# The Alcuin Club Privacy Policy



A Registered Charity No. 274203

### Introduction

This privacy notice provides you with details of how we collect and process your personal data including through use of our web site alcuinclub.org.uk and any subdomains, including any information you may provide through our site when you purchase a publication or sign up to membership of the Club

The Alcuin Club is the data controller and we are responsible for your personal data (referred to as "we", "us" or "our" in this privacy notice).

#### **Contact Details**

Our full details are:

Full name of legal entity: Alcuin Club Email address: alcuinclub@gmail.com

Postal address: 5 Saffron Street Royston Herts UK SG8 9TR

Telephone number: +44 (0) 1763 248676

If you are not happy with any aspect of how we collect and use your data, you have the right to complain to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues (www.ico.org.uk). We should be grateful if you would contact us first if you do have a complaint so that we can try to resolve it for you.

It is very important that the information we hold about you is accurate and up to date. Please let us know if at any time your personal information changes by emailing us at alcuinclub.org.uk

# What data do we collect about you?

**Personal data** means any information capable of identifying an individual. It does not include anonymised data. We may process certain types of personal data about you as follows:

**Identity Data** may include your first name, maiden name, last name, username, title, and gender.

**Contact Data** may include your billing address, delivery address, email address and telephone numbers.

**Financial Data** may include your bank account and payment card details.

Transaction Data may include details about payments you make and other details of purchases made by you.

**Technical Data** may include your login data, internet protocol addresses, browser type and version, browser plug-in types and versions, time zone setting and location, operating system and platform and other technology on the devices you use to access this site. **Profile Data** may include your purchases or orders, your interests, preferences, feedback and survey responses.

**Usage Data** may include information about how you use our website, products and services. We may also process **Aggregated Data** from your personal data but this data does not reveal your identity and as such in itself is not personal data. An example of this is where we review your Usage Data to work out the percentage of website users using a specific feature of our site. If we link the Aggregated Data with your personal data so that you can be identified from it, then it is treated as personal data.

### Sensitive Data

**Sensitive data** refers to data that includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data. The only sensitive data we collect is that of your religious affiliation.

Where we are required to collect personal data by law, or under the terms of the contract between us and you do not provide us with that data when requested, we may not be able to perform the contract (for example, to deliver goods or services to you). If you don't provide us with the requested data, we may have to cancel a product or service you have ordered but if we do, we will notify you at the time.

# How we collect your personal data

We collect data about you through a variety of different methods including:

Direct interactions: You may provide data by filling in forms on our site (or otherwise) or by communicating with us by post, phone, email or otherwise, including when you: order our products or services; create an account on our site; subscribe to our membership or publications; request information about the club be sent to you.

**Automated technologies or interactions**: As you use our site, we may automatically collect Technical Data about your equipment, browsing actions and usage patterns. We collect this data by using cookies, server logs and similar technologies. We may also receive Technical Data about you if you visit other websites that use our cookies. We have provided further details on cookies below.

**Third parties or publicly available sources**: We may receive personal data about you from various third parties and public sources as set out below:

Google based inside and outside the EU: http://www.google.com/intl/en/policies/privacy/ Identity and Contact Data from Crockfords, to which we subscribe:

https://www.crockford.org.uk/

Identity and Contact Data from publicly available sources such as The Internet, Post Office address finder or the Electoral Register based inside the EU.

# How we use your personal data

We will only use your personal data when legally permitted. The most common uses of your personal data are:

Where we need to perform the contract between us or administer your membership of the Club.

Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.

Where we need to comply with a legal or regulatory obligation.

# Purposes for processing your personal data

Set out below is a description of the ways we intend to use your personal data and the legal grounds on which we will process such data. We have also explained what our legitimate interests are where relevant. We may process your personal data for more than one lawful ground, depending on the specific purpose for which we are using your data.

Purpose/Activity	Type of data	Lawful basis for processing
To register you as a new customer or member	(a) Identity (b) Contact	Performance of a contract with you
To process and deliver your order or membership including:  (a) Delivery of Publications  (b) Manage payments fees and charges  (c) Collect and recover money owed to us	<ul><li>(a) Identity</li><li>(b) Contact</li><li>(c)</li><li>Financial</li><li>(d)</li><li>Transaction</li></ul>	(a) Performance of a contract with you (b) Necessary for our legitimate interests to recover debts owed to us
To manage our relationship with you which will include:	(a) Identity	(a) Performance of a contract with you

(a) Notifying you about changes to our terms or privacy policy	(b) Contact (c) Profile	<ul><li>(b) Necessary to comply with a legal obligation</li><li>(c) Necessary for our legitimate interests to keep our records updated</li></ul>
To administer and protect our business and our site (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	(a) Identity (b) Contact (c) Technical	(a) Necessary for our legitimate interests for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise (b) Necessary to comply with a legal obligation
To use data analytics to improve our website, products/services, marketing, customer relationships and experiences	(a) Technical (b) Usage	Necessary for our legitimate interests to define types of customers for our products and services, to keep our site updated and relevant

# Change of purpose

We will only use your personal data for the purposes for which we collected it. If we need to use your personal data for a purpose unrelated to the purpose for which we collected the data, we will notify you and we will explain the legal ground of processing. We may process your personal data without your knowledge or consent where this is required or permitted by law.

