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Date created	14/03/2018
Date reviewed	14/03/2018
Date of next review	14/03/2023
Approved by	Mark Farnell

## **POLICY: PRIVACY AND DATA PROCESSING POLICY**

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### **POLICY**

1.1 This policy explains when and why we collect personal information about our members' staff volunteers and therapists and, how we use it and how we keep it secure and your rights in relation to it.

1.2 We may collect, use and store your personal data, as described in this Policy and as described when we collect data from you.

1.3 We reserve the right to amend this Policy from time to time without prior notice. You are advised to check our website [www.bmstc.org](http://www.bmstc.org) or our Centre noticeboard regularly for any amendments (but amendments will not be made retrospectively).

1.4 We will always comply with the General Data Protection Regulation (GDPR) when dealing with your personal data. Further details on the GDPR can be found at the website for the Information Commissioner ([www.ico.gov.uk](http://www.ico.gov.uk)). For the purposes of the GDPR, we will be the "controller" of all personal data we hold about you.

### **2. BMSTC Contact**

2.1 We can be contacted via the Centre Manager Pippa Vincent-Cooke at the address given above or by email at [pippa@bmstc.org](mailto:pippa@bmstc.org) Tel. 0118 9016000.

### **3. What information we collect and why.**

<b>Type of information</b>	<b>Purposes</b>	<b>Legal basis of processing</b>
The Member staff volunteer or therapist's name, address, telephone contact details and e-mail address.	Managing the Member's and volunteer's membership of BMSTC; Issuing information for example newsletters, blogs and information useful for our members from MS Society, fundraising, events information  Managing staff employment, payroll, pensions National Insurance and Income Tax  Managing therapist's provision of services to BMSTC and its members	Performing BMSTC's obligations with the Member, member of staff volunteer or therapist. For the purposes of our legitimate interests in operating BMSTC.
The names and ages of the Member's dependants	Managing the Member's and their dependants' membership of BMSTC	Performing BMSTC's obligations with the Member

Emergency contact details	Contacting next of kin in the event of emergency	Protecting the Member staff volunteer and therapists vital interests and those of their dependants
Date of birth / age related information	Managing membership categories which are age related	Performing BMSTC's obligations with the Member.
Gender	Provision of adequate facilities for members staff volunteers and therapists	For the purposes of our legitimate interests in making sure that we can provide sufficient and suitable facilities (including changing rooms and toilets) for each gender.
The Member's name and e-mail address	Creating and managing BMSTC's Membership Register, Employment Register, Volunteers register and Therapists Register	Consent. We will seek the Member staff volunteer and therapists consent on their application forms and by separate Members Volunteers and Therapists Data Subject Consent Forms. The Member staff member, volunteer and therapist may withdraw their consent at any time by contacting us by e-mail or letter to tell us that they no longer wish their details to appear in the Membership Staff Volunteer or Therapist Registers as appropriate
Bank account details of the member or other person making payment to BMSTC	Managing the Member's and their dependants' membership of the BMSTC, the provision of services and events donations and payments staff payroll and payments to Therapists or reimbursement of expenses to volunteers	Performing BMSTC's obligations with the Member, staff member volunteer and therapist
Member's name and email address	Passing to Therapists in order to provide the benefits of treatments and therapies to members of BMSTC	For the purposes of our legitimate interests in operating BMSTC and performing BMSTC's obligations with members
Therapist's name, address, email addresses, phone numbers and relevant qualifications and/or experience.	Managing therapies at BMSTC.	For the purposes of our legitimate interests in ensuring that we can contact those offering therapies and provide details of therapists to members.
Health Data of members and staff and volunteers	Emergency treatment for members staff and volunteers and providing therapies for members of BMSTC	Health details, used strictly and only in the event of an emergency and in connection with providing therapies for members and the welfare of members staff and volunteers

#### 4. How we protect your personal data

4.1 We will not transfer your personal data outside the UK without your consent.

4.2 We have implemented generally accepted standards of technology and operational security in order to protect personal data from loss, misuse, or unauthorised alteration or destruction. We will notify you promptly in the event of any breach of your personal data which might expose you to serious risk.

4.3 Please note however that where you are transmitting information to us over the internet this can never be guaranteed to be 100% secure.

4.4 For any payments which we take from you online we will use a recognised online secure payment system.

4.5 We will notify you promptly in the event of any breach of your personal data which might expose you to serious risk.

## **5. Who else has access to the information you provide us?**

5.1 We will never sell your personal data. We will not share your personal data with any third parties without your prior consent (which you are free to withhold) except where required to do so by law or as set out in the table above or paragraph 5.2 below.

5.2 We may pass your personal data to third parties who are service providers, agents and subcontractors to us for the purposes of completing tasks and providing services to you on our behalf (e.g. to print newsletters and send you mailings). However, we disclose only the personal data that is necessary for the third party to deliver the service and we have a contract in place that requires them to keep your information secure and not to use it for their own purposes.

## **6. How long do we keep your information?**

6.1 We will hold your personal data on our systems for as long as you are a member of BMSTC and for as long afterwards as is necessary to comply with our legal obligations. We will review your personal data every year to establish whether we are still entitled to process it. If we decide that we are not entitled to do so, we will stop processing your personal data except that we will retain your personal data in an archived form in order to be able to comply with future legal obligations e.g. compliance with tax requirements and exemptions, and the establishment exercise or defence of legal claims.

6.2 We securely destroy all financial information once we have used it and no longer need it.

## **7. Your rights**

7.1 You have rights under the GDPR:

- (a) to access your personal data
- (b) to be provided with information about how your personal data is processed
- (c) to have your personal data corrected
- (d) to have your personal data erased in certain circumstances

(e) to object to or restrict how your personal data is processed

(f) to have your personal data transferred to yourself or to another business in certain circumstances.

7.2 You have the right to take any complaints about how we process your personal data to the Information Commissioner: <https://ico.org.uk/concerns/> 0303 123 1113.

Information Commissioner's Office Wycliffe House Water Lane Wilmslow Cheshire SK9 5AF

For more details, please address any questions, comments and requests regarding our data processing practices to our Centre Manager ([pippa@bmstc.org](mailto:pippa@bmstc.org)) or if unavailable to our Data Protection Officer Mark Farnell ([Mark@bmstc.org](mailto:Mark@bmstc.org))