

# International Caravanning Fellowship of Rotarians (ICFR) - Privacy Policy

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## 1. Scope of the Policy

This policy applies to the work of the International Caravanning Fellowship of Rotarians (ICFR). ICFR must gather personal data for personal membership purposes. This policy details how such data will be gathered, stored and managed in line with data protection principles and the General Data Protection Regulation (EU) 2016/679. (GDPR). The policy will be reviewed on an ongoing basis by the ICFR Executive Committee members to ensure compliance. This policy should be read in tandem with the Privacy Notice below.

## 2. Principles of the Data Protection of personal data as defined in the GDPR

- a) processed lawfully, fairly and in a transparent manner in relation to individuals;
- b) collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes; further processing for archiving purposes for historical research or statistical purposes shall not be incompatible with the initial purposes;
- c) adequate, relevant and limited to what is necessary for the purposes for which it is processed;
- d) accurate and kept up to date; every reasonable step must be taken to ensure that personal data that is inaccurate is erased or rectified without delay;
- e) kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed; personal data may be stored for longer periods insofar as the personal data will be processed solely for archiving purposes for historical research purposes or statistical purposes subject to implementation of the appropriate technical and organisational measures required to safeguard the rights and freedoms of the individuals;
- f) processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures.

ICFR must be responsible for, and be able to demonstrate, compliance with these principles.

## 3. This Policy Exists to ensure that ICFR

- Complies with data protection law and follows good practice
- Protects the rights of members
- Is open about how it stores and processes members' data
- Protects itself from the risks of a data breach

## 4. Lawful, fair and transparent data processing

ICFR requests personal information from potential members and members for sending communications about their involvement with ICFR, and for the preparation of an ICFR Membership Handbook sent to all members in printed format. The forms used to request personal information will contain a privacy notice informing potential members and members as to why the information is being requested and for what the information will be used. The Executive Committee of ICFR will seek to ensure that member information is not used inappropriately.

Appropriate use of information provided by members will include:

- Communicating with members about ICFR events and activities.
- Preparing a Handbook of ICFR Members' information, to be sent to all members, for such individual communications. This Handbook will carry very clear notice regarding its "Confidential" nature and its use by Members "only for legitimate ICFR purposes".
- Sending members issues of the ICFR News and Views magazine and the Members Handbook.
- Communicating with members about their membership and/or renewal of their membership.
- Communicating with members about specific issues associated with their membership.

In addition, the ICFR organisers of individual Rally Events (The Rally Marshals) will need to collate similar personal data from those wishing to attend such Rallies; and Secretaries of local ICFR Area groups will need to collate mailing information for the members within their respective ICFR Areas for the calling and arranging of local meetings and social events.

Such personal data – whether stored centrally, by an ICFR Officer, or by local Rally Marshal/Area Secretary - should be stored in a secure manner as outlined below in para 7 and should be destroyed once no longer required for the Rally, or the local Area Secretary passing on such post to a different member of ICFR.

Members of ICFR will only be asked to provide information that is relevant for membership and rally organisation purposes, such as:

- Name.
- Postal address.
- Email address.
- Telephone number(s).
- Details of Rotary Club Membership and/or family links with current ICFR members and/or Rotary Alumni links as are relevant to meet our Membership criteria.
- Bank account details to setup Standing Order payment of Membership Subscriptions.
- Dates of intended attendance at Rallies.
- Details of the caravan or motorhome which the member will be using.
- Names of non-member guests – with the approval of the guest.
- Membership details of Caravan and Motorhome Club and Camping and Caravan Club.
- Allergy or dietary information.
- Emergency contact details – with the approval of the contact.

## 5. Accuracy of Data and Keeping Data up to Date

ICFR has a responsibility to ensure members' information is kept up to date. Members will be asked annually to let ICFR know if any of their personal information changes to facilitate this.

## 6. Accountability and Governance

The ICFR Executive Committee is responsible for ensuring that ICFR remains compliant with data protection requirements and can evidence that it has. The ICFR Executive Committee shall ensure that new members joining the Committee are fully aware of ICFR's Privacy Policy and understand how data protection is managed within ICFR and the reasons for this. The Committee will review data protection, what data is held centrally, and who has access to information.

## 7. Secure Storage and Processing

The ICFR Executive Committee members have a responsibility to ensure that data is both securely held and processed. In consideration of the risk of harm to individuals caused by unauthorised or unlawful processing or by accidental loss of data as being insignificant; the following will apply:

- Only granting access of electronic personal data of members to those on the Committee, or Area Committee, or Rally Marshals who need to communicate with members.
- Keeping secure those electronic devices that contain or access personal information – e.g. password protection on such devices or such data files is preferred.
- Using password protection or secure cloud systems when sharing data between Committee members.

## 8. Data Processing by a Third Party

The printer (and if so used, the distributor) of the ICFR News and Views magazine and the Membership Handbook is a third-party Data Processor. ICFR will have a written contractual relationship with such third-party with terms that satisfy GDPR requirements for employing a Data Processor. This will include stipulation that these third parties will securely destroy any such data once their printing and/or distribution task has been completed.

## 9. Privacy Notice.

To be included immediately prior to the signature box on personal member application forms:

*The International Caravanning Fellowship of Rotarians (ICFR) can be contacted by post addressed to the Membership Secretary or the Secretary, whose addresses are shown on the ICFR website (icfrotarianscaravanning.com). ICFR has a legitimate interest in using the personal data you give to ICFR on this form for communicating with you on matters relating to ICFR; to enable the ICFR News and Views magazine and Membership Handbook to be posted to your home address; and to set up the banking Standing Order for the payment of your subscription. This banking information will not be stored electronically and will be destroyed once your initial subscription has been received and audited. Your personal detail data will not be transferred to any other person or organisation and will be deleted from ICFR records one year after your membership of ICFR has terminated apart from your Name held for historical research or statistical purposes. You have the right to request from ICFR the rectification of your personal data. If you feel that your personal data has been misused, you have the right to complain to the Information Commissioners Office.*