### **Buckingham Wine Circle Privacy Notice**

#### Who we are

Buckingham Wine Circle is a wine appreciation and social club set up for the enjoyment of fine wines and the fellowship of our members Buckingham Wine Circle is the Data Controller for the purposes of Data Protection Law (UK GDPR and Data Protection Act 2018)

For general enquiries please contact the Club Chairman John Horton email: BuckinghamWineCircle@gmail.com Tel:07821 820987

#### **Personal Data**

Personal data is any information that can be used to identify you as an individual. It can include name, address, phone number, email address and IP address. The processing of personal data by organisations is governed by the Data Protection Act 2018 and the UK General Data Protection Regulation (GDPR). We take your privacy seriously and we will only use the information we collect about you lawfully. This Privacy Notice sets out how we use your personal data

# What information we collect and how we collect it

We will collect personal data from you directly when you join the Circle and for selected events and trips that we organise through the year. **Example**: When you join the circle, you will be asked for your name,

address, phone number and email address on a membership application form

**Example:** When attending a dining event we may ask for food preferences and details of any allergies.

As a general rule, we don't keep sensitive data about you (e.g. health/medical information, date of birth, bank account details, political or religious beliefs, etc). There may be rare occasions where an event is cancelled where you have requested refund via a bank transfer. These details are only used to complete such transactions and deleted immediately afterwards.

## What do we use your data for?

We use your information to send you updates about the Circles programme of events and to manage membership of the Circle

**Example:** We send regular Newsletters to inform you about recent meetings, share wine stories and to inform you of the upcoming programme of events.

**Example:** As a member, your name will be added to a list of members circulated at Circle committee meetings to enable us to better understand our membership

## How do we process your data?

We store your information both in paper form and electronically by committee members. In electronic form, they are typically held in spreadsheets and password protected wherever possible.

## Lawful bases for processing

Data protection law sets out a number of reasons, or lawful bases, for which organisations may collect and process personal data. The law allows for six different lawful bases in total but only two are relevant to the type of activities undertaken by Buckingham Wine Circle

1. Personal data is processed on the basis of it being in the Legitimate Interests of Buckingham Wine Circle

**Example:** It is a legitimate interest of Buckingham Wine Circle to organise wine tasting events and trips for which membership lists are utilised for management and coordination of such events.

2. Personal data is processed in line with a Contractual relationship **Example:** You become a member of Buckingham Wine Circle. As you are entering into a contractual relationship with us and abide by the BWC Constitution we will process your personal data and communicate with you for the purpose of Circle administration

Your rights in relation to the personal information we hold about you

Data protection law gives you certain rights over the personal data held by organisations.

- 1. Right to be informed. You have the right to be told how your personal information will be used. This Privacy Notice and any shorter summary statements that may be used in our communications provide you with information regarding the type of personal data we collect, how we collect it and how we use it.
- **2. Right of access.** You may contact us to ask what personal information we are holding about you and to request a copy of that information. You must provide proof of your identity by sending us two pieces of approved identification. We have 30 days to comply with your request once we are satisfied that you have the right to see the requested records and have successfully confirmed your identity.
- **3. Right of rectification**. You may ask us to correct any personal data where it is incomplete, incorrect or where it is out of date.
- **4. Right of erasure**. You may request that we delete the information we hold about you. If there is no overriding legal reason why we cannot do that (if for example, you are in a legal dispute with the Circle) we will delete your record. We may suggest keeping basic details for a suppression list, to prevent us from contacting you again, rather than complete deletion.
- **5. Right to restrict processing**. In some situations, you have the right to ask for the processing of your personal data to be restricted, perhaps because you disagree with its accuracy or legitimate usage. We will still hold the data, but will not use it, until the restriction is lifted following the resolution of the disagreement.
- **6. Right to data portability**. This right is mainly applicable to service providers, so that people may move from one service to another and so has limited application to Buckingham Wine Circle
- **7. Right to object**. You may object to the processing of your information where it is held on the basis of our Legitimate Interests i.e. Running an event.
- **8. Right to automated decision making**. Buckingham Wine Circle does not process information in any way that would allow this right, therefore this does not apply to personal data held by us.

Who do we share your personal information with?

We will not share your data with anyone outside the Circle Committee, except for

- specific events where we are required by the event organisation to share details related to that event (Example: menu choices for a dining event)
- with our bankers to arrange a bank transfer to a member, the banker's policy may be to retain that information
- when required by Law, or;
- with an Insurance Company for the purposes of arranging insurance cover or in the event of an insurance claim.

# Retention Period for your personal data

The law requires that we keep your personal data for no longer than necessary. The length of time each category of data is held by us varies according to the purpose for which it was collected.

Your personal information is removed within 1 month of when the information ceases being necessary.

**Example:** For a summer meal you provide menu choice and allergy information. This information will only be retained for a maximum of one month following the event

**Example:** You decide to leave the Circle. your information will only be retained to support any processes required for your leaving and will then be deleted

## The Security of your data

Personal data only accessible by Committee members and who need to access your personal data as an essential part of their role

Security and privacy of any data used on our Circle Website (

BUCKINGHAM WINE CIRCLE - Buckingham Wine Circle (e-voice.org.uk) ) is managed on our behalf by eVoice who have separately published Cookie Policy and Privacy Policy

#### **Complaints**

In the first instance please talk to us so that we can try and resolve the problem. If you wish to complain about the way we collect, store or use your personal data, please contact the club chairman Ken Webster kenwebster641@sky.com

## Changes to this **Privacy Notice**

We review and improve our processes regularly and may update this Privacy Notice from time to time. We encourage you to check this page for any changes in order for you to stay informed about how we are protecting the personal information you have entrusted to us. If there are significant changes in the way we process your personal information, we will contact you as well as placing a prominent notice on our website

**Buckingham Wine Circle Privacy Notice Version 02 January 2022**