

Castlemilk Moorit Sheep Society Privacy policy

1. Introduction

1.1 We are committed to safeguarding the privacy of members and website users; in this policy we explain how we will handle your personal data.

1.2 Our website does not use cookies.

1.3 This privacy policy was last updated on 1 April 2020

2. How we use your personal data

2.1 In this Section 2 we have set out:

- (a) the general categories of personal data that we may process;
- (b) the purposes for which we may process personal data; and
- (c) the legal bases of the processing.

2.2 We may process your membership account data ("**account data**"). The account data may include your name, address, telephone number and email address. The source of the account data is you. The account data may be processed for the purposes of providing our services (eg breed promotion, newsletters, finding stock for sale), maintaining back-ups of our databases and communicating with you. The legal basis for this processing is consent.

2.3 We may process information that you send for posting for publication on our website or through our services ("**publication data**"). The publication data may be processed for the purposes of enabling such publication and administering our website and services. The legal basis for this processing is consent OR our legitimate interests, namely the proper administration of our website.

2.4 We may process information contained in any enquiry you submit to us regarding our services ("**enquiry data**"). The enquiry data may be processed for the purposes of offering services to you eg kinship reports. The legal basis for this processing is consent.

2.5 We may process [information contained in or relating to any communication that you send to us ("**correspondence data**"). The correspondence data may be processed for the purposes of communicating with you and record-keeping. The legal basis for this processing is our legitimate interests, namely the proper administration of our website and services and communications with members.

2.6 We may process any of your personal data identified in the other provisions of this policy where necessary for the establishment, exercise or defence of legal claims, whether in court proceedings or in an administrative or out-of-court procedure. The legal basis for this processing is our legitimate interests, namely the protection and assertion of our legal rights, your legal rights and the legal rights of others.

- 2.7 In addition to the specific purposes for which we may process your personal data set out in this Section 3, we may also process any of your personal data where such processing is necessary for compliance with a legal obligation to which we are subject, or in order to protect your vital interests or the vital interests of another natural person.
- 2.8 Please do not supply any other person's data to us as we need their explicit consent to hold it.

3. Providing your personal data to others

- 3.1 We may disclose your personal data to our insurers and/or professional advisers insofar as reasonably necessary for the purposes of obtaining and maintaining insurance coverage, managing risks, obtaining professional advice and managing legal disputes.
- 3.2 Financial transactions relating to our membership services may be handled by a secure payment services provider, currently *Square*. We will share transaction data with our payment services providers only to the extent necessary for the purposes of processing your payments, refunding such payments and dealing with complaints and queries relating to such payments and refunds. You can find information about the payment services providers' privacy policies and practices below:

<https://squareup.com/qb/en/legal/general/privacy-no-account>

- 3.3 In addition to the specific disclosures of personal data set out in this Section 4, we may also disclose your personal data where such disclosure is necessary for compliance with a legal obligation to which we are subject, or in order to protect your vital interests or the vital interests of another natural person.

4. International transfers of your personal data

- 4.1 In this Section 5, we provide information about the circumstances in which your personal data may be transferred to countries outside the European Economic Area (EEA).
- 4.2 You acknowledge that personal data that you submit for publication through our website or services may be available, via the internet, around the world. We cannot prevent the use (or misuse) of such personal data by others.

5. Retaining and deleting personal data

- 5.1 This Section 6 sets out our data retention policies and procedure, which are designed to help ensure that we comply with our legal obligations in relation to the retention and deletion of personal data.
- 5.2 Personal data that we process for any purpose or purposes shall not be kept for longer than is necessary for that purpose or those purposes.

5.3 We will retain and delete your personal data as follows:

- a) *personal account data* will be retained while you remain a member of the society or continue to make payments/donations to the society. Once you leave the society it will be retained for 3 years at the end of which period it will be deleted from our systems.
- b) Notwithstanding the other provisions of this Section 6, we may retain your personal data where such retention is necessary for compliance with a legal obligation to which we are subject, or in order to protect your vital interests or the vital interests of another natural person.

6. Amendments

6.1 We may update this policy from time to time and will advise the existence of a new version in the newsletter and on our website.

7 Your rights

7.1 You may instruct us to provide you with any personal information we hold about you; provision of such information will be subject to:

- (a) the payment of a fee (currently fixed at GBP 10); and
- (b) the supply of appropriate evidence of your identity (for this purpose, we will usually accept a photocopy of your passport certified by a solicitor or bank plus an original copy of a utility bill showing your current address).

7.2 We may withhold personal information that you request to the extent permitted by law.

7.3 We will never process your personal information for marketing purposes.

7.4 In this Section 8, we have summarised the rights that you have under data protection law. Some of the rights are complex, and not all of the details have been included in our summaries. Accordingly, you should read the relevant laws and guidance from the regulatory authorities for a full explanation of these rights.

