

Appendix 3

The Friends of Southwark Park – Privacy Notice

This Privacy Policy sets out in detail the purposes for which we process your personal data, what rights you have in relation to that data and everything else we think it's important for you to know. In this notice, references to 'we' or 'us' means The Friends of Southwark Park. This notice explains how we collect and use the personal information about you.

Owner and Data Controller

The Friends of Southwark Park

c/o Mayflower Hall (Old Assembly Hall), 1 Neptune St, London SE16 7JP

Email Contact:

fospsecretary@outlook.com

The General Data Protection Regulations came into effect in the UK on 25 May 2018, replacing the Data Protection Act 1998.

This Privacy Notice sets out most of your rights under the new laws. As the Regulations come into effect and the Information Commissioners Office (ICO) update their rules and best practice, we will continually update this Notice.

Updating This Statement

The Friends of Southwark Park may update this privacy policy by posting a new version on this website at any time. You should check this page occasionally to ensure you are familiar with any changes.

Who are we? The Friends of Southwark Park is an unincorporated "Friends of" group with charitable objects. We are a not-for-profit organisation. Our organisation is strictly non-party-political and recognised by the London Borough of Southwark. We are a membership organisation that holds meetings and events. Under our constitution a Committee is set up to manage the affairs of FoSP on behalf of members and our Committee members are elected at the AGM. The committee members are our trustees.

Keeping your data safe : Friends of Southwark Park are committed to keeping your personal data safe and secure, and handling it in accordance with the law. We will take reasonable technical and organisational precautions to prevent the loss, misuse or alteration of your personal information. We will take reasonable technical and organisational precautions to store, process and transport all personal information you provide in a secure manner.

Friends of Southwark Park operate the following social media:

- 1 www.southwarkpark.org (the "Website");
- 2 Facebook group and page "Friends of Southwark Park"
<https://www.facebook.com/groups/1645990082308999/>
- 3 Instagram account "southwarkparkfriends";
- 4 Twitter account "@southwark1869".

We are also seeking to clarify the ownership and control of:

Twitter account “@Southwark_Park” and;
<http://www.friendsofsouthwarkpark.co.uk/>

At this time Friends of Southwark Park have no control over Twitter account “@Southwark_Park” or <http://www.friendsofsouthwarkpark.co.uk/>. Any enquiries about “@Southwark_Park” or <http://www.friendsofsouthwarkpark.co.uk/> should be made directly to those resources. Both account “@Southwark_Park” and <http://www.friendsofsouthwarkpark.co.uk/> were setup by / for Friends of Southwark Park however are now controlled by former Committee members.

We may take action against anyone passing off or impersonating Friends of Southwark Park. We may not approve membership applications or terminate membership of anyone involved in passing off or impersonating Friends of Southwark Park (see Code of Conduct).

The Friends of Southwark Park is not responsible for the privacy policies or practices of any third party or resources own / controlled by a third party (including resources take from us without our permission).

Who's in control? We are the "controller" of all personal data collected and used for The Friends of Southwark Park and for any other purposes set out in this Privacy Policy. This means that we are responsible for deciding how and why your data is used and for ensuring that your data is handled legally and safely. Our committee has ultimate responsibility within Friends of Southwark Park for making sure your data is treated in accordance with this Privacy Policy and the law. Please contact our committee by email to [fospsecretary\[at\]outlook.com](mailto:fospsecretary[at]outlook.com)

What data do we collect and where from?

To enable us to perform our obligations we collect some data directly from you when apply for membership or attend one of our General Meetings and complete our attendance sheet.

General Meeting attendance: Friends Of Southwark Park hold General Meetings that are open to the public and we ask all those attending our General Meetings to provide their first name and surname by writing on our attendance sheet in block capitals. Anyone who does not wish to give their first name and surname should not complete the attendance sheet. Attendance sheets are initially on display to those attending our meetings and you consent to sharing your information in this way when you complete the attendance sheet. Our General Meetings are open to the public so any personal information you consent to give on an attendance sheet is assessable to anyone attending the meeting. It is against our code of conduct to take photographs at our meeting without permission. Please do not sign attendance sheets with your signature. To attend our Annual General Meeting, Committee meetings or a Special General Meeting you will need to be a member.

