

Huddersfield Canal Society Privacy Policy

1. Introduction

In May 2018 the General Data Protection Regulation (GDPR) comes into force. It requires all organisations that hold personal data to be transparent about the data they have, why they have it and how it is used.

Huddersfield Canal Society Ltd (referred to as HCS or the Society) is committed to protecting your privacy and security. The society is therefore publishing this policy to explain how and why we use your personal data, and to ensure you remain informed and in control of your information.

2. Who are we?

“We” and “Us” is Huddersfield Canal Society Ltd (otherwise referred to as HCS). Your personal data (i.e. any information which identifies you, or which can be identified as relating to you personally) will be collected and used by Huddersfield Canal Society Ltd (HCS) (charity no. 510201), a non-profit distributing company limited by guarantee with registration number 01498800.

For the purposes of data protection law, the Trustees of HCS will be the controller and our Administrator will be the processor.

3. What personal data do we hold?

The information HCS holds on its members is the information that members have provided when they completed their membership forms or subsequent updates when changes in their circumstances have been advised to HCS.

This data consists of name, address, telephone number and in some cases email address. We also keep a record of whether members have asked for Gift Aid to be claimed on payments. We also hold information on any special areas of interest notified to us such as willingness to volunteer with crewing or maintenance work including a record of hours spent volunteering.

We do not hold any sensitive personal information. However if you have an accident when volunteering your name and the circumstances would be entered in the Accident Book.

If you are a volunteer then we may collect extra information about you (e.g. references, criminal records checks, details of emergency contacts, medical conditions etc.). This information will be retained for legal reasons, to protect us (including in the event of an insurance or legal claim) and for safeguarding purposes.

If a member completes a Standing Order for the payment of their subscription the form includes bank account details. These forms are sent to the member's bank and the bank details are not stored by us.

If you purchase HCS membership as a gift for someone or join as joint members your details will be recorded (as will the recipient's) and your relationship to that person will be recorded.

We also hold publicly available contact details of elected representatives and others such as press contacts who may have an interest in the work of the Society.

If you purchase items of merchandise from us we may hold payment information such as credit/debit card or direct debit details for the purposes of sales only. Further information on financial security appears in section 17.

4. What do we do with your data?

We use the details we hold about you to contact you about your membership and to send you information about the canal and the Society, including the newsletter, Pennine Link, any promotional literature which we consider supports the Society's aims and objectives and any fund-raising initiatives we have.

The information is used in the creation of address labels and renewal reminders. We use some of the information to keep records of your subscriptions.

We will seek to ensure that our use of your data does not conflict with your rights and freedoms or legitimate interests.

We conduct analysis on the information we hold, which can in turn generate personal data. For example, by analysing your subscription data, we can provide timely reminders, final letters and the necessary mailing list for Pennine Link each quarter.

If you are a member of our 220 Club we generate a unique membership number or numbers which enables random selection of the quarterly winners.

We will never sell your personal data, and will only ever share it with organisations we work with where necessary to provide services such as sale of goods or to manage Gift Aid contributions and only then if its privacy and security are guaranteed.

5. On what lawful basis do we hold this data?

The Society has Legitimate Interests in holding and using this information for the following reasons:

- When members filled in their details on the application form they had a reasonable expectation that those details would be used to keep them informed and to contact them about their membership (or to apply for Gift Aid, if appropriate).
- It is necessary for administration and fulfilment of people's membership. It would not be possible for the Society to keep members informed or to administrate their membership (or to claim Gift Aid) without holding and using that data.
- Contact information we hold for elected representatives, relevant local authority officers, newspaper editors and others who may have an interest in the work of HCS has been published by the government, local council, newspaper or organisation concerned.

A separate Legitimate Interests Assessment demonstrating the application of this approach is shown at Appendix 1 to this policy.

There may be specific circumstances where there is a need to share members data between a group of other members to facilitate coordination of operations or events. If and when this approach is required specific consent will be sought from each member involved.

