



Registered Charity no: 1192247

## Privacy Policy

### Introduction

**Cowes Heritage and Community Group** (herein after referred to as CHCG) respects your privacy and is committed to protecting your personal data. This Privacy Policy will inform you as to how CHCG will look after your personal data and tell you about your privacy rights and how the law protects you.

#### 1. Important information and who we are

##### **Purpose of this Privacy Policy**

This Privacy Policy aims to give you information on how CHCG collects and processes your personal data through your use of our website, including any data you may provide through its website when you join CHCG, sign up to its newsletters, access its services or purchase a product or service from CHCG.

It is important that you read this Privacy Policy so that you are fully aware of how and why CHCG is using your data.

##### **Data Controller**

CHCG is the Data Controller and responsible for your personal data.

##### **Contact details**

Our full details are:

Cowes Heritage and Community Group

The Beckford Centre, 5 Beckford Road, Cowes, Isle of Wight PO31 7SE

*Email address:* [data.protection@chcg.org.uk](mailto:data.protection@chcg.org.uk)

*Telephone number:* 01983 244180

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues ([www.ico.org.uk](http://www.ico.org.uk)). We would, however, appreciate the opportunity to deal with your concerns before you approach the ICO so please contact us in the first instance at [data.protection@chcg.org.uk](mailto:data.protection@chcg.org.uk).

##### **Changes to the Privacy Policy and your duty to inform us of changes**

We may need to update our Privacy Policy from time to time. You can check it at any time on our website at: [www.chcg.org.uk](http://www.chcg.org.uk).

It is important that the personal data CHCG holds about you is accurate and current. Please keep it informed of any personal data changes during your membership of CHCG.

### **Third-party links**

CHCG does not provide links that might allow third party organisations to access member and customer personal data held by it.

## **2. The data CHCG collects about you**

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

CHCG may collect, use, store and transfer different kinds of personal data about you which it has grouped together as follows:

- **Identity Data** includes first name, last name, username or similar identifier, CHCG membership number, marital status, title, date of birth and gender.
- **Contact Data** includes postal address, email address and telephone numbers.
- **Financial Data** includes bank account and payment card details.
- **Transaction Data** includes details about payments from you and other details of products and services you have purchased or received from CHCG.
- **Technical Data** includes Internet Protocol (IP) address, your login data, 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 CHCG's website.
- **Profile Data** includes your username and password, purchases or orders made by you, your interests and preferences, feedback and survey responses.
- **Usage Data** includes information about how you use CHCG's website, products and services.

CHCG may also collect, use and share **Aggregated Data** such as statistical or demographic data. Aggregated Data may be derived from your personal data but is not considered personal data in law as this data does not directly or indirectly reveal your identity. For example, CHCG combines or connects Aggregated Data with your personal data so that it can directly or indirectly identify you, CHCG treats the combined data as personal data which will be used in accordance with this Privacy Policy.

### **If you fail to provide personal data**

If you cannot provide the information requested at the time you apply to become a member of or renew your membership of CHCG then CHCG reserves the right to refuse or renew membership. Membership fees will not be refunded.

## **3. How is your personal data collected?**

CHCG uses different methods to collect data from and about you including through:

- **Direct interactions.** You may give CHCG your Identity, Contact and Financial Data by filling in forms or by corresponding with it by post, phone, email or otherwise. This may include personal data you provide when you:
  - apply for CHCG products or services;
  - apply for membership of CHCG;
  - create an account on CHCG's website;

- purchase goods and services from CHCG;
- subscribe to CHCG’s service or publications;
- request marketing to be sent to you;
- provide CHCG with historical information or submissions for CHCG’s records;
- enter a competition, promotion or survey; or
- provide feedback to CHCG.
- **Automated technologies or interactions.** As you interact with CHCG’s website, CHCG may automatically collect Technical Data about your equipment, browsing actions and patterns. CHCG collects this personal data by using cookies and other similar technologies.
- **Cookies.** CHCG’s website uses small files called “cookies” to improve your experience and to enable CHCG to distinguish you from other users. The cookies we use are ‘analytical’ cookies allowing CHCG to recognise and count the number of visitors and to see how visitors move around the site when they are using it. This helps CHCG to improve the way the website works. 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 CHCG’s website may become inaccessible or not function properly.
- **Third parties or publicly available sources.**  
We may receive personal data about you from various third parties:  
Technical Data from analytics providers (such as Google).  
Contact, Financial and Transaction Data from providers of technical, payment and delivery services (such as *PayPal*).

#### 4. How we use your personal data

We will only use your personal data when the law allows us to and for the purpose of administering CHCG.

#### 5. Disclosures of your personal data

CHCG may have to share your personal data with the following parties:

- Service providers acting as Data Processors based in the UK who provide administration services to CHCG.
- Service providers acting as Data Processors based outside the UK who provide analytical services to CHCG.
- Professional advisers acting as processors including lawyers, bankers, accountants, auditors and insurers based in the UK who provide consultancy, banking, legal, insurance and accounting services.
- HM Revenue & Customs, regulators and other authorities acting as processors or joint controllers based in the United Kingdom who require reporting of processing activities in certain circumstances.

CHCG requires all third parties to respect the security of your personal data and to treat it in accordance with the law. It does not allow third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with CHCG's instructions.

## 6. International transfers

Where CHCG may use third parties based in the United States of America, it may transfer data to them if they are part of the Privacy Shield which requires them to provide similar protection to personal data shared between the Europe and the United States of America.

## 7. Data security

CHCG has 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, CHCG limits access to your personal data to those trustees and elected officers who have a need to know. They will only process your personal data on CHCG's instructions and they are subject to a duty of confidentiality.

CHCG has put in place procedures to deal with any suspected personal data breach and will notify you and the Information Commissioner's Office of a breach where it is legally required to do so.

## 8. Data retention

CHCG will only retain your personal data for as long as necessary to fulfil the purposes for which it was collected, including for the purposes of satisfying any legal, accounting, or reporting requirements.

By law CHCG must keep basic information about its members and customers (including Contact, Identity, Financial and Transaction Data) for six years after they cease being customers for tax purposes.

## 9. Your legal rights

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

- **Request access to your personal data.** This enables you to receive a copy of the personal data CHCG holds about you and to check that it is lawfully processing it.
- **Request correction of your personal data.** This enables you to have any incomplete or inaccurate data CHCG holds about you corrected.
- **Request erasure of your personal data.** This enables you to ask CHCG to delete or remove personal data where there is no good reason for CHCG continuing to process it. You also have the right to ask CHCG to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where CHCG may have processed your information unlawfully or where CHCG is required to erase your personal data to comply with local law. Note, however, that CHCG may not always have to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

- **Object to processing of your personal data** where CHCG is relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where CHCG is processing your personal data for direct marketing purposes. In some cases, CHCG may demonstrate that it has compelling legitimate grounds to process your information which override your rights and freedoms.
- **Request restriction of processing your personal data.** This enables you to ask CHCG to suspend the processing of your personal data in the following scenarios:
  - (a) if you want us to establish the data's accuracy;
  - (b) where our use of the data is unlawful but you do not want us to erase it;
  - (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or
  - (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.
- **Request transfer of your personal data** to you or to a third party. CHCG will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for CHCG to use or where it used the information to perform a contract with you.
- **Right to withdraw consent** where CHCG is relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, CHCG may not be able to provide certain products or services to you. CHCG will advise you if this is the case at the time you withdraw your consent.

If you wish to exercise any of the rights set out above, please contact our Data Protection Lead at [data.protection@chcg.org.uk](mailto:data.protection@chcg.org.uk).

### **Time limit to respond**

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