This attendance approach will be updated once Friends of Southwark Park has received advice about fire safety regulations for the venues we use. It is currently unclear if fire regulations (permitted number / record keeping / venue hire requirements) will prevent an unknown number of public to attend Friends of Southwark Park meetings in the future.

Membership: When you apply to become a member or volunteer with us, you will give us information voluntarily. You may also give us information when using our Website and other social media resources. We collect some data directly from you when you apply for Friends of Southwark Park membership using the required paper application form. This data may include the following:

your full name;
your email address;

your postcode and address;
your age or date of birth (The trustees of an unincorporated association must be a minimum of 18 years. The law says people under 18 cannot be trustees or take on the administrative rights and duties of full members, like voting)
phone number/s;
Disclosure and Barring Service (DBS) information;
a personal description;
The nine characteristics protected under the Equality Act 2010: age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex & sexual orientation.

The data that we collect from you will be transferred to and stored at the Friends of Southwark Park official address on paper or on computer or our secure online systems (e.g. the cloud and outlook.com). By submitting your personal data, you agree to this transfer, storing or processing. We also collect information that you voluntarily provide to us when you contact us with queries, complaints, comments or praise, or information that you voluntarily post about yourself (Voluntary Data).

We are collecting data for the following reasons:

We have your consent
Processing is necessary for the performance of a contract or to take steps to enter into a contract;
Processing is necessary for compliance with a legal obligation;
Processing is necessary to protect the vital interests of a data subject or another person;
Processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in our organisation as Data Controller;
Necessary for the purposes of legitimate interests pursued by our organisation or a third party, except where such interests are overridden by the interests, rights or freedoms of the data subject.

Collection of your Personal Information from our website and other social media resources:

Each time you visit our Website or our other online resources, we may automatically collect certain information. This information includes technical information, such as Internet Protocol (IP) addresses used to connect your computer to the internet, your login information, browser type and version, browser plug-in types and versions, operating system and platform and information relating to what pages you have viewed. We collect information about how you use Friends of Southwark Park resources using cookies and similar technology. This includes your viewing history, IP addresses, device identifiers and information about how long you have stayed on certain pages or what pages you have clicked on.

We also collect information from social networking sites such as Facebook and Twitter, for example likes, shares, tweets and posts about Friends of Southwark Park. This information is used for internal analysis purposes. We will collect any comments, statements other material made about Friends of Southwark Park and we may provide this information as evidence to the police, Twitter, Facebook and courts as appropriate. We also collect information to use as evidence for conduct including membership application consideration and or when an existing member breaks our Code of Conduct / social media policies.

We may collect data and information from a range of sources to verify if an applicant for membership is eligible. We may also collect data and information from a range of sources to verify if a member is eligible to be a trustee to ensure:

- they are legally eligible to act as a Friends of Southwark Park trustee;
- they are not disqualified to act as a company director;
- they do not have an unspent conviction for an offence involving dishonesty or deception (such as fraud);
- they are not an undischarged bankrupt (or subject to sequestration in Scotland), nor do you have a current composition or arrangement including an individual voluntary arrangement (IVA) with your creditors;
- they have not been removed as a company director or charity trustee because of misconduct or mismanagement.

Friends of Southwark Park may also be required to use DBS checks and checking services and credit checking services.

We are a non-party political organisation and we may collect data and information from publicly accessible websites, such as Facebook and Twitter, to inform us when members might be breaking our Code of Conduct.

What do we use your data for?

It is important that you understand how and why we use the personal data that we collect about you. This section sets out the different purposes for which we process personal data and which types of personal data we need for each purpose.

We will endeavour to keep data only for as long as we need it. This means that we will delete it when it is no longer needed. We will keep some records permanently if we are legally required to do so and may keep some other records for an extended period of time to follow best practice. For example, it is currently best practice to keep employment records for 5 years and financial records for a minimum of 7 years, to support HMRC audits.

We will keep all your personal data for as long as you remain a member. If you cease to be a member we will delete all your personal data however we may need to keep your data after you cancel your membership for limited purposes, for example if we need your data in order to respond to any complaints or claims that you make. If this is the case, we will only keep the data for as long as we need to in order to fulfil those purposes.

