



The Worshipful Company of Founders

Founders' Hall, Number One, Cloth Fair, London EC1A 7JQ

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www.foundersco.org.uk

Email: office@foundersco.org.uk

PRIVACY NOTICE

OVERVIEW

Our Intent

We are committed to safeguarding the privacy of our members. The Company will only use the information that we collect about you lawfully and in accordance with the Data Protection Act 1998 and the General Data Protection Regulation and the new British Data Protection Bill which are currently passing through Parliament.

This Privacy Notice is therefore intended to comply with the Act and GDPR but may change over time.

Member's Terms & Conditions

This Privacy Notice, forms part of the Terms & Conditions for being a member of the Company. In legal terms, members are "Data Subjects," i.e. the individual, however, we may also, under these terms, collect personal information regarding your spouse, partner and dependents, if appropriate (e.g. for the Freedom by Patrimony).

The Data Controller

The Worshipful Company of Founders (to be known as The Company) is, from a legal perspective, classed as the 'Data Controller'

Data Protection Officer (DPO)

The Company is not required to appoint a DPO by virtue of the fact that data processing is neither a core activity, large scale or regular and systematic. The Clerk is to be the primary and independent point of contact for data protection matters. The formal mechanism for members to raise concerns regarding the processing of personal data is primarily to email: office@foundersco.org.uk , or to write to The Clerk, The Worshipful Company of Founders, Founders' Hall, Number One, Cloth Fair, London EC1A 7JQ. Verbal enquiries from guests will be treated appropriately by Company staff members, although a written follow up may be requested if appropriate.

Purpose of Processing Personal Data

The Company collects personal data primarily to support and advance the activities of the Company, and to raise funds for its chosen charitable works.

Lawful Basis of Processing Personal Data

The lawful basis of processing your personal data are as follows:

Consent

Once you have agreed to this Privacy Notice of our Terms & Conditions you will be registered for the processing of your personal data based upon your Consent.

Categories of Personal Data Processed

The information we hold should be accurate and up to date. The personal information which we hold will be held securely in accordance with our internal data protection and security policies.

The type or categories of personal data we will collect about you includes such elements as:

- Name
- Postal address
- Email address
- Mobile and landline numbers
- Date of birth
- Profession, interests and education
- Financial details
- Other information

If you are invited to serve on Company committees or to join the Livery or advance to the Court, we may request further information and retain additional records, such as interview notes. It follows that minutes of meetings and records of decisions may include your name and other information about you.

Category of Recipients of Personal Data

Your name and contact details will primarily only be used internally within the Company. However, if you participate in a dinner or other Company activity, we may provide your name and possibly other details to other stakeholders. (E.g. our caterers will need to know if you have any dietary requirements).

Transfer of Personal Data Outside the EEA (European Economic Area)

Personal data will only be transferred outside the EEA or other areas of adequacy determined by the EU, for specific events. If this is required, consent will be explicitly requested from you.

Sensitive Personal Data

We will never collect sensitive personal data about you without your explicit consent and a clear explanation why it is required.

Spouse/Partner and Children Personal Data

If we hold separate personal data about a member's spouse or partner we will ask for consent from the spouse or partner for this. For member's children, under the age of 18 years old, we will assume parental consent, however they may withdraw consent upon reaching the age of 18.

Sale or Passing of Personal Data to Third Parties

We will not sell or pass your personal data to any commercial or charitable organisation excepting in the case of your making personal contact with that organisation on the Company's behalf. In cases such as this you will be asked for your explicit consent.

Retention of Personal Data

We will retain your personal data as follows:

Information Held Under Consent

Whilst you are a member of the Company. Should you leave for any reason, we will request your consent in continuing to hold your name and relevant details to support our historical records.

Data Subject's Rights

Under the Act and even more so under GDPR individuals have a number of Rights:

Right of Access

You are entitled to access your personal data so that you are aware of and can verify the lawfulness of the processing. This is achieved through the mechanism of a Subject Access Request (SAR) and you have the right to obtain:

- Confirmation that your data is being processed (held)
- Access to your personal data (a copy)
- Other supplementary information that corresponds to the information in this privacy notice.

Fees and Timings

Under GDPR and from 25 May 2018, this information will be provided without charge, without delay and within one month. If an extension is required or requests are considered manifestly unfounded or excessive, in particular because they are repetitive, the Company may choose to charge a reasonable fee, taking into account the administrative costs of providing the information, or refuse to respond. The reasons for this will be formally notified to you and your rights to appeal to the appropriate Supervisory Authority, i.e. UK Information Commissioner's Office (ICO) will be highlighted.

Identity Verification

To protect your personal data The Company will seek to verify your identity before releasing any information, which will normally be in electronic format. As a member this will normally be a simple process, however if the SAR is made from a member living overseas, or former member, or by the relative of a deceased member, then additional verification steps are likely.

Right of Rectification

You are entitled to have personal data rectified if it is inaccurate or incomplete. The Company will respond within one month of your request. In the unlikely event The Company does not take action to the request for rectification, we will inform you of the reason, your rights to complain or seek judicial remedy.

Right of Erasure

You may request the deletion or removal of personal data where there is no compelling reason for its continued processing or holding. The Right to Erasure does not provide an absolute *'right to be forgotten'*. However, you do have a right to have personal data erased and to prevent processing in specific circumstances:

- Where the personal data is no longer necessary in relation to the purpose for which it was originally collected/processed
- Where you withdraw consent
- When you object to the processing and there is no overriding legitimate interest for continuing the processing
- The personal data was unlawfully processed
- The personal data has to be erased in order to comply with a legal obligation

Right to Restrict Processing

Under the Act you have a right to 'block' or suppress processing of personal data. The restriction of processing under the GDPR is similar. When processing is restricted The Company is permitted to store the personal data but not further process it. In this event exactly what is held and why will be explained to you.

Right to Data Portability

You may request to obtain and reuse your personal data for your own purposes across different services. This allows you to move, copy or transfer personal data easily from one IT environment to another in a safe and secure way without hindrance to usability. The Right to Data Portability only applies:

- To personal data you have provided to the Company.
- Where the processing is based on your consent or for the performance of a contract.
- When processing is carried out by automated means.

In these circumstances The Company will provide a copy of your data in CSV or PDF format free of charge, without undue delay and within one month. If there is a delay to this you will be informed.

Right to Object

You have the right to object to:

- Direct marketing (including profiling).
- Processing for purposes of scientific/historical research and statistics.
- Processing based on legitimate interests or the performance of a task in the public interest/exercise of official authority (including profiling).

However, you should know that the Company only participates in the last of these categories, to a very limited degree and only in respect to members now deceased. (E.g. confirming that a person was a Liveryman in the 19th Century, in response to someone carrying out genealogical research).