# Disclosures of your personal data

We may have to share your personal data with the parties set out below for the purposes set out in the table above:

Service providers who provide IT, system administration services and mailing services. Professional advisers including bankers and auditors who provide banking and accounting services.

HM Revenue & Customs, regulators and other authorities based in the United Kingdom and other relevant jurisdictions who require reporting of processing activities in certain circumstances.

We require all third parties to whom we transfer your data to respect the security of your personal data and to treat it in accordance with the law. We only allow such third parties to process your personal data for specified purposes and in accordance with our instructions.

### International Transfers

Countries outside of the European Economic Area (EEA) do not always offer the same levels of protection to your personal data, so European law has prohibited transfers of personal data outside of the EEA unless the transfer meets certain criteria. Some of our third parties service providers are based outside the European Economic Area (EEA) so their processing of your personal data will involve a transfer of data outside the EEA.

Whenever we transfer your personal data out of the EEA, we do our best to ensure a similar degree of security of data by ensuring at least one of the following safeguards is implemented:

We will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data by the European Commission; or Where we use certain service providers, we may use specific contracts or codes of conduct or certification mechanisms approved by the European Commission which give personal data the same protection it has in Europe; or

Where we use providers based in the United States, we may transfer data to them if they are part of the EU-US Privacy Shield which requires them to provide similar protection to personal data shared between the Europe and the US.

If none of the above safeguards is available, we may request your explicit consent to the specific transfer. You will have the right to withdraw this consent at any time.

# **Data Security**

Your data is stored in a database held on a computer belonging to the Membership Secretary and in an accounting package held on a computer belonging to the Treasurer. Customer data of purchasers of publications purchased via our web site are held on the servers used by our web site suppliers. We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to Committee members and other third parties who have a business need to know such data. They will only process your personal data on our instructions and they are subject to a duty of confidentiality. We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

### **Data Retention**

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements. To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements. By law we must keep basic information about our customers (including Contact, Identity, Financial and Transaction Data) for six years after they cease being customers for tax purposes.

In some circumstances you can ask us to delete your data: see below for further information.

# **Your Legal Rights**

Under certain circumstances, you have rights under data protection laws in relation to your personal data. These include the right to:

Request access to your personal data.

Request correction of your personal data.

Request erasure of your personal data.

Object to processing of your personal data.

Request restriction of processing your personal data.

Request transfer of your personal data.

Right to withdraw consent.

You can see more about these rights at:

https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/

If you wish to exercise any of the rights set out above, please email us at alcuinclub@gmail.com

You will not have to pay a fee to access your personal data (or to exercise any of the other rights).

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

# Third-party Links

Our website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy notice of every website you visit.

### Cookies

A web cookie is a small piece of data that is sent from our website and stored on your browser or the hard drive of your computer. You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly.

Each time you use our website, your browser will send the cookie back to us so that we know your previous activity on our website. This helps us to improve your user experience.

We use the following cookies:

**Strictly necessary cookies**. These are cookies that are required for the operation of our website. They include, for example, cookies that enable you to log into secure areas of our website, use a shopping cart or make use of e-billing services.

**Analytical/performance cookies**. They allow us to recognise and count the number of visitors and to see how visitors move around our website when they are using it. This helps us to improve the way our website works, for example, by ensuring that users are finding what they are looking for easily.

**Functionality cookies**. These are used to recognise you when you return to our website. This enables us to personalise our content for you, greet you by name and remember your preferences (for example, your choice of language or region).

**Targeting cookies**. These cookies record your visit to our website, the pages you have visited and the links you have followed. We will use this information to make our website more relevant to your interests. We may also share this information with third parties for this purpose.

Please note that our third-party web traffic analytic sites may also use cookies, over which we have no control.

You can block our cookies by activating the setting on your browser that allows you to block cookies. If you do block our cookies however, you may not be able to access all or parts of our website.

To find out more about cookies, including how to see what cookies have been set and how to manage and delete them, visit www.allaboutcookies.org.

By using our website, you consent to our use of cookies.