Using Personal Information

Friends of Southwark Park may use your personal information to:

- enable your access to and use of the website and make electronic bookings for services;
- publish your feedback on the website in a way that ensures your full name and personal data are not disclosed;
- send you marketing communications including but not limited to newsletters, offers and promotions and contact you for the purpose of discussing your membership and our services;

Your information will be held confidentially. Occasionally we may need to disclose information to our Data Processor or sub-Processor. Where we need to do so, the Data Processor or sub-Processor

in question will be obligated to use that personal information in accordance with the terms of this privacy statement.

In addition to the disclosures reasonably necessary for the purposes we have identified in this notice, Friends of Southwark Park may disclose your personal information to the extent that it is required to do so by law, in connection with any legal proceedings or prospective legal proceedings, national security and in order to establish, exercise or defend its legal rights.

Becoming a member

Anyone wishing to become a member must complete the required membership application form. Old versions of membership application forms cannot be used. We used the personal data you provide to consider your application. When you apply to become a member we have a legitimate organisational interest to use your information to respond to you. We also rely on obtaining your consent to use your personal information. For example, we will seek your consent to receive marketing via email and mail about Friends Of Southwark Park.

We may use your information for a number of purposes including the following:

1. Compliance with legal, regulatory and corporate governance obligations and good practice;
2. To maintain our membership list;
3. To identify those permitted to vote at our meetings;
4. To provide you with information about our work or our activities that you have agreed to receive;
5. Ensure we know how you prefer to be contacted;
6. Keep a record of your relationship with us;
7. For any concerns about your application for membership, membership or conduct;
8. Hall hire forms and records;
9. Meeting attendance forms and records;
10. Meeting notes and minutes (these may be published online);
11. We will use the information we get from your use of our Website and other online services and resources to:
 - i. administer our Website and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes;
 - ii. improve our Website to ensure that content is presented in the most effective manner for you and for your computer;
 - iii. allow you to participate in interactive features of our service, when you choose to do so;
 - iv. as part of our efforts to keep our Website safe and secure;
 - v. measure or understand the effectiveness of advertising we serve to you and others, and to deliver relevant advertising to you;
 - vi. make suggestions and recommendations to you and other users of our Website;
12. any other reasonable purposes of Friends of Southwark Park, acting always in accordance with the data protection law (as amended from time to time).

We will use the information you give us to:

1. perform services you have requested (such as providing you with Membership or providing you with information you have asked for);
2. administer and manage Friends of Southwark Park and perform our objects;
3. provide you with information;
4. notify you about changes;

5. ensure that content from our Website is presented in the most effective manner for you and for your computer;
6. Hire the TA Hall;
7. Include you in meeting minutes and notes;
8. Record your attendance at meetings; and
9. any other reasonable purposes of Friends of Southwark Park, acting always in accordance with the data protection law (as amended from time to time).
10. Friends of Southwark Park work very closely with London Borough of Southwark and council staff attend our General Meetings and will have sight of our attendance list and meeting minutes (draft and final).
11. Our General Meetings are open to the public and therefore the public will have sight of our attendance list and meeting minutes (draft and final).
12. Only members are allowed to vote at our meetings. Once we have accepted you as a member you will be able to vote at our Annual General Meetings, Special General Meetings and General Meetings. To ensure only members vote we use voting cards and therefore we need, and are required to maintain, a membership list and to identify members.

Your rights:

You have the right to:

1. Have any inaccuracies in your data corrected. If you would like to update the details we hold about you other than online, please contact fospsecretary[at]outlook.com or write to: Friends Of Southwark Park c/o Mayflower Hall, 1 Neptune St, London SE16 7JP;
2. Request that we delete your personal data;
3. Object to profiling;
4. Request that we do not process your personal data for marketing purposes;
5. You have a right to request a copy of the personal information we hold about you. We require you to prove your identity with two pieces of approved identification. Please address requests to the Secretary and we will respond within one month, of receipt of your written request and confirmed ID. Please provide as much information as possible about the nature of your contact with us to help us locate your records. This request is free of charge unless the request is manifestly unfounded or excessive.

