

OLD MILLHILLIANS CLUB LIMITED - PRIVACY STATEMENT

What is this document?	<p>The Old Millhillians Club Limited ("The Club") is committed to safeguarding your privacy. We want you to know how we collect, use, share, and keep information about you.</p> <p>In this privacy statement, we describe how The Club, in its capacity as the data controller, collects, uses, shares, and keeps information about you in accordance with Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 (the General Data Protection Regulation or GDPR), The Data Protection Act 2018 and related legislation. (Data Protection legislation).</p> <p>From time to time, we may change this privacy statement. Depending on the nature of the change, we will inform you of any such change through our written communications with you or through our website omclub.co.uk.</p>
Lawful bases for data processing	<p>Under GDPR there are six lawful bases for processing data. The Club considers "Contract" to be the most appropriate for its members. Members choose to join the Club and to comply with its Rules at all times. The Club Rules are amended only if members approve changes at the Club's AGM. The Club receives membership subscription fees and incurs obligations to its members which are effectively contractual. The Club uses "Legitimate Interest" as its lawful basis for communicating with Old Millhillians who are not members of the Club. The Club also secures the consent of school leavers to process their data and receive communications after they have left the school and are considered to be adults.</p>
Personal Data Collected	<p>At Attachment 1, we list the Personal Data we collect from you, why it is important and how we store it.</p>
Use of Personal Data	<p>At Attachment 2 we explain how we use your Personal Data and provide specific examples of our communications and the typical frequency of any particular communication.</p>
Sharing of Personal Data	<p>The Club is party to a Data Sharing Agreement with the Mill Hill School Foundation (The Foundation). We do not share your Personal Data with anyone or any organisation except as described below:</p> <ul style="list-style-type: none"> <input type="checkbox"/> The Foundation <input type="checkbox"/> The Life Guardians, who are empowered by Article 13 of the Memorandum and Articles of Association of The Foundation <input type="checkbox"/> Subject only to obtaining your prior written consent, to provide your contact details only to an Old Millhillian in response to their written request to make contact with you <p>Your personal data held by The Club is protected and stored centrally either on The Club's database which is on the Foundation's computer system (currently operated by Toucan Tech) and is only accessible by authorised users or on its own secure systems (currently operated by Xero). The Club will notify you if its database is transferred to another system.</p>
Information Disclosure	<p>We may disclose your Personal Information to a third party if we have a legal obligation to do so and we have not voluntarily assumed that obligation. We will not transfer your Personal Information other than in the event of a transfer of a substantial part of the Club's assets to a successor entity to the Club.</p>
International Transfer of Data	<p>We process and access your Personal Data through our systems in the UK or EEA. Your personal data will not be transferred outside the EEA unless you have consented to us transferring your data to an Old Millhillian resident overseas.</p> <p>Regardless of where we process your information, we will take appropriate steps to ensure the adequate level of protection for your information in other countries outside the UK or EEA including the USA, where data protection laws may not be as comprehensive as the UK or EEA.</p>
Security	<p>We will take appropriate technical and organisational steps to ensure the security of your Personal Data. We shall require the Foundation to do the same whilst our database is stored on its system and only use your Personal Data for the purposes we specify.</p>

Retention of Personal Data	<p>We will keep your Personal Data only as long as we need to fulfil our obligations to you as a member, unless we are required to keep it for longer periods by law. Should you cease to be a member, for whatever reason, we will take reasonable steps to seek your consent to retain your Personal Data for 3 years from the date that your membership ceased, in case you decide to re-join the Club. Within a reasonable time from your ceasing to be a member or after the expiry of the said 3 year period or such longer period required by law, we will take reasonable steps to securely delete all Personal Data relating to your membership from the Club's records.</p> <p>In the event that a member dies, we shall retain that member's Personal Data if requested to do so by their next of kin to enable the latter to be kept in touch with Member news for so long as they wish to do so.</p> <p>If you have any specific queries about how our retention of data policy is applied, or wish to request that personal data that you no longer believe to be relevant is considered for erasure, please contact Peter Wakeham in writing at the address mentioned below. However, please bear in mind that the Club will often have lawful and necessary reasons to hold on to some personal data even following such request.</p> <p>A limited and reasonable amount of information will be kept for archiving purposes, for example; and even where you have requested we no longer keep in touch with you, we will need to keep a record in order to fulfil your wishes.</p>
Accuracy of Personal Data	<p>We will endeavour to ensure that all Personal Data held in relation to an individual is as up to date and accurate as possible. We encourage you to check regularly that all Personal Data held by us is accurate and up to date. If you believe that any information we hold about you is incorrect or incomplete, you may ask us to correct or remove this information from our records. We recommend that you contact the Club Office in writing to advise of any amendments required. Any information which is found to be incorrect or incomplete will be corrected promptly.</p>
Your Rights	<p>You have various rights under Data Protection legislation to access and understand the Personal Data about you held by The Club, and in some cases to ask for it to be erased or amended or have it transferred to others, or for The Club to stop processing it – but subject to certain exemptions and limitations.</p> <p>Any individual wishing to access or amend their personal data, or wishing it to be transferred to another person or organisation, or who has some other objection to how their personal data is used, should put their request in writing to the Club's Data Protection Officer, Peter Wakeham, Chair, Old Millhillians Club Limited, The Ridgeway, London, NW7 1QS or by email to chair@omclub.co.uk</p> <p>We will endeavour to respond to any such written requests as soon as is reasonably practicable and in any event within statutory time-limits (which is one month in the case of requests for access to information). We will be better able to respond quickly to smaller, targeted requests for information. If the request for information is manifestly excessive or similar to previous requests, we may ask you to reconsider, or require a proportionate fee (but only where Data Protection legislation allows it).</p>
Query or Complaint	<p>If you have questions about this privacy statement or how your information is handled or wish to make a complaint or exercise your rights, please write to our Data Protection Officer: Peter Wakeham, Chair, Old Millhillians Club Limited, The Ridgeway, London, NW7 1QS or email to chair@omclub.co.uk.</p> <p>You can also make a referral to or lodge a complaint with the Information Commissioner's Office (ICO), although the ICO recommends that steps are taken to resolve the matter with the Club before involving the regulator.</p>