6. How up to date is the information?

The information we hold was originally supplied by members on their application forms. When members notify us of any changes, the information is updated.

7. Can I see or change my information?

You have a right to see the information we hold on you, for example if you wish to check it for its accuracy. If you wish to do so, please contact our Administrator, by email (hcs@huddersfieldcanal.com), by post (Membership, Huddersfield Canal Society, Transhipment Warehouse, Wool Road, Dobcross, Oldham, OL3 5QR) or by telephone 01457 871800 (Office hours 8.30am to 4pm, Monday to Thursday, Friday 8.30am to 1pm).

If you are not happy with our response, or you believe that your data protection or privacy rights have been infringed, you can complain to the UK Information Commissioner's Office which regulates and enforces data protection law in the UK. Details of how to do this can be found at www.ico.org.uk

8. How and where is the information stored?

We employ a variety of physical and technical measures to keep your data safe and to prevent unauthorised access to, or use or disclosure of your personal information.

Members' information is securely stored on computer with encrypted back-up copies.

Original paper applications and Gift Aid forms are kept in a file in case they are required as evidence.

HCS's operations are based in the UK and we store our data within the European Union. Some organisations which provide services to us may transfer personal data outside of the EEA, but we'll only allow them to do so if we believe your data is adequately protected.

For example, some of our systems use Microsoft products. As a US company, it may be that using their products result in personal data being transferred to or accessible from the US. However, we accept this as we are certain personal data will still be adequately protected (as Microsoft is certified under the USA's Privacy Shield scheme).

9. How long is the information kept?

Information is kept as long as it is required for the purposes it was collected. When someone is no longer a member their data is kept for 12 months and then deleted. We may also be required to store data to satisfy legal requirements, for financial audit purposes or to satisfy insurance requirements. For instance, we are legally required to keep information relating to Gift Aid for 6 calendar years after the date of the last payment.

10. Information about non-members

In addition to information about members we hold contact information for elected representatives (MP, councillors), in whose constituencies the Huddersfield Canals lie, officers of the riparian local authorities, Canal & River Trust staff with responsibilities for management, maintenance, operations and promotion of the canals, local regional and national media contacts and others who may have an interest in the work of the Society. This information comprises name and publicly available correspondence address (for example as published on the local council or newspaper website), telephone numbers and email addresses. The address data is necessary for the creation of address labels in order to send copies of Pennine Link for the information of recipients. If someone ceases to be an elected representative or holder of a relevant post their information is deleted. Email and telephone numbers are held to speed up contact where this is needed.

11. Can I have my information removed?

You have a right to ask us to remove the data we have for you. However, you should be aware that if you do this we will no longer be able to communicate with you.

You can decide not to receive communications or change how we contact you at any time. If you wish to do so, please contact our Administrator, by email (hcs@huddersfieldcanal.com), by post (Membership, Huddersfield Canal Society, Transshipment Warehouse, Wool Road, Dobcross, Oldham, OL3 5QR) or by telephone 01457 871800 (Office hours 8.30am to 4pm, Monday to Thursday, Friday 8.30am to 1pm).

12. Email address and phone number

If you have given us your email address or phone number we may use this to contact you about your membership or to pass on important information that can't wait until the next Pennine Link. We will not use your email address or telephone number for other purposes without obtaining your specific consent. An example of the consent which may be sought is the sharing of such contact details between boat crew members. This is currently needed to ensure that any last minute changes to the roster can be agreed between crew members.

Some members have asked us to send their Pennine Link in electronic form via email so we have their specific consent for doing this.

13. Our website

Our website may use cookies to collect information about visitors for the purpose of analysis and statistics. This information cannot identify who individual visitors are. No personal information is collected. If you send the Society an email your email address will be used for sending you a reply but will not be used for any other purpose. We do not pass on email addresses to anyone else.

