



# NFHS Privacy Policy

How NFHS processes, uses and protects its members' data

This document is the Privacy Policy of the Northamptonshire Family History Society.

## Policy Statement:

NFHS is committed to preserving the privacy of all whose data it processes and of every visitor to its Website.



# NFHS Privacy Policy

How NFHS processes, uses and protects its members' data

## 1. Definition of Terms

**The Society/we/us** Northamptonshire Family History Society (NFHS)

**Data Subjects/you** Living individuals whose personal details are processed

**Data Controller** The person (or persons) who determine(s) the purpose for which and for how long the personal data are processed/kept and the means by which they are processed.

**Data Processor** The person who processes/keeps data on behalf of a data controller.

**Footprints** The quarterly journal produced and distributed by NFHS

**Sensitive data** Data classified under the GDPR as 'sensitive' e.g. about a person's health or criminal record

## 2. General Data Protection Regulation

Although due to leave the EU, the UK had previously committed to replacing the Data Protection Act (DPA) with the General Data Protection Regulation (GDPR), in order to comply with EU law, effective from 25 May 2018.

Our aim is to be fully compliant with the GDPR.

## 3. Registering with the Information Commissioner's Officer

NFHS, like almost every other family history society, is an **unincorporated association** administered by a committee for the benefit of its members and as such it will, of necessity, hold information on its members as well as on other persons who are not members including companies or other societies/contacts.

NFHS, as a typical family history society, under the GDPR, is not obliged to register with any supervisory authority. However, as a processor of personal data, if challenged by either such an authority or by a data subject, under the 'accountability' principle, must be able to demonstrate compliance with the GDPR.

## 4. Policy Statement

NFHS is committed to preserving the privacy of all whose data it processes and of every visitor to its Website.



## 5. Policy Overview

### *.01 Processing and use of personally identifiable data*

We collect personal information from visitors to our website; people who apply to become Members, make a purchase or donation and from others with whom we may from time to time interact. We do this both electronically and/or in paper format.

In addition, we also collect details automatically about the pages you visit on our website. Please see our Cookies policy in the 'Small Print' section of our website for more information.

In choosing to share your personal information with us, you will be agreeing to our collection and use of your information as described in this policy.

If you no longer want us to process your personal details you can ask us to stop at any time by contacting [membership@northants-fhs.org](mailto:membership@northants-fhs.org)

### *.02 The legal basis for the processing of personal data by NFHS*

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.

### *.03 We use the information you share with us to:*

- Make sure you receive the product, service or information you have requested or bought;
- Carry out reasonable administration of your membership, donations, bookings and other services.

For details of how we do this please continue reading.

### *.04 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.

### *.05 What information we must provide and when*

We aim to provide all the information we are legally obliged to at the point where an individual applies to join the Society, before we collect data, i.e. on our website and on the application form.



## *.06 Policy Updates*

We will need to make changes to this policy from time to time, to make sure that we are always providing you with the latest information about what is happening to your personal information.

This policy was last updated on 06/06/2018.

## 6. What information we collect and how

### *.01 Personally identifiable data*

We collect personal information about you that helps us to deliver and improve our services. This includes:

- Name and address
- Email address and telephone numbers
- Payment information such as credit card and bank details
- Details of purchases, membership, Gift Aid Declarations and donations
- Interaction with our social media pages

### *.02 Visitors to NFHS website*

When people visit [www.northants-fhs.org](http://www.northants-fhs.org) we use third-party services to collect standard internet log information and details of visitor behaviour patterns. We do this in order to ascertain such things as the number of visitors to the various parts of the site, which helps us to understand which areas of our website are most useful to our visitors and make improvements. This information is processed in such a way that no one is identified. We make no attempt to ascertain identities of visitors to our website.

No personal data is used or stored on the [northants-fhs.org](http://northants-fhs.org) website

### *.03 Use of cookies by NFHS*

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

### *.04 Security and performance*

We use a third-party service 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.

### *.05 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.



### *.06 Sensitive data*

We do not collect, process or keep data which under the GDPR is in any way considered as 'sensitive'. It is deemed unnecessary therefore for NFHS to appoint a Data Protection Officer.

## 7. Data Subjects' 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.

## 8. What do we do with your information?

### *.01 Processing*

We will make sure that you receive the product or service you have requested, process any payments and send you information relating to that service.

If you have joined as a Member this will include sending you confirmation of your purchase and membership materials such as Members' Handbook, information on how to use your membership, our quarterly journal 'Footprints' and email newsletters. We will also send you information about membership renewal.

We will also do our best to keep your information up to date. Please do let us know if your postal or e-mail address or telephone number have changed.

### *.02 Marketing and communications*

We will not send you marketing material of any description.

We may contact you by post or by e-mail. We prefer the latter in order to minimise postage costs.

### *.03 Data Source and Customer profiling*

NFHS only collects/processes data which is obtained directly from you, the data subject, and does not employ automated decision making or profiling.