Attachment 1

MEMBER PERSONAL INFORMATION COLLECTED BY OLD MILLHILLIANS CLUB LIMITED

DATA GROUP	COLLECTION METHOD	EXAMPLES	PURPOSE	DATA STORAGE
Contact details	Membership Application Form	Name, address, telephone and e mail	To communicate with members, in accordance with Club obligations described in the Membership Application Form	Central Database shared with Mill Hill School Foundation and Life Guardians
Personal details	Membership Application Form	Gender, Date of birth, House, Years at School, Nationality	To facilitate more customized communications where appropriate	Central Database shared with Mill Hill School Foundation and Life Guardians
Membership Category	Club Office designation Membership Application Form	Junior, Senior, Over 80/Life/Annual Date of birth	Subscription fee payments audit trail Category changes : Junior to Senior; Senior to Over 80; Annual to Life member	Xero Accounting system and Central Database shared with Mill Hill School Foundation Central Database shared with Mill Hill School Foundation and Life Guardians
Annual Subscription Fee details	<u>Relevant Forms</u> Bankers Order, Direct Debit	Bank account or Debit/Credit Card details	Collect subscription fees on due date	Xero Accounting System
Life Membership Subscription Fee details	<u>Relevant Forms</u> Bankers Order ,Direct Debit	Bank account or Debit/Credit Card details	Collect subscription fees on due date	Xero Accounting System
Event attendance	Attendance lists and payment records	Annual Dinner Networking and Social Events	To facilitate more customized communications where appropriate	Central Database but data not shared with Mill Hill School Foundation and Life Guardians
Merchandise purchases	Order Form	Items purchased, date of purchase, price paid	To facilitate Financial Accounts audit trail	Central Database but data not shared with Mill Hill School Foundation and Life Guardians
Volunteer details	Responses to surveys	Career Support Governor Candidates	Career or Professional Networking Event attendance Input to Life Guardians' Governor recruitment process	Central Database shared with Mill Hill School Foundation Central Database shared with Mill Hill School Foundation and Life Guardians
Appeal respondents	Respondent lists	Annual Dinner Appeal by Presidents	Request to help subsidise costs of Guests and Juniors at Annual Dinner	Central Database but data not shared with Mill Hill School Foundation and Life Guardians

OLD MILLHILLIANS CLUB DATABASE USAGE PROTOCOL*

MEMBER COMMUNICATIONS	SPECIFIC EXAMPLES	TYPICAL FREQUENCY
Regular information and news communications	E Newsletter Martlet Magazine	Monthly Bi-annually
Irregular information and news communications	Obituaries Subscription policy and charges Club policies, plans, rules	Ad hoc, as required
Invitations to regular events Requests for payment for attending events	Annual Dinner AGM Cocktail Party YOMS Christmas Party Professional Networking Events Sports Club/Society events Regional reunions Overseas reunions Special Interest occasions – e.g. event for all OM students at particular university	Ad hoc
Promoting sale of Club merchandise	Item in stock notifications Order process and despatch	Ad hoc Ad hoc
Membership promotion	Invitations to switch from annual to life membership Posting list of members on members only password protected section of website Invitations to non members	Ad hoc Quarterly updates Annually
Requests for volunteers	Potential Governor candidates Career support initiatives	Every three years Every two years
Appeals for donations	President's Appeal Collinson Garden Ad hoc (e.g. departing Head portrait)	Annually Ad hoc Ad hoc
Responses to member requests	Forwarding member contact details, subject to written permission	Ad hoc

* Subject to regular updates at ICO