

Speak Easy At Martlesham

PRIVACY NOTICE FOR OUR MEMBERS and OTHERS

We are committed to respecting your privacy.

This notice is to explain how we may use personal information (data) we collect:

1. **before, during and after your membership** – this applies to you if you have applied to become, are/were a member of Speak Easy At Martlesham (and thereby Toastmasters International);
2. **for any other relationship with us**, for instance where you have attended one of our meetings as a guest and have shared your contact details with us.

This notice explains how we comply with the (UK) law on data protection and what your rights are.

For data protection purposes we are the **data controller** of any of your personal information (data).

References to **the Club, we, our** or **us** in this Privacy Notice are to **Speak Easy At Martlesham**, a chartered club within the Toastmasters International organisation. Speak Easy At Martlesham is an unincorporated not-for-profit members club, and administered by an elected Committee according to Toastmasters International rules and principles. The club exists to promote personal development in public speaking and associated communication and leadership skills for members and invited guests.

We have not appointed a Data Protection Officer to oversee our compliance with data protection laws as we are not required to do so, but our **elected Secretary** has overall responsibility for data protection compliance in our organisation. Contact details are set out in the “Contacting us” section at the end of this privacy notice.

PERSONAL INFORMATION (DATA) WE MAY COLLECT FROM YOU

Depending on the type of membership, offers or services you register for with us, you may provide us with or we may obtain **personal information (data)** about you, such as information regarding your:

- personal contact details to allow us to contact you directly - such as name, title, email addresses and telephone numbers;
- confirmation that you are over 18 years old;
- membership start and end date(s);
- records of your contacts with us - such as telephone conversations, emails and other correspondence and your instructions to us;
- use of our website(s), including passwords, personal identification numbers, IP (network) addresses, user names and other identifying information;
- records of your Club meetings attendance or at other events managed by or hosted by us;
- video, photographic or audio recordings of meeting or event activities involving you;
- your marketing preferences, so that we know whether and how we should contact you.

WHERE WE COLLECT YOUR INFORMATION

We typically collect personal information (data) about our members when you apply to become a member of Speak Easy At Martlesham. We may also collect personal information (data) when you:

- contact us by phone, email or in some other way;
- attend one of our meetings or events as a guest.

THE USES WE MAKE OF YOUR INFORMATION

The table below summarises the main purposes for which we hold and process your personal information (data), the categories of your information involved and our **lawful basis** for doing this.

Where the word ‘needed’ is used in the Lawful Basis column, this means we are holding your data on a ‘legitimate interest’ basis. i.e. it’s needed to administer your membership.

Where the words ‘explicit consent’ are used, this covers using your data for marketing or promotional purposes, where we need your (optional) explicit consent – these uses are shown in *italics*.

PURPOSE	Personal Information (data) USED	LAWFUL BASIS (for holding data))
To administer your Club membership, including dealing with payments and with any other membership related enquiries made by you.	All contact and membership details, transaction and payment information, records of your contacts with us and marketing preferences.	Needed for us to properly manage and administer your membership with us.
<i>To send you ‘marketing information’ we think you might find useful, including newsletters, information about membership and events.</i>	<i>Contact details and marketing preferences.</i>	<i>With your explicit consent to do so ONLY.</i>
To answer your queries or complaints	Contact details and records of your contacts with us.	Needed for complaint handling, in case there are any issues with your membership.
Retaining records	All the personal information (data) we collect.	We need to retain records to properly administer and manage your membership and run our club. In some cases we may need to retain records for legal or regulatory reasons.
The security of our IT systems	Your use of our IT systems and online portals/websites.	Needed to ensure that our IT systems are secure and that you are using them appropriately.
<i>For the purposes of promoting the Club, our events and membership benefits; including for training and personal record processes.</i>	<i>Video recordings and/or photographic images and/or sound recordings</i>	<i>Where you have given us your explicit consent to do so ONLY. You may also limit access to these images/recordings.</i>
To comply with health and safety requirements	Records of attendance, where required ONLY	Needed to meet our obligations to provide you and other Club members with a safe environment for Club activities.
To administer your attendance at any external events you sign up to	All contact and membership details, transaction and payment data.	Needed for us to register you and properly manage and administer your attendance at an event or onto a course or programme.

For some of your personal information (data) you will have a legal, contractual or other obligation for you to provide us with your personal information (data).

- If you do not provide us with the requested personal information (data) we may not be able to admit you as a member.
- If you are already a member, we may not be able to properly administer your membership or comply with obligations and we may have to terminate your membership.