7.5 Your principal rights under data protection law are:

- (a) the right to access;
- (b) the right to rectification;
- (c) the right to erasure;
- (d) the right to restrict processing;
- (e) the right to object to processing;
- (f) the right to data portability;
- (g) the right to complain to a supervisory authority; and
- (h) the right to withdraw consent.

- 7.6 You have the right to confirmation as to whether or not we process your personal data and, where we do, access to the personal data, together with certain additional information. That additional information includes details of the purposes of the processing, the categories of personal data concerned and the recipients of the personal data. Providing the rights and freedoms of others are not affected, we will supply to you a copy of your personal data. The first copy will be provided free of charge, but additional copies may be subject to a reasonable fee.
- 7.7 You have the right to have any inaccurate personal data about you rectified and, taking into account the purposes of the processing, to have any incomplete personal data about you completed.
- 7.8 In some circumstances you have the right to the erasure of your personal data without undue delay. Those circumstances include: the personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed; you withdraw consent to consent-based processing; the processing is for direct marketing purposes; and the personal data have been unlawfully processed. However, there are certain general exclusions of the right to erasure. Those general exclusions include where processing is necessary: for exercising the right of freedom of expression and information; for compliance with a legal obligation; or for the establishment, exercise or defence of legal claims.
- 7.9 In some circumstances you have the right to restrict the processing of your personal data. Those circumstances are: you contest the accuracy of the personal data; processing is unlawful but you oppose erasure; we no longer need the personal data for the purposes of our processing, but you require personal data for the establishment, exercise or defence of legal claims; and you have objected to processing, pending the verification of that objection. Where processing has been restricted on this basis, we may continue to store your personal data. However, we will only otherwise process it: with your consent; for the establishment, exercise or defence of legal claims; for the protection of the rights of another natural or legal person; or for reasons of important public interest.
- 7.10 You have the right to object to our processing of your personal data on grounds relating to your particular situation, but only to the extent that the legal basis for the processing is that the processing is necessary for: the performance of a task carried out in the public interest or in the exercise of any official authority vested in us; or the purposes of the legitimate interests pursued by us or by a third party. If you make such an objection, we will cease to process the personal information unless we can demonstrate compelling legitimate grounds for the processing which override your interests, rights and freedoms, or the processing is for the establishment, exercise or defence of legal claims.
- 7.11 You have the right to object to our processing of your personal data for scientific or historical research purposes or statistical purposes on grounds

relating to your particular situation, unless the processing is necessary for the performance of a task carried out for reasons of public interest.

- 7.12 To the extent that the legal basis for our processing of your personal data is consent, and such processing is carried out by automated means, you have the right to receive your personal data from us in a structured, commonly used and machine-readable format. However, this right does not apply where it would adversely affect the rights and freedoms of others.
- 7.13 If you consider that our processing of your personal information infringes data protection laws, you have a legal right to lodge a complaint with a supervisory authority responsible for data protection. You may do so in the EU member state of your habitual residence, your place of work or the place of the alleged infringement.
- 7.14 To the extent that the legal basis for our processing of your personal information is consent, you have the right to withdraw that consent at any time. Withdrawal will not affect the lawfulness of processing before the withdrawal.
- 7.15 You may exercise any of your rights in relation to your personal data by written notice to us, in addition to the other methods specified in this Section 8.

8 Third party websites

- 8.1 Our website may include hyperlinks to, and details of, third party websites.
- 8.2 This privacy policy only governs our website and we are not responsible for the privacy policies that govern third party websites even where we have provided links to them. If you use any link on our website we recommend you read the privacy policy of that website before sharing any personal or financial data
- 8.3 We operate a number of social media pages including Facebook and Instagram. Although this policy covers how we will use any data collected from those pages it does not cover how the providers of social media websites will use your information. Please ensure you read the privacy policy of the social media website before sharing data and make use of the privacy settings and reporting mechanisms to control how your data is used.

9 Personal data of children

- 9.1 Our website and services are targeted at persons over the age of 16.
- 9.2 If we have reason to believe that we hold personal data of a person under that age in our databases, we will delete that personal data.

10 Updating information

- 10.1 Please let us know if the personal information that we hold about you needs to be corrected or updated.

11 Our details

11.1 Our website is owned and operated by Castlemilk Moorit Sheep Society.

11.2 We are a not-for-profit society run by volunteers.

11.3 Our principal correspondence address is 50 Rugby Road, Barby, Warwickshire CV23 8UB.

11.4 You can contact us:

- (a) by post, using the postal address given above;
- (b) using our website contact form;
- (c) by telephone, on the contact number numbers published on our website;
- (d) by email, using the email address published on our website.

12 Data protection officer

12.1 Our data protection officer's contact details are:
castlemilkmoorit@hotmail.co.uk; please put Data Protection as the subject line.

13 Complaints

13.1 You can make any complaints about our handling of personal data to the Information Commissioner Office at ico.org.uk