



# NFHS Privacy Notice

## 1. Policy Statement

Northamptonshire Family History Society (NFHS) is committed to preserving the privacy of all whose data it processes and of every visitor to its Website. Please read this privacy notice to understand how we use and protect the personal information that you provide to us.

This privacy notice tells you what to expect when NFHS collects personal information. It applies to information we collect about:

- members who use our services, eg who receive our quarterly journal, Footprints, subscribe to our e-newsletter, submit their Members Name Interests or request a publication from us;
- visitors to our website;
- any party with whom we interact;
- any member of the public who makes contact with us or requests a service;

## 2. Legal Basis

Under the GDPR, the Society is obliged to declare the *legal basis* for its processing of personally identifiable data.

It has been determined that the legal basis for the majority of the Society's data processing will be '*legitimate Interests*' (clause 6(1)(f)) except where there arises the necessity to send PID relating to members of the public to members who are domiciled outside the EU, in which case '*granular consent*' will be sought. Also, as it is customary for NFHS to publish the contact details of new members in its journal Footprints, which is sent to members in both the UK and overseas, granular consent will be sought in respect of all new members as part of the membership sign-up process. The bases as described above will cover any/all data currently being processed, or, so far as can be foreseen, are likely to be processed in the future.

## 3. Purpose / Legitimate Interests

Under the GDPR, the Society is obliged to declare the *purpose* of its data processing. NFHS has determined that the purpose of the processing, and therefore the *legitimate interest*, is '*to facilitate the delivery of the 'Footprints' journal and other services/correspondence to its members and the transaction of business with others with whom it from time to time may interact.*'

## 4. Responsible Persons

For the purposes of the General Data Protection Regulation (GDPR) there are joint Data Controllers. They are the Chairman of the Society and the Membership Secretary. The Data Processor is the Membership Secretary. Their contact details can be found on the Contacts tab on the Society website at [www.northants-fhs.org](http://www.northants-fhs.org) and on the inside cover of the Footprints journal.



## 5. Data Subject's Rights

Under the GDPR, an individual (data subject) has the following rights:

- The right to be informed
- The right of access
- The right to rectification
- The right to erasure
- The right to restrict processing
- The right to data portability
- The right to object
- Rights in relation to automated decision making and profiling.

## 6. Access to personal information

NFHS tries to be as open as it can be in terms of giving people access to their personal information. Under the GDPR Individuals can ascertain if we hold personal information about them by making a 'subject access request' (SAR). If we are holding information about you we will:

- give you a description of it;
- tell you why we are holding it;
- tell you who it could be disclosed to; and
- let you have a copy of the information in an intelligible form.

A request for a statement of any personal information we may hold about you, should be made in writing, addressed to our Membership Secretary at the address shown below.

## 7. Visitors to our website

When you visit our website, we collect information about your IP address and the pages you visit. This helps us to understand which areas of our website are most useful to our visitors and to make improvements. This does not tell us who you are and where you live.

No personal data is used or stored on the northants-fhs.org website

### *Use of cookies by NFHS*

You can read about how we use cookies on the 'Small Print' page of our website.

### *Security and performance*

We use third-party services to help maintain the security and performance of our website. Delivery of this service necessitates the processing of IP addresses of visitors to our website. No one is identified however in the course of this processing.

### *People who contact us via social media*

We use third-party providers, Facebook and Twitter to manage our social media interactions.

Private or direct messages we receive via social media will be stored by Facebook or Twitter under their Terms and Conditions. They will not be shared with any other social media platforms that we may use.

## 8. Disclosure

New members' contact details are published in the membership section of the Society's quarterly journal, 'Footprints', unless it is specifically requested that such information is withheld.



We will make every effort to preserve your privacy, but we may be obliged to disclose information, where required to do so by law.

### *.01 Contact Request*

Where a member of the public, as a result of having seen members' name-interest postings on the Society website, is desirous of making contact with a member, if the enquirer lives outside the EU, his/her contact details would be forwarded to the member to allow said member the opportunity of making first contact with the enquirer (if, however, the enquirer lives within the EU, his/her consent to send his/her PID outside the EU would first be sought — refer to 'Contact Request — PID Transmittal Consent' form).

Members are identified by their member number only on the website — contact details are not disclosed on the website. Thus, the member's privacy is upheld and the right of the member to make contact only if he/she wishes to do so is preserved.

## **9. E-newsletter**

We publish a monthly e-newsletter which is edited, produced and distributed in-house with no outside involvement. We do not gather statistical data associated with the e-newsletter.

## **10. People who use NFHS services**

NFHS offers various services to the public. We use Genfair and Parish Chest, as third-parties, as a shop front for book sales and membership renewals online, but such third parties are only allowed to use the personal information collected to process sales and online membership applications/subscription renewals.

FindMyPast make available, on our behalf, some of our databases (relating to deceased persons only).

It is necessary for us to hold the details of the people who have requested a service, in order to provide it. Except as in section 8 above, we only use these details to provide the service the person has requested.

## **11. Complaints**

NFHS strives to meet the highest standards when collecting and using personal information. For this reason, we take any complaints we receive about this very seriously. We encourage people to bring it to our attention if they think that our collection or use of information is unfair, misleading or inappropriate.

Complaints in the first instance should be addressed to the Membership Secretary at the address shown below or on our website, on the inside cover of the Footprints journal or in the members' handbook.

NFHS Membership Secretary  
52 Russell Way  
Higham Ferrers  
Northants NN10 8EJ

Information relating to a complaint will be retained for two years from closure. It will be retained in a secure environment and access to it will be restricted according to the 'need to know' principle.

You are also at liberty to make a complaint to the supervising authority, the *Information Commissioner's Office*.



For more information about making a complaint, please see the appropriate section of our *Privacy Policy*.

## 12. **Q**ue ries

This privacy notice was drafted with brevity and clarity in mind. It does not provide exhaustive detail of all aspects of the collection and use of personal information by NFHS. For further, more detailed, information about this, please refer to the NFHS Privacy Policy which can be found on our website or obtained from the membership secretary at the address shown above.

EndDoc Ref	Issue Date	Remarks
MS_PrivNot_V2_20170625	25-06-17	Draft
MS_PrivNotV3_20170629	29-06-17	Rev 1
MS_PrivNotV4_20170730	16-08-17	Cover page removed, Legal Basis, Data Controller/Processor details, individual's rights and consent added.
MS_PrivNotV5_20170823		Legal basis changed; Consent deleted.
MS_PrivNotV5_20171221		Legal basis changed and added to priv notice
MS_PrivNotV6_20171222		Legal basis changed and added to priv notice
MS_PrivNotV7_20180211	12/02/18	General amendment following sub-comm mtg 07/02/18.
MS_PrivNotV8_20180428	26/04/18	Consent and Contact Request added

**Agreed at the Exec Committee Meeting held on .....**

Signed

..... Angela Malin — Chairman

Date .....

..... Keith Steggles — Secretary

Date .....