

PRIVACY NOTICE

22 May 2018

The new General Data Protection Regulation (GDPR) comes into force on 25 May 2018. The regulation addresses data protection and privacy for all individuals within the EU:

- It gives citizens and residents enhanced controls over their personal data.
- There are new requirements upon organisations holding and processing person-related data.

The Society now must clearly explain what personal data it requires, and why, and it must obtain your explicit consent for this data gathering, storage and processing before these take place.

Individuals' rights

The regulation provides important rights for individuals in respect of their personal data:

- The right to object to data profiling and direct marketing.
- The right to be forgotten – you can tell us to delete data related to you.
- The right to obtain a copy of any personal data we may hold about you.
- The right to have inaccurate data corrected.
- The right to data portability.
- The right not to be subject to a decision based solely on automated processing.

Our legal basis for data gathering, storage and processing

There must be one or more of six possible legal basis upon which the Society gathers, stores and processes person-related data. Five of these apply here:

1. The individual has given clear consent for the Society to process their personal data for a specific purpose. This is the basis of most of the data processing that we do for Society members and other individuals with whom we come into contact; for example, in the administration of paid 'memberships' and 'friends of the Society' relationships.
2. The data processing is necessary for fulfilment of a contract between the Society and an individual, or because they have asked us to take specific steps before entering into a contract. This is the basis that covers data processing in order to give service to Members and Friends after they have paid the appropriate fee, for example.
3. While generally we will not disclose personal data without consent, some data processing may necessary for the Society to comply with the law , e.g. disclosing information to governmental agencies or entities, regulatory authorities, or other persons in compliance with applicable law, regulations, a court order or an official request.
4. Some data processing may be necessary to protect someone's life. On this basis (as well as (2) above), the Society must record the names and addresses of all persons on

Society-organised Mine Trips and other Events as a safety measure in case there is an accident or other incident during their time on-site.

5. One of the legitimate interests of the Society is to archive and conserve artefacts and information from mining and ore processing-related activities at Nenthead. Some historic person-related data is kept for its historical value to that end, for example.

Whatever the basis that applies, personal data that is judged to be no longer relevant to the purposes of the Society or its legal obligations is deleted, physically destroyed, or anonymised to be kept for possible future use or later review.

What data we gather and how it is used and secured

All electronic data records are held in one or more of:

- Society's or Officer's/Trustee's password protected PCs, laptops and back-up hard drives.
- Society or Officer/Trustee password protected email accounts.

All paper-based data records are in the Society's Office at Nenthead.

Personal data gathered for site owner insurance reasons

The Nenthead site owner is Cumbria County Council. Certain categories of persons using the Nenthead site in association with Society activities must be identified in order to satisfy the owner's public liability insurance requirements.

- This insurance is arranged and managed via the British Caving Association (BCA) for the Society and many other similar organisations. The BCA is therefore the Society's data processor in GDPR terms. The Society has satisfied itself that this data processor is also complying with the GDPR.

Members of the public merely visiting the Society for an Open Day and similar public events do not need to provide personal information to the Society for insurance purposes.

Society Members must have surface-only or surface + underground BCA insurance obtained either via the Society, another member organisation affiliated to the BCA or personally from BCA. Personal data related to these facts is held by the Society and the BCA.

Friends of the Society and members of the public visiting the Nenthead site that participate in Society Mine Trip events, or to participate in other routine Society activities, e.g. maintenance and conservation works, are considered to be Temporary Members of the Society by the insurers for up to four visits to the site - the presumption being that if further activities are to be enjoyed then the individual will join the Society as a Member. The Society compiles an annual summary of Temporary Memberships for the BCA:

- Names of Temporary Members
- Addresses of Temporary Members

- Dates they attended/ Events participated in.

Data retention policy

The use of individual data in the day to day operations of the Society includes creating and retaining paper and or electronic copies of completed information forms and items of correspondence. The Society will normally retain data for up to six years or longer if the data is historically significant, concerns minors who have been Temporary Members, or there is another reason to do so in line with the purposes of the Society.

