

Wirksworth Twinning Association Privacy Policy

Organisation and Mission

As outlined in our Constitution (as revised and adopted at the AGM held 21 November 2008), Wirksworth Twinning Association (WTA) exists to promote and foster international friendships and understanding, including, but not exclusively through, twinning visits between residents in the area of and around Wirksworth in the UK, and those of other towns with which WTA may form links.

To achieve that mission, it needs to collect and use personal information about its member families, and those of the corresponding host families in our partner towns, and other contacts, eg artists, musicians.

WTA is committed to protecting and respecting your privacy. For any personal data you provide for the purposes of your membership or in connection with twinning visits (see below), WTA is the Data Controller and is responsible for processing that data in a fair, lawful, secure and transparent way.

Personal Data Collected by WTA

The personal data WTA collects at the time of registering membership are:

- names;
- postal addresses;
- email addresses; and
- telephone numbers.

Lawful Basis for processing personal data

The **GDPR (General Data Protection Regulation)** of May 2018 lays out a set of lawful bases as the only allowable justifications for organisations processing personal data. Of these bases, the WTA relies on *Legitimate Interest* in order to hold and process the minimal data we collect. Such data is necessary for us to function as a Twinning Association and it is used only in ways which our members would reasonably expect.

Reasons we need to process your data may include:

For membership and management

- processing of membership forms and payments;
- sharing data with committee members to provide information about WTA activities, membership renewals or invitation to social events;
- circulating newsletters promoting WTA activity.
- reporting to funders (eg. the Town Council).

Twinning visits

We need additional data for the purpose of facilitating arrangements for matching hosts and guests for visits to our partner towns. Therefore, if you wish to take part in these visits (either as guests or hosts) we may ask you to provide the following information:

- date of birth
- passport number
- details of relevant medical conditions (including allergies) or mobility impairments
- emergency contact details
- dietary requirements
- hobbies, interests.

This kind of data we hold about you is processed solely for the purposes of arranging visits to and from our partner towns. We process this data on the lawful basis of consent. Therefore, we will need your explicit consent to hold and process this data, which we will ask for at the point of collecting it.

This information is shared with our twinning partner groups and, through them, to the partner families partaking in the visit. In return, WTA and its families receive similar information about visiting partners.

This information will be stored for four weeks after the visit and then destroyed securely. We will ask our twinning partners to observe the same protocol for any personal data that they hold for the purposes of the visit.

Communication of non-WTA activities

From time to time, we may wish to share information regarding non-WTA activities, which we believe you may find interesting because they concern events of a related nature (eg. Foreign film showings not arranged by WTA). We will seek your explicit consent that you wish to be included in such communications.

Social media

The club has a Facebook page. WTA members and non-members are free to join this page. If you join this page or other social media pages that WTA may create, please note that provider of the social media platform(s) have their own privacy policies and that WTA does not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data on any WTA social media page.

Who we share your personal data with

WTA does not supply any personal data it holds to any third party, other than to the relevant committee members of our partners as mentioned above, or to transport or accommodation providers, for members taking part in one of our visits or hosting a guest.

Data Administration

The Secretary and Membership Secretary of the association are the primary data holders, and the Membership Secretary is the primary contact for questions about personal data held by WTA.

Personal data is typically held and processed in the form of password-protected spreadsheets on domestic personal computers owned by the Secretary and Membership Secretary, and subject to conventional domestic access controls.

Data Sharing

The personal data held by WTA is not shared outside the association, other than with our twinning partners and transport and accommodation providers where necessary, as described above.

It is fully available to the elected committee.

Data Retention

Personal Data collected will be held as long as the data subject remains a member of the association, and for up to a year afterwards, with such records being deleted from active lists by the next membership renewal cycle.

Backup copies may exist longer as part of regular system backups, but will not be processed.

Further processing

If we 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.

Your rights regarding your personal data

Under **GDPR**, as *data subjects*, WTA members have the right at any time to request access to, rectification or erasure of their personal data; to restrict or object to certain kinds of processing of their personal data, including direct marketing; to the portability of their personal data and to complain to the UK's data protection supervisory authority, the Information Commissioner's Office about the processing of their personal data.

If you wish to exercise any of these rights you should initially contact the Secretary of the association (secretary@wirksworthtwinning.org.uk) who will instigate the appropriate process with the assistance of the Membership Secretary.

As a data subject, you are not obliged to share your personal data with WTA. However, if you choose not to share your personal data with us we will not be able to register or administer your membership.

Judie Taylor and Nic Pollock
Co-Chairs, WTA
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