, and to measure the performance of their adverts. We do not have control over these technologies or the data that these parties obtain. Accordingly, this privacy notice does not cover the information practices of these third parties.

### **15. Data may be processed outside the European Union**

Our websites are hosted by Host Papa in Canada. We may also use outsourced services in countries outside the European Union from time to time in other aspects of our business. Accordingly data obtained within the UK or any other country could be processed outside the European Union. For example, some of the software our website uses may have been developed in the United States of America or in Australia. We use the following safeguards with respect to data transferred outside the European Union:

## **Control over your own information**

### **16. Your duty to inform us of changes**

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes.

### **17. Access to your personal information**

At any time you may review or update personally identifiable information that we hold about you, by contacting our secretary via our website. To obtain a copy of any information that is not provided on our website you should contact us to make that request. After receiving the request, we will tell you when we expect to provide you with the information, and whether we require any fee for providing it to you.

### **18. Removal of your information**

If you wish us to remove personally identifiable information from our website, you should contact us to make your request. This may limit the service we can provide to you.

### **19. Verification of your information**

When we receive any request to access, edit or delete personal identifiable information we shall first take reasonable steps to verify your identity before granting you access or otherwise taking any action. This is important to safeguard your information.

## **Other matters**

### **20. Use of site by children**

We do not sell products or provide services for purchase by children, nor do we market to children. If you are under 18, you may use our website, we do not publish anything that could be considered as detrimental to the well-being of children.

### **21. Encryption of data sent between us**

We use Secure Sockets Layer (SSL) certificates to verify our identity to your browser and to encrypt any data you give us. Whenever information is transferred between us, you can check that it is done so using SSL by looking for a closed padlock symbol or other trust mark in your browser's URL bar or toolbar.

### **22. How you can complain**

If you are not happy with our privacy policy or if you have any complaint then you should tell us. You can submit a complaint to the organisation via the link to the secretary on our "Committee" page. If a dispute is not settled then we hope you will agree to attempt to resolve it by engaging in good faith with us in a process of mediation or arbitration. If you are in any way dissatisfied about how we process your personal

information, you have a right to lodge a complaint with the Information Commissioner's Office (ICO). This can be done at <https://ico.org.uk/make-a-complaint/>. We would, however, appreciate the opportunity to talk to you about your concern before you approach the ICO.

### **23. Retention period for personal data**

Except as otherwise mentioned in this privacy notice, we keep your personal information only for as long as required by us:

- to provide you with the services you have requested;
- to comply with other law, including for the period demanded by our tax authorities;
- to support a claim or defence in court.

### **24. Compliance with the law**

Our privacy policy has been compiled so as to comply with the law of every country or legal jurisdiction in which we aim to do business. If you think it fails to satisfy the law of your jurisdiction, we should like to hear from you. However, ultimately it is your choice as to whether you wish to use our website.

### **25. Review of this privacy policy**

We may update this privacy notice from time to time as necessary. The terms that apply to you are those posted here on our website on the day you use our website. We advise you to print a copy for your records. If you have any question regarding our privacy policy, please contact us using the information supplied on our "Committee" page.