Society's online services and website

All Society Members and Friends are eligible to join the Society's Facebook Group. This is a 'closed group', meaning that the permitted membership of the group and the postings traffic on it are under the administration of Society-appointed Moderators and Facebook's own policies in regard to GDPR compliance for its customers. Similar considerations apply to the Society's use of other online platform services e.g. from Google and Microsoft.

Online traffic at the Society's website (and the separate Facebook Group) is not monitored by the Society at the level of identifiable individuals. The Society has satisfied itself that its website service provider is GDPR compliant.

Requested deletion of data and refund of any subscription already paid

Any data subject can request the deletion of their personal data and the Society must comply with that request.

If the data subject is a Member or Friend of the Society then that relationship with the Society is naturally terminated as a consequence of deletion and there will be no refund of any subscription already paid.

Review and updating of this Privacy Notice and the Society's GDPR compliance status

The Trustees periodically review this Notice and the Society's overall GDPR compliance status. They may adjust the Notice and relevant policies and practices accordingly to maintain compliance (decisions and actions recorded in the Trustee Meeting minutes).

Data categories used by the Society

The following table summarises what personal Data Categories are in use and which categories each type of site visitor are asked for.

Data Categories marked with a * or # are shared with the British Caving Association for insurance purposes if a Friend or member of the public visits the Nenthead site in association with some kinds of Society event or activity – see above at Personal data gathered for site owner insurance reasons for more details.

Personal Data Category that may be collected by the Society	Type of Site Visitor		
	Member of NMCS	Friend of NMCS	Temporary Member of NMCS
Title	Yes	Yes [#]	Yes [*]
First Name(s)	Yes	Yes [#]	Yes [*]
Surname	Yes	Yes [#]	Yes [*]
Full Postal Address (Property Name, Street, Post Town/City, Postcode as applicable)	Yes	Yes [#]	Yes [*]
Event Attended and Event Date	Yes	Yes [#]	Yes [*]
Membership Type	Yes	Yes [#]	Yes [*]
Sex (optional for Temporary Members)	Yes	Yes	Yes
Year of Birth (not optional for minors who are Temporary Members – ‘minor’ is ‘under 18 years of age’)	Yes	Yes	Yes
Email address (optional for Temporary Members)	Yes	Yes	Yes
Home Telephone Number (optional for Temporary Members)	Yes	Yes	Yes
Mobile Telephone Number (optional for Temporary Members)	Yes	Yes	Yes
Preferred Salutation for communications from the Society (optional for Temporary Members)	Yes	Yes	Yes
Preferred Means of Communications and Consents given to the Society to use	Yes	Yes	Yes
Membership Fee Payment Date	Yes	Yes	
Membership Fee Value Paid	Yes	Yes	
Method of membership fee payment	Yes	Yes	
Gift Aid eligibility	Yes	Yes	
Donation paid with the Membership Fee on the Payment Date or otherwise	Yes	Yes	
BCA Insurance number provided by the applicant or obtained by the Society from the BCA after application	Yes	Yes	
BCA Group Name if BCA insurance has not been arranged via the Society	Yes	Yes	

Communication to Members and other contacts seeking consent to continue to use contact details provided in the past

(By email)

Nenthead Mines respecting your personal data privacy

The new personal data protection regulation comes into force on 25th May. We need your consent to continue to use your contact details (email, postal address, telephone number) after 25th May to send you messages, newsletters etc. that you receive from the Nenthead Mines Conservation Society.

If you do want communications from the Society using the contact details you have provided already, then please say so by simply replying to this email, **ideally before 25th May**.

If you do not want any further email communications from the Society, then you do not need to reply to this email. We will delete your email address from our database because we have not received your consent to keep it. Please note that if we have other kinds of contact details you have provided in the past, e.g. a postal address or telephone number, then we may continue try to contact you via these alternatives to confirm your wishes about means of further contact (or not) for Society membership renewals, for example.

The Society's new **Privacy Notice** on the Society's website www.nentheadmines.com explains our approach to compliance with the new regulation in some detail.

If you have any questions or concerns about our approach to your personal data privacy, then please do not hesitate to get in touch.