Competitions and surveys

We use Competition Data for the purposes of allowing you to participate in competitions and to carry out any activities required in relation to those competitions, for example contacting you to let you know you have won a prize and using your address to send your prize to you. We will also use your contact details to contact you from time to time to ask you to participate in surveys to help us to improve our offerings. We use Survey Data for the purposes of analysing insights and information to enable us to improve our services.

Improving our services

We use information and data to help us monitor, analyse and improve Friends of Southward Park. We use this data to help us understand which content and services are most interesting and enjoyable for our users and Park users. This helps us to make sure that we are providing you with the best possible products and services. We may use information and data for marketing and advertising purposes. This can include sending you personalised advertisements that use your name in the advertisement. Friends of Southwark Park may capture a copy of our website, other online

resources and documents periodically to archive data that may be of historical or statistical value and to use this data in the future for internal purposes or to allow third parties access to this data for research purposes, for example if someone is writing a book and the data we hold in our archives is useful for that book. We periodically review the data that we keep in our archive and we will delete or anonymise your data held in the archive where we consider it is no longer of value or interest.

Email marketing

We may use your email address to send you email marketing (including our newsletter, information about events, new shows, and competitions). You can opt out of receiving marketing emails at any time by emailing Friends of Southwark Park Secretary or writing to us at our official address. It may take up to 10 working days for your change in preference to take effect and the change will not affect any marketing emails which have already been scheduled to be sent in the future. If you opt out of email marketing, we will still need to send you service communications by email from time to time, such as information about changes to our organisation and meeting notices.

What is our legal basis for using your data?

Data protection law says that we have to tell you the legal basis that we rely on to process your personal data for the purposes that we have notified to you. This section tells you what that legal basis is in relation to each of the purposes set out above. We process your personal data on the basis that it is in our legitimate interests to carry out these activities.

Purpose: Your membership, meetings and providing you with our services

Legitimate interests and consent: To ensure Friends of Southwark Park members and park users enjoy the best experience possible, to help us deliver our objects in accordance with our constitution and the law;

Purpose: Improving our services

Legitimate interests and consent: To make sure that we continue to improve our service and provide our members and park users with the best and most effective service possible.

Purpose: Advertising, newsletters, promotion and contact;

Legitimate interests and consent: To provide Advertising, newsletters, promotion and contact that is relevant to you to ensure that you have the best experience possible of Friends of Southwark Park

Unless we can show that we have a compelling legitimate reason to continue processing your personal data, we will stop processing it.

You have the right to object to us processing your personal data. If you do not agree to us processing your personal data by positively opting in (e.g. by ticking a box on the membership application form) will not be able to process your application form which will be destroyed securely after 3 months and will not be returned to you.

Not agreeing to us processing your personal data by positively opting (e.g. by ticking a box on the membership application form) will terminate your membership. Remember that you can cancel your membership at any time.

In respect of the use of your email address for email marketing purposes, we process this on the basis that we have your consent to do so because there is a clear opt in tick box on the membership application form.

How can you contact us?

If you have any questions or concerns about this Privacy Policy and/or our processing of your personal data, you can get in touch with us using: FOSPsecretary[at]outlook.com or by writing to Friends of Southwark Park c/o Mayflower Hall, 1 Neptune St, London SE16 7JP.

What if you have a complaint?

You have a right to complain to the Information Commissioner's Officer (ICO), which regulates data protection compliance in the UK, if you are unhappy with how we have processed your personal data. You can find out how to do this by visiting www.ico.org.uk

What if this policy changes?

We may make changes to this Privacy Policy from time to time. Any changes we make will be displayed on our website:

www.southwarkpark.org

This policy was agreed by Friends of Southwark Park Committee on:

Official address:

c/o Mayflower Hall (Old Assembly Hall), 1 Neptune St, London SE16 7JP

Secretary contact:

FOSPsecretary[at]outlook.com

This Privacy Notice was agreed and adopted on 11th June 2018 by Friends of Southwark Park Committee.

Barry Duckett

Chair

Jerry Hewitt

Secretary