

The Ironmongers' Company and Ferroners PLC (GDPR)

POLICY ON PROCESSING PERSONAL DATA AND MEMBERS' AND GUESTS' PRIVACY

1. **Introduction.** The Ironmongers' Company and Ferroners PLC are committed to safeguarding the privacy of their members, guests and clients. The Ironmongers' Company and Ferroners PLC will only use the information it collects about you lawfully and in accordance with the Data Protection Act 1998 ("the Act").
2. **Changes to Data Protection Legislation.** Data Protection legislation and the Act are currently going through a period of change. The European Union's General Data Protection Regulation (GDPR) and the new British Data Protection Bill that will replace the Act and is currently passing through Parliament, are the basis for this change. This Privacy Notice is therefore intended to comply with the Act and GDPR but may change over time.
3. **Members' Terms and Conditions.** This Privacy Notice forms part of the terms and conditions for membership of the Ironmongers' Company. In legal terms members, guests and clients of the Ironmongers' Company and Ferroners PLC are "data subjects" ie "you". However, under this we may also collect personal information regarding your spouse and dependents if appropriate.
4. **The Data Controller.** The Worshipful Company of Ironmongers (known as the Ironmongers' Company) and Ferroners PLC are from a legal perspective classed as Data Controllers.
5. **Data Protection Officer (DPO).** The Ironmongers' Company and Ferroners PLC do not have a DPO but the Clerk has the responsibility for your data protection compliance. Verbal enquiries will be treated appropriately by Company staff members, although a written follow up may be requested if appropriate.
6. **Purpose of Processing Personal Data.** The Ironmongers' Company collects personal data primarily to support and advance the administration of its charities for the achievement of its charitable objects. It also supports the Lord Mayor and the City Corporation and raises funds for charitable work. We will retain your personal data held under consent while you are a member of the Ironmongers' Company. Upon leaving or death, the Ironmongers' Company will continue to hold your name and relevant details to support the Ironmongers' Company's historical records.

Ferroners PLC collects personal data primarily to support and advance the administration of its commercial activities in support of the Ironmongers' Company. These include the commercial hiring of Ironmongers' Hall to clients for their events.

We will retain your personal data held under consent for the better administration, including reference, of repeat business.

7. Lawful Basis of Processing Personal Data. The lawful basis of processing your personal data is your consent. Once you have agreed to this Privacy Notice as part of the Ironmongers' Company's and Ferroners PLC's Terms and Conditions, you will be registered for the processing of your personal data, based upon your consent.
8. Categories of Personal Data Processed. The personal information which the Ironmongers' Company and Ferroners PLC hold should be accurate and up-to-date. This information will be held securely in accordance with the companies' internal data protection and security policies. The categories of personal data which the Ironmongers' Company and Ferroners PLC will collect about you include your:
 - Names
 - Postal address
 - E-mail address
 - Mobile and/or landline telephone numbers
 - Dietary information
 - Other information

If, as a member, you apply or come to fill further appointments within the Ironmongers' Company, further information may be requested and additional records such as interview notes retained. Equally, records of decisions and records of meetings may include your name and other information about you.

9. Category of Recipients of Personal Data. Your name and contact details will primarily only be used within the Ironmongers' Company and Ferroners PLC. However, if you attend a dinner or participate in a charitable outreach activity, the staff of the Ironmongers' Company or their agents will normally have to provide your name and possibly other details to other entities or organisations.
10. Transfer of Personal Data outside the EEA (European Economic Area). Personal data will only be transferred outside the EEA or other areas of adequacy determined by the EU, for specific events. If this is required, consent will be specifically requested of you.
11. Sensitive Personal Data. The Ironmongers' Company and Ferroners PLC will never collect sensitive personal data about you without your explicit consent and a clear explanation of why it is required.
12. Personal Data of Member's Family. For personal data on a member's child(ren) under the age of 18, the Ironmongers' Company staff will assume parental consent. However, your child(ren) may withdraw consent, including as an adult.

13. Sale or Passing of Personal Data to Third Parties. The Ironmongers' Company and Ferroners PLC will not sell or pass your personal data to any commercial organisation.

