

# DATA PRIVACY NOTICE

The Worshipful Company



of Launderers

**25 May 2018**

## **1. The Worship Company of Launderers Policy and Summary**

The Worshipful Company of Launderers (WCL), including the Worshipful Company of Launderers Benevolent Trust Fund has a Data Protection Policy that has been agreed by the Court. This can be read by scrolling down this document or asking in the Clerk's office for a copy. This document is a product of that policy. The EU General Data Protection Regulation (GDPR) and PECR are the main stem of Data Protection provisions within UK and this Company will comply with all relevant legislation. In view of GDPR it has been agreed by the Court that the following practices will be adopted:

For Members of the Company: a listing of members will be maintained with email contact details; this will enable all Company notices to be promulgated including Health and Safety notices as well as just general Company notices of functions and opening times for the Company, offices and other City functions. This will be done under the auspices of **Legitimate Interest**.

For employees of the Company as well as contractors; the auspices of **contract** from each contracted person/entity will be used for holding their data. The members of WCL who assume a position of responsibility, such as a place on the Court, will, as part of their role, have their contact details recorded and kept by the Clerk under the auspices of **Legitimate Interest**. The minimum of personal details will be disseminated to members and displayed in accordance with performance of the role's responsibilities.

It may be necessary to pass personal data to third parties in the course of the running of the Company such as using a web builder or using a mailing service or passing on special dietary requirements. Where this is necessary the third parties will be required to treat the data in accordance with relevant legislation and be subject to Non-disclosure provisions. They will be required to treat the data securely and only for the purpose specified by the Company.

WCL is the data controller and the person responsible in WCL for the use and security of the data is the Clerk. All personal data will be kept in the Clerk's Office in a secure fashion. The data will only be used for the purposes for which it was collected. The Clerk and person to which data issues may be addressed is [clerk@launderers.co.uk](mailto:clerk@launderers.co.uk)

### **Personal data – what is it?**

Personal data relates to a living individual who can be identified from data. Identification can be, by the information alone or in conjunction with any other information in the data controller's possession or likely to come into such possession. The processing of personal data is governed by the General Data Protection Regulation (the "GDPR") and any subsequent legislation.

### **3. Who are we?**

We are the Worshipful Company of Launderers (WCL). The Clerk of the Company is responsible for the use and security of your data. This means WCL and its Clerk decides how your personal data is processed and for what purposes.

### **4. How do we process your personal data and why ?**

WCL complies with its obligations under the "GDPR" by keeping personal data up to date; by storing and destroying it securely; by not collecting or retaining excessive amounts of data; by protecting personal data from loss, misuse, unauthorised access and disclosure and by ensuring that appropriate technical measures are in place to protect personal data.

We use your personal data for the following purposes: -

- To administer the WCL;
- To administer the WCL formal and social occasions (this may include photographic/digital image records);
- To maintain our own accounts and records (including the processing of any charitable gift aid applications);
- To promote WCL as an established organization in the City of London and promote events and sponsorship that the Court believe worthwhile from time to time including publishing your contact details in the Year Book which is available as an internal document;
- To maintain security of WCL.

### **5. What is the legal basis for processing your personal data?**

- Processing is necessary, using Legitimate Interest for carrying out obligations under financial, employment, social security or social protection law, or a collective agreement;
- Processing where contracts are the essential element;
- Processing of special category data such as health, religious beliefs, trade union membership etc are carried out by a not-for-profit body with a political, philosophical, religious or trade union aim provided: -
  - the processing relates only to members or former members (or those who have regular contact with it in connection with those purposes); and
  - there is no disclosure to a third party without consent.

### **6. Sharing your personal data**

Your personal data will be treated as strictly confidential and will only be shared with personnel and other organisations associated with WCL in order to provide Company facilities/events/services. We will only share your data with third parties for the running of the Company, subject to relevant legal provisions incumbent on all.

### **7. How long do we keep your personal data?**

We keep data in accordance with the ICO guidance. Normally it is kept for the period of time that you are a member of the Company. Applications for membership that are unsuccessful will be kept for 12 months in case of challenge. Contractors and Employees data will be reduced to a minimum on completion of the contract and only kept a record of employment/service for reference purposes. Financial records and associated personal data will be kept for the year of the transaction and 6 full tax years following.

## **8. Your rights and your personal data**

Unless subject to an exemption under the GDPR, you have the following rights with respect to your personal data: -

- The right to request a copy of your personal data which WCL holds about you;
- The right to request that the WCL corrects any personal data if it is found to be inaccurate or out of date;
- The right to request your personal data is erased where it is no longer necessary for WCL to retain;
- The right to withdraw your consent (if under the consent permission) to the processing at any time;
- The right to request that the data controller provide the data subject with his/her personal data and where possible, to transmit that data directly to another data controller, (known as the right to data portability), (where applicable) [*Only applies where the processing is based on consent or is necessary for the performance of a contract with the data subject and in either case the data controller processes the data by automated means*].
- The right, where there is a dispute in relation to the accuracy or processing of your personal data, to request a restriction is placed on further processing;
- The right to object to the processing of personal data, (where applicable) [*Only applies where processing is based on legitimate interests (or the performance of a task in the public interest/exercise of official authority); direct marketing and processing for the purposes of scientific/historical research and statistics*]
- The right to lodge a complaint with the Information Commissioners Office.

## **9. Further processing**

If WCL wish to use your personal data for a new purpose, not covered by this Data Protection Notice, then we will provide you with a new notice explaining this new use prior to commencing the processing and setting out the relevant purposes and processing conditions. Where and whenever necessary, we will seek your prior consent to the new processing.

## **10. Your part in Data protection**

It would be very useful if you could make a point of keeping the Company informed of any changes to the information we hold about you. This will be helpful to you and the Company for efficient administration but also it is essential for security as well as Health and Safety provisions.

## **11. Contact Details**

To exercise all relevant rights, queries of complaints please in the first instance contact the WCL Clerk: 020 7378 1430 [clerk@launders.co.uk](mailto:clerk@launders.co.uk)

You can contact the Information Commissioners Office on 0303 123 1113 or via email <https://ico.org.uk/global/contact-us/email/> or at the Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire. SK9 5AF.