Where you have given us your consent to use your personal information (data) in a particular way, you have the right to withdraw this consent at any time, which you may do by contacting us as described in the “**Contacting us**” section below.

- Please note however that if you withdraw your consent it will not affect any use of the data made before you withdrew your consent. We may still be entitled to hold and process the relevant personal information (data) to the extent that we are entitled to, other than by your consent. Withdrawing consent may also have the same effects as not providing the information in the first place, for example we may no longer be able to properly administer your membership or comply with obligations and we may have to terminate your membership.

MARKETING INFORMATION

From time to time, we may contact you by email, post or text or other messaging with information about Club or other events, products and services we believe you may be interested in.

We will not share your personal data with third-party businesses or organisations for their marketing.

We will only send marketing messages to you according to the marketing preferences you set. You can then let us know at any time that you do not wish to receive marketing messages by contacting us using the details in the “**Contacting us**” section below.

DISCLOSURE OF YOUR PERSONAL INFORMATION (DATA)

We may share personal information (data) with the following parties:

- **Any person or organisation (explicitly) approved by you;**
- **Toastmasters International;** our umbrella organisation;
- **Other service providers:** including contractors, suppliers and IT services providers (including CRM, website, video and teleconference services);
- **The Government or regulators:** where we are required to do so by law or to assist with their investigations or initiatives;
- **Police, law enforcement and security services:** to assist with the investigation and prevention of crime and the protection of national security.

TRANSFERRING YOUR PERSONAL INFORMATION (DATA) INTERNATIONALLY

The personal information (data) we collect may be transferred to and stored in countries outside of the UK and the European Union.

Your core membership details will be stored on Toastmaster International systems located in and administered from the United States of America.

Some countries have different levels of protection for personal information (data). In some cases the laws in those countries may be less protective than in the UK. We will take all reasonable steps to ensure that your personal information (data) is only used in accordance with this privacy notice and applicable data protection laws and is respected and kept secure. Where a third party processes your data on our behalf we will put in place appropriate safeguards as required under data protection laws. For further details please contact us by using the details in the “**Contacting us**” section below.

HOW LONG DO WE KEEP PERSONAL INFORMATION (DATA) FOR?

The length of time for which we retain your personal information (data) will differ depending on the type of information and the reason we collected it from you. In some cases we may retain personal information (data) for a long term. Generally, where there is no other legal requirement we will retain all physical and electronic records for a period of **six years** after your last contact with us or the end of your membership. Exceptions to this rule are:

- Details regarding unsuccessful or uncompleted membership applicants where we hold records for a period of not more than **12 months**;
- Information that may be relevant to personal injury or discrimination claims may be retained until the limitation period for those types of claims has expired. For personal injury or discrimination claims this can be an extended period as the limitation period might not start to run until a long time after the event.

YOUR RESPONSIBILITIES

It is important to make sure that the personal information (data) we hold about you is accurate and up-to-date. You should let us know if anything changes; for example if you change your phone number or email address. You can contact us by using the details in the “**Contacting us**” section below.

YOUR RIGHTS IN RELATION TO YOUR PERSONAL INFORMATION (DATA)

You have the following rights relating to your personal information (data):

- to be informed about how your personal information (data) is being used;
- to access the personal information (data) we hold about you;
- to request the correction of inaccurate personal information (data) we hold about you;
- to request erasure of your personal information (data) in certain limited circumstances;
- to restrict processing of your personal information (data) where certain requirements are met;
- to object to the processing of your personal information (data);
- to request that we transfer elements of your data either to you or another service provider;
- to object to certain automated decision-making processes using your personal information (data).

Your right to withdraw consent or object to processing for marketing and promotion are absolute rights.

This privacy notice sets out a general summary of your legal rights regarding your personal information (data). This is a very complex area of law though. More information about your legal rights can be found on the Information Commissioner's website at <https://ico.org.uk/for-the-public/>.

To exercise any of the above rights, or if you have any questions relating to your rights, please contact us by using the details in the "**Contacting us**" section below.

If you are unhappy with the way we are using your personal information (data), please contact us in the first instance to give us the opportunity to resolve any issues.

You can complain to the UK Information Commissioner's Office, if you do not believe we have dealt with your concerns satisfactorily.

CHANGES TO THIS NOTICE

We may update this privacy notice from time to time. When we change this notice significantly, we will update the version date at the bottom of this page and give you reasonable notice unless we are prevented from doing so. Where required by law we will seek your consent to changes in the way we use your personal information (data).

CONTACTING US

In the event of any query or complaint in connection with the information we hold about you, please contact us via our website Contact Us page or directly to the elected club Secretary– contact details available on request.

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