14. Retention of Personal Data. We will retain your personal data held under consent while you are a member of the Ironmongers' Company. Upon leaving or death the Ironmongers' Company will continue to hold your name and relevant details to support the Ironmongers' Company's historical records.

15. Data Subject's Rights. Under the Act and GDPR you have a number of rights as shown below:

- Right of Access. You are entitled to access your personal data so that you are aware of and can verify the lawfulness of the processing. This is achieved through the mechanism, of a Subject Access Request (SAR) and you have the right to obtain:
 - Confirmation that your data is being processed (held)
 - Access to your personal data (copy) and
 - Other supplementary information that corresponds to the information in this Privacy Notice

- Fees and Timings. Under GDPR and from 25 May 2018 this information will be provided without charge, without delay and within one month. If an extension is required or requests are considered manifestly unfounded or excessive, in particular because they are repetitive, the Ironmongers' Company may:
 - choose to charge a reasonable fee taking into account the administrative costs of providing the information or
 - refuse to respond. The reasons will be formally notified to you and your rights of appeal to the appropriate Supervisory Authority ie UK Information Commissioner's Office (ICO) will be highlighted.

- Identity Verification. To protect your personal data, the staff of the Ironmongers' Company and Ferroners PLC will seek to verify your identity before releasing any information, which will normally be in electronic format. This will normally be a simple process. However, if the SAR comes from a member living overseas, or a former member, or a relative of a deceased member, then additional verification steps are likely.

- Right of Rectification. You are entitled to have personal data rectified or corrected if it is inaccurate or incomplete. The Ironmongers' Company and Ferroners PLC staff will respond within one month of your request. In the unlikely event that the rectification does not take place, the Ironmongers' Company or Ferroners PLC will inform you of your rights to complain or seek judicial remedy.

- Right of Erasure. You may request the deletion or removal of personal data where there is no compelling reason for its continued processing. The Right to Erasure does not provide an absolute '*right to be forgotten*'. However, you do have a right to have personal data erased and to prevent processing in specific circumstances:
 - Where the personal data is no longer necessary in relation to the purpose for which it was originally collected/processed
 - When you withdraw consent
 - When you object to the processing and there is no overriding legitimate reason for continuing the processing
 - The personal data was unlawfully processed
 - The personal data has to be erased in order to comply with a legal obligation
 - The personal data is processed in relation to the offer of information for social services to a child which the Ironmongers' Company and Ferroners PLC do not provide

- Right to Restrict Processing. Under the Act, you have a right to '*block*' or suppress processing of personal data. The restriction of processing under GDPR is similar. When processing is restricted, the Ironmongers' Company and Ferroners PLC are permitted to store the personal data, but not process it further. In this event, exactly what is held and why will be explained to you.

- Right to Data Portability. You may ask to obtain and reuse your personal data for your own purposes across different services. This allows you to move, copy or transfer personal data easily from one IT environment to another in a safe and secure way, without hindrance to usability. The Right to Data Portability only applies:
 - To personal data you have supplied to the Ironmongers' Company and/or Ferroners PLC
 - Where the processing is based upon your consent or for the performance of a contract and
 - When processing is carried out by automated means

In these circumstances, the Ironmongers' Company and/or Ferroners PLC will provide you with a copy of your data in CSV or PDF format free of charge, without delay and within one month. If there is going to be a delay you will be informed.

- Right to Object. You have the right to object to:

- Processing based on legitimate interests or the performance of a task in the public interest/exercise of official authority (including profiling)
- Direct marketing (including profiling) and
- Processing for purposes of scientific/historical research and statistics
- The Ironmongers' Company and Ferroners PLC do not participate in the first and third activities above but does conduct marketing activities

16. Automated Decision-making and Profiling. The Ironmongers' Company and Ferroners PLC does not employ any automated decision-making or conduct profiling of Data Subjects. However if you have consented to your details being held on the Ironmongers' Company's or Ferroners PLC's data base, you may periodically be sent marketing information so that you are informed of forthcoming events and job opportunities. These will be automated but do not involve automated decision-making or profiling.