

Data Protection

Privacy Notice

1. Introduction

Elms4London are committed to data protection under the UK-GDPR. This policy sets out our understanding of and compliance to the UK-GDPR.

Where Elms4London process personal data, this is done in compliance with the UK-GDPR principles on processing of personal data. That means it is:

- processed lawfully, fairly and in a transparent manner in relation to the data subject.
- collected for specified, explicit and legitimate purposes
- adequate, relevant and limited to what is necessary
- accurate and, where necessary, kept up to date
- kept in a form which permits identification of data subjects for no longer than is necessary
- processed in a manner that ensures appropriate security of the personal data
- Right to access requests and right to be forgotten are complied with

.....

Privacy Notice

1. Introduction

On 31st January 2020 new legislation on Data Protection entered into force - UK-GDPR. UK-GDPR replaces previous EU GDPR legislation however it is almost identical in content.

UK-GDPR allows the Group ("Controller" in GDPR-speak) to introduce operational rules and policies compliant with the Directive.

UK-GDPR provides legislation and guidance on the way the relationship between the Group and its Members works in relation to the information (data) which the Group collects from you and then processes and stores. Some data is necessarily provided to or accessed by a third party such as an event venue or a caterer. Most of the law is mandatory but where there are options this notice will identify and explain the option the Group is using. Many of the terms are rather technical but we need to use

specific terms in order to say exactly what UK-GDPR stipulates. The Group's first task is to be a lawful processor of your data.

2. Lawful Processing

Agreement of participating in the ELMs4London programme is a form of contract where Members agree to participate in the London Elms Project. The Group asserts that it is a lawful processor by virtue of this relationship and does not need to obtain specific consent to process data. The Group also considers it is exempted from any obligation to appoint a Data Protection Officer (DPO) but it does accept the obligation to carry out processing in ways which are lawful, fair and transparent. The Group may be required to appoint a designated DPO by the UK legislation.

3. Types of Data Collected and Stored

The Group is committed to recording accurate personal data which primarily consists of your name, email address and relevant questions used to enable Elms4London to undertake your application/sponsorship.

The Group does not collect sensitive personal data such as genetic, biometric or health data. Nor does it collect information on race, ethnicity, religion, political persuasion, or sexual orientation. Such sensitive data is known in GDPR as special category data.

The Group may use the data collected as part of the greater project planning undertaken by Elms4London and the group keeps a central store of Members' personal data in its database.

In the event of there being a data breach the Group undertakes to inform you (as well as any relevant authority) not later than 1 month of the Group becoming aware of the breach. The Group does not believe that the data it holds give rise to any need to report a breach to the Information Commissioner within 72 hours but it is conscious of the possible need to do so. Paper records are also held securely.

4. Transfer and Sharing of Data

ELMs4London is the controller and principal processor of your data. The Group's Officers may also wish to look at Member data from time to time.

The Group will not be able to release to a member personal data about another member, even a telephone number or email address, without your permission.

The Group does not knowingly transfer your data outside the EU and requires all its suppliers not to make such transfers. The ultimate location of computer servers can make this apparently simple commitment difficult to enforce.

5. Retention of Data

The data will be maintained in the database for the length of the ELMS4London programme.

6. Your Rights

- To complain

Ideally the Group would wish to try to deal with complaints itself before recourse to any external authority and asks Members to submit complaints via email or post, but it is open to Members to submit a complaint at any time to the Office of the Information Commissioner.

- To have correct data recorded by the Group

The Group will be happy to correct errors and to update its records when circumstances change.

- To require the Group to erase data which it holds about a Member

The Group will fully respect the new legislation but reminds Members that the low-level information gathered by the Group is perceived by the Group as the minimum needed to provide Members with the benefits of Group Membership.

7. The Group Website

This policy applies when members use the Group website. The Policy Notice is published on the website.

8. Updates

Whenever this policy is updated a notice will be posted in the website.

Date: 09 October 2021