We do not collect data that has not been consciously provided i.e that is *observed, derived or inferred*.



#### *.04 Who will have access to my information (Disclosure)?*

Your information will only be accessible to our nominated officers, and only where it is appropriate, in order for them to carry out their role in line with this Privacy Policy.

We will never sell or unlawfully pass on your personal data or allow other organisations use it for their own purposes.

We will only share your personal information where:

- We are legally required to, or as a result of a lawful request by a governmental or law enforcement authority;
- You give us explicit consent for us to do so;

Our website may contain links to other websites that are outside our control and are not covered by this Privacy Policy. If you access other sites using the links provided, the operators of these sites may collect information from you that will be used by them in accordance with their privacy policy, which may differ from ours.

#### *.05 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 also to for '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. Access to personal data

NFHS tries to be as open as it can be in terms of giving people access to their personal information.

#### *.01 Information an individual is entitled to obtain*

- confirmation that their data is being processed;
- access to their personal data; and
- other supplementary information.

#### *.02 Subject Access Request (SAR)*

Individuals can ascertain if we hold personal information about them by making a 'subject access request' (SAR) under the GDPR. 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.

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 at the end of section 14 below.

### *.03 Format of Response to a Subject Access Request*

Information we provide, in response to a SAR received electronically, will be in like manner, and in a commonly used format. SARs received by letter will be responded to in like format.

### *.04 Requests which are manifestly unfounded or excessive*

Where requests are manifestly unfounded or excessive, in particular because they are repetitive, NFHS will:

- charge a reasonable fee, taking into account the administrative costs of providing the information; or
- refuse to respond.

### *.05 Time to comply*

NFHS will comply with a 'subject access request' within one month of receipt.

## 10. Rectification of Personal Data

Individuals are entitled to have personal data rectified if it is inaccurate or incomplete, within one month of request.

- NFHS will rectify data if/when requested to do so by an individual and will advise if the data has been passed to a third party, within one month of receipt of the request.

## 11. Security of Processing

Having regard to the state of the art and the cost of their implementation, the Society/controller has implemented appropriate technical and organisational measures to ensure a level of security appropriate to the risks represented by the processing and the nature of the personal data to be protected. Such measures are taken in particular to prevent any unauthorised disclosure or access, accidental or unlawful destruction or accidental loss, or alteration, and to prevent all other unlawful forms of processing.

The membership database is kept on a home PC and is backed up regularly to a secure external device and weekly to a flash drive which is kept remotely from the main device.

## 12. Retention of Data

To accord with GDPR principles all financial records containing details of members' names and addresses, in particular their membership subscriptions, however paid, will be kept for seven years. They may be stored on paper and/or electronically.



Paper records will be kept for a period of two years after which time they may be scanned to an electronic means of storage (the paper thereafter being destroyed) for storage for a further five-year period, after which time they will be deleted/destroyed whether electronic or paper. See also our Data Retention Policy.

### 13. Other Considerations

The Society holds other data as a result of its project work. Where transcription of parish registers is concerned the Society operates a cut-off date of 1912. This ensures that no data is held relating to the birth or marriage of any living person.

In churchyards and cemeteries, the majority of memorial inscriptions recorded by NFHS relate to a deceased person, although reference may be made to a relative (i.e. spouse) who is still alive at that time. However, as the headstone would bear no contact details, the person cannot be identified and thus the GDPR does not apply.

### 14. 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.

When we receive a complaint, details of the complaint are logged. This normally includes the identity of the complainant and any other individuals involved in the complaint.

We will only use the personal information we collect to process the complaint and to check on the level of service we provide.

It is usually necessary to disclose the complainant's identity to whoever the complaint is about. This is inevitable where, for example, the accuracy of a person's record is in dispute. If a complainant does not want information identifying him or her to be disclosed, we will try to respect that. However, it may not be possible to handle a complaint on an anonymous basis.

Personal information contained in complaint files will be kept only for as long as is necessary to resolve a complaint and in line with our retention policy. This means that 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.

Membership Secretary:        Mr Peter W Brown  
   52 Russell Way  
   Higham Ferrers  
   Northants NN10 8EJ

End



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Doc Ref	Issue Date	Remarks
MS_DPP_GDPR_V2_20170727	20-07-17	Draft
MS_PP_GDPR_V1_20170727	27/07/2017	Name changed to Privacy Policy
MS_PP_GDPR_V2_20170823		Legal basis changed; Consent deleted.
MS_PP_GDPR_V4_20180102		Registration section changed; Legal basis changed.
MS_PrivPolV4_20180102.docx		General update and change to file name.
MS_PrivPolV5_20180211.docx	12/02/18	General amendment following sub-comm mtg 07/02/18.
MS_PrivPolV6_20180428.docx	26/04/18	Consent and Contact Request added

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

Signed

..... Angela Malin — Chairman                      Date .....

..... Keith Steggle — Secretary                      Date .....