



PRIVACY POLICY

WHO WE ARE?

At Dymchurch District Royal British Legion Club Limited (IP21756R), we are a private members club operating under license to use the Royal British Legion's name and logo. We are registered with the Prudential Regulation Authority in accordance with the Co-operative and Community Benefit Societies Act 2014.

Our registered address is:

Memorial Hall
Sea Wall
Dymchurch
Romney Marsh
Kent TN29 0TG

We understand that your privacy is important to you and that you care about how your personal data is used and shared. We respect and value the privacy of all employees, members and guests who visit the Club premises and will only collect and use data in ways that are described here, and in a manner that is consistent with our obligations and your rights under the law.

Please read this Privacy Policy carefully and ensure that you understand it. Your acceptance of our Privacy Policy is deemed to occur when you become a member or employee. If you do not agree with this Privacy Policy, you should resign your membership immediately or not accept any job offer.

DEFINITIONS AND INTERPRETATIONS

In this Policy, the following terms shall have the following meanings:

“Dymchurch RBL Club/the Club/the Legion/We/Us/Our” means Dymchurch District Royal British Legion Club Limited, a private members club whose registered address is given above.

“The Royal British Legion” means The Royal British Legion, Registered Charity Number 219729

“Member” means any person who is a current financial member of the Dymchurch RBL Club and the Royal British Legion. Members must hold a current Royal British Legion membership or join the Royal British Legion to be a Club member.

“Guest” means a visitor to the Club who has been signed in by a current financial member.

“Employee” means any person employed by the Club.



“Personal Data” means any and all data that relates to an identifiable person who can be directly or indirectly identified from that data. In this case, it means personal data that you give us when becoming an employee, a member or via our website or social media. This definition shall, where applicable, incorporate the definitions provided in the General Data Protection Regulation 2016/679 ("GDPR") and legislation under the Data Protection Act 2018

INFORMATION ABOUT US

Dymchurch District Royal British Legion Club Limited maintain records of all employees, members, operate and maintain the website at www.dymchurchlegion.co.uk and the social media page at www.facebook.com/DymchurchRBL.

WHAT DOES THIS POLICY COVER?

This policy applies only to our use of your data as employees, for membership purposes, the use of our website and our Facebook page. We may provide links to other sites on our website and social media pages for convenience and for informational purposes only. We do not endorse or approve any products, services or opinions expressed on such other websites. We have no control over how your data is collected, stored or used by other websites and we advise you to check the privacy policies of any such websites before providing any data to them.

DATA WE COLLECT

When you complete a membership application to join the Club, apply for employment, ask for information about the Club, visit our website or follow us on social media we collect data about you and your visit.

Data we collect from you or third parties.

We may collect some or all of the following data either directly from you or via third parties:

- Personal details (e.g. name, salutation, title, date of birth, gender)
- Contact details (e.g. email address, telephone number, mobile number, address and emergency contact information)
- Health details, where applicable
- Government issued documents (e.g. passport, identity card, social security numbers, driver's licenses and immigration cards)
- Financial Information (e.g. bank information)
- Information via public record



- Employment application details (e.g. name, employment history, telephone number, address, email address, education history and immigration status)

Data collected by us when applying for membership or employment may include data about yourself and other third parties. By providing us with personal data of any third party, you confirm that you have the authority to do so on their behalf and have provided them with the information set out in this privacy policy.

We operate closed circuit television (CCTV) cameras within the club premises, including access points and throughout public areas. These CCTV cameras record continually and images of you may appear in these recordings.

Data we collect automatically

When you access our website we automatically collect some categories of data from you, including data collected using cookies and other device tracking technologies (Cookies and Tracking Technologies). Further information about our use of Cookies and Tracking Technologies is available on our website.

Data we do not collect

The Club does not collect any information relating to credit card transactions whilst in the Club or retain bank account information submitted via the Royal British Legion membership application form. Credit card transactions are processed on our behalf by Worldpay and their data privacy notice is available at: <https://www.worldpay.com/uk/worldpay-privacy-notice>. The Royal British Legion data privacy policy is available at: <https://www.britishlegion.org.uk/about-us/our-privacy-policy-and-promise>.

HOW WE USE PERSONAL DATA

All personal data is processed and stored securely, for no longer than is necessary and our use of your personal data will always have a lawful basis, either as a Club employee or a Club member.

We may use your personal data for the following purposes:

Identify and authenticate you: We may use your personal data to verify your identity when you become a member or apply for employment and to ensure the security of your personal data. We do this to comply with our legal obligations to you.

Provide you with services: We process your personal data to provide membership services to you as required under the Co-operative and Community Benefit Societies Act 2014.

Advertise and marketing: If you have consented we may use your personal data to notify you or to market upcoming events, promotions and services related to your membership of the club by your preferred contact method. It is in our legitimate interest to provide relevant advertising to promote the Club to our individual members.