If you click links to other web sites linked from our website, those sites may use their own cookies. These do not identify you personally or harm your computer but they may occasionally result in you seeing advertisements on other websites that are intended to reflect your interests.

Cookies of this sort are not harmful to your computer and can improve your online experience by recognising you when you return to a web site or remembering your previous purchases, etc. If you are fine about this, we would suggest that you take no action and allow cookies to be used. Your consent to these cookies being used will be implied.

If you are unhappy about the use of cookies you can, if you wish, set your web browser not to accept them or to delete them.

External websites may use their own cookies, for example: PayPal, if you order something online, for the purpose of processing your transaction. By use of the website you are consenting for this use of cookies.

If an external website requests personal information from you (e.g. in connection with an order for goods or services), the information you provide will not be covered by HCS's Privacy Policy. We suggest you read the privacy policy of any website before providing any personal information.

When purchasing goods or services from any of the businesses that our site links to, you will be entering into a contract with them (agreeing to their terms and conditions) and not with HCS.

14. Gift Aid

If you have asked for Gift Aid to be claimed on your payments to the Society we need to share your name, address and the amount paid to us with HMRC in order to make a Gift Aid claim. When members ask for their payments to be treated as Gift Aid they have a reasonable expectation that the Society will share information with HMRC and sharing this information is a necessary part of making the claim. You have a right to ask us not to share your data with HMRC. However, you should be aware that if you do this we will no longer be able to claim Gift Aid on your payments.

15. Payment security

All electronic HCS forms that request financial data will use the Secure Sockets Layer (SSL) protocol to encrypt the data between your browser and our servers.

We do not have a credit card facility.

Of course, we cannot guarantee the security of your home computer or the internet, and any online communications (e.g. information provided by email or our website) are at the user's own risk.

16. Changes to this Privacy Policy

We'll amend this Privacy Policy from time to time to ensure it remains up-to-date and accurately reflects how and why we use your personal data. The current version of our Privacy Policy will always be posted on our website.

Published version

15th May 2018

Appendix 1 – Legitimate Interests Assessment

As stated in Section 5 of the Huddersfield Canal Society's Privacy Policy, the Society has determined that the Lawful Basis for holding and using the data is that it has Legitimate Interests in doing so. This assessment demonstrates how this approach has been applied.

1. Identification:

The Legitimate Interests identified were:

- When members filled in their details on the application form they had a reasonable expectation that those details would be used to keep them informed and to contact them about their membership (or to apply for Gift Aid, if appropriate).
- It is necessary for the administration and fulfilment of people's membership.
- It would not be possible for the Society to keep members informed or to administrate their membership (or to claim Gift Aid) without holding and using this data.
- Contact information we hold for elected representatives, relevant local authority employees, newspaper editors and others who may have an interest in the work of the Society is in the public realm, having been published by the government, local council, newspaper or organisation concerned.

2. Necessity:

The data is used in the creation of address labels, renewal reminders and other communications. It would not be possible to contact members and other interested parties or keep them informed about the Society without the use of this data. There is no easily achievable alternative way to fulfil these objectives.

3. Balance:

We have evaluated the balance between the Society's interests and those of the individuals whose data is processed and concluded that the rights and freedoms of the individuals do not override the Society's Legitimate Interests.

This conclusion was reached for these reasons:

- The individuals concerned had reasonable expectations that the data would be used in the way the Society uses it.
- Using the data is in the interests of the individuals.
- Using the data is not intrusive and does not have an adverse impact on the individuals.
- No sensitive data or data relating to children is involved.
- The data is not disclosed to other people (other than to HMRC in relation to Gift Aid).
- The following safeguards are in place: individuals may see or change the data relating to them; individuals may have their data removed if they so wish; data is deleted when no longer required; data is not accessible other than to the Processor; a statement which amongst other things explains members' rights has been sent to members in the Spring 2018 edition of the Society's magazine, Pennine Link and the full Privacy Policy is being published on the Society's website.