Communicate with you: We may use your personal data to communicate with you, for example if we are providing you information regarding changes to Club rules, the status of your membership or if you have contacted us with questions. It is our legitimate interest to provide you with appropriate responses and provide you with notices about Club business.



Exercise our rights: We may use your personal data to exercise our legal rights where it is necessary to do so, for example to detect, prevent and respond to legal claims, rule violations or our applicable membership/contract terms and conditions.

Comply with our obligations: We may process your personal data to, for example, carry out employment screening checks or comply with applicable legal or regulatory requirements, where explicitly required by law.

Ensure the safety of employees, members, visitors and guests: We may process your data to ensure the safety and security of all persons within the Club premises should this be necessary.

Evaluate your potential employment: We may process your personal data if you apply for a position as a member of staff with us including making enquiries with regard to employment/education history and professional and personal references.

HOW WE DISCLOSE PERSONAL DATA

The Royal British Legion: We may share your personal data to ensure we meet our membership obligations under the club license issued to us by the Royal British Legion.

Where required by law: We may provide certain personal data to governmental and recognised law enforcement agencies as required by law to comply with our legal obligations.

To protect our rights or the rights of a third party: We may share your personal data to identify, investigate, contact or bring legal action against an individual who may be causing injury or interference with our rights or property or the rights or property of a third person if we believe in good faith that disclosing this personal information is necessary or advisable. Personal data about you may also be shared with governmental or recognised law enforcement agencies in order to prevent and detect crime as well as to safeguard children and vulnerable adults.

INFORMATION SECURITY

We implement physical, technical and organisational security measures designed to safeguard the personal data we process. These measures are aimed at providing ongoing integrity and confidentiality for your personal data. We evaluate and update the measures on a regular basis.

DATA RETENTION

We retain your personal data for as long as we have a relationship with you and such relationship includes any request to receive marketing information. When deciding how long to keep your personal data after our relationship has ended, we take into account our legal obligations, including requirements of regulators and government that have authority over us. We may also retain records to investigate or defend against potential legal claims.

Where we have a legitimate interest to retain data beyond our relationship for other reasons, we will only retain information relevant to that interest.

We will delete your personal data when it is no longer required for these purposes.



MANAGING YOUR PRIVACY SETTINGS

All electronic communications you receive from us will include specific instructions on how to unsubscribe and you may also unsubscribe at any time taking the one of the following steps:

1. Email the Club Secretary: suerbldymchurch@hotmail.co.uk
2. Send mail to the following address:

Secretary
Dymchurch RBL Club Limited
Memorial Hall
Sea Wall, Dymchurch
Romney Marsh
Kent TN29 0TG

Please allow up to 2 weeks to be unsubscribed from all electronic communications.

To remove notifications received as a result of following or liking the Club Facebook page please unfollow or unlike the page. We do not collect or retain any personal data from Facebook.

YOUR RIGHTS

As a data subject you have certain rights regarding your personal data, subject to local data protection laws. These include the following rights:

- To be informed about our collection and use of personal data
- Access your personal data
- Rectify the data we hold about you
- Erase your personal data
- Right to restrict our use of your personal data
- Receive your data in a usable electronic format and transmit it to a third party (right to portability)
- Lodge a complaint with us or your local data protection authority

If you would like to discuss or exercise these rights, please contact us at the details above. We encourage you to contact us to update or correct your data if it changes or if the personal data we hold about you is inaccurate. To avoid disclosure or changes being made to your data fraudulently we would require proof of identification prior to executing any changes. Any data subject access requests will be responded to within 30 days.

CHILDREN

We do not intentionally collect personal data from children under 16 under than when provided by parents for our annual Christmas party and then only name and age. By providing this



Dymchurch District Royal British Legion Club Limited

information the parent consents to the use of this information to purchase appropriate age-related gifts. This data is destroyed once the gifts are purchased.

We do not process personal data about children for any other purpose nor do we seek to collect personal data about children. If you have reason to believe we or any of our employees have collected personal data from someone under 16 years of age other than as stated above, please let us know by contacting us at suerbldymchurch@hotmail.co.uk.

HOW TO CONTACT US

If you have any questions, comments, or concerns about how we handle your personal data, then you may contact us using the details located in the Manage Your Privacy Settings section.

PRIVACY POLICY UPDATES

We may update this privacy policy from time to time without prior notice. You can determine when this privacy policy was last revised by checking the effective date and version number. We encourage you to periodically review this privacy policy to ensure you understand our privacy practices.

If we make any revisions that materially change the ways in which we process your personal data, we will notify you of these changes before applying them to that personal data.

If you would like to request a printed copy of this privacy policy, please speak to a committee member.

Approved at Committee
20th May 2018