## **Appendix**

# PRIVACY POLICY THE ROTARY CLUB OF SHEPPERTON AND SUNBURY

#### Introduction

The Rotary Club of Shepperton and Sunbury, UK (the "Rotary Club") respect your privacy and are committed to protecting it by complying with this privacy policy ("Policy"). Safeguarding the data entrusted to our care by our club members, program participants, and others is of the utmost importance to us.

This Policy describes our practices for collecting, using, protecting, disclosing, and disposing of personal data. It also describes the types of data that we may collect from you or that you may provide to us when you:

- Visit our website, www.shepsunrotary.org.uk ("Website")
- Join or maintain membership in this Rotary Club
- Interact with Rotary District 1145, Rotary International ("RI"), Rotary International Britain and Ireland ("RIBI"), The Rotary Foundation, and partner organizations
- Register for or attend events we host
- Use our services
- Participate in our programs

If you are a resident of the European Union (EU) or European Economic Area (EEA) and we collect your personal data, we will process your data in accordance with applicable laws that regulate data protection and privacy. This includes, without limitation, the EU General Data Protection Regulation (2016/679; "GDPR") and EU member state national laws that implement or regulate the collection, processing, and privacy of your personal data (together, "EU Data Protection Law"). This Policy provides information on your legal rights under EU Data Protection Law and how you can exercise them.

#### Data We Collect About You and How We Collect It

We collect several types of personal data, including information by which you could be personally identified, such as your name, postal address, email address, telephone number, gender, financial data, or other sensitive information that might identify you ("personal data").

We collect may data from the following people:

- Users of our Website
- Members of the Rotary Club and its Rotaract clubs
- Members of Interact clubs, if the Interactors' parents or legal guardians have consented
- People who participate in Rotary Club programs, such as Rotary Youth Leadership Awards (if applicable, with the consent of parents or legal guardian)
- People who participate in Rotary Club events

#### We collect this data:

- Directly from you when you provide it to us
- From RIBI, RI or from Rotary District 1145, The Rotary Foundation, and partner organizations

Because of the global nature of Rotary, the Rotary Club may hold and process personal data that is collected from you, Rotary District 1145, RIBI, RI, and partner organizations around the world, including within the EU and EEA.

This also means that if you are a resident of the EU or EEA, your personal data may be transferred from the EU or EEA to RI headquarters in the United States and may also be accessed and processed from RI's offices in Australia, Brazil, India, Japan, Korea, and Switzerland. For more information, refer to Rotary's Privacy Policy (rotary.org/privacy).

#### **Data You Provide to Us**

We collect personal data you provide when you interact with our Website or with the Rotary Club, including any interaction offline or in person, such as when you:

- Contact this Rotary Club to make an inquiry, including an inquiry about membership
- Join this Rotary Club or any associated Rotaract or Interact club
- Use services on our Website, including:
  - o Donating to the Rotary Club's foundation
- Register for Rotary Club events
- Provide personal data on paper forms
- Submit applications for programs such as scholarships

## Usage Details, IP Addresses, Cookies, and Other Technologies

As you interact with our Website, we may automatically collect data about your equipment and your browsing actions and patterns, including

## **How We Use Your Personal Data**

We use the personal data about you that we collect or that you provide to us to:

- Present our Website and its content to you
- Perform our core business purposes, including:
  - Fulfilling the Rotary Club's obligations to its members, program participants, and other individuals and entities, such as:
  - Processing financial transactions
  - Supporting fundraising efforts
  - Facilitating event planning
  - Communicating key organizational messages through Rotary Club publications and other materials
  - o Supporting the programs and members of the Rotary Club
  - Complying with legal requirements

We will not share personal data with, or sell it to, third parties.

## Lawful Grounds on Which We Collect and Process Personal Data

We process your personal data for the above purposes, relying on one or more of the following lawful grounds under EU Data Protection Law:

- When you have freely provided your specific, informed, and unambiguous consent for our Rotary Club to process your personal data for particular purposes
- When we agree to provide services to you, in order to set up and perform our contractual obligations to you and/or enforce our rights
- When we need to process and use your personal data in connection with our legitimate interests and need to be able to effectively manage and operate our Rotary Club; we will always seek to pursue these legitimate interests in a way that does not unduly infringe on your legal rights and freedoms and, in particular, your right to privacy; and/or
- When we need to comply with a legal obligation or for the purpose of us being able to establish, exercise, or defend legal claims

Please also note that some of the personal data that we may receive and that we may process may include what is known as "sensitive" or "special category" personal data about you, for

example, personal data regarding your health. This is not the type of data that the Rotary Club routinely collects, but if we process such sensitive or special category data, we will do it only in specific situations in which:

- You have provided us with your explicit consent to use it
- We have a legal obligation to process such data in accordance with EU Data Protection Law
- It is needed to protect your vital interests (or those of someone else), for example, in a medical emergency
- You have clearly chosen to publicize such information; or
- It is needed in connection with a legal claim that we have or may be subject to

#### **Disclosure of Your Personal Data**

We may disclose aggregated data about our users, or data that cannot be used to identify any individual, without restriction.

We may disclose the personal data that we collect or that you provide as described in this Policy to:

- Rotary International, to meet Rotary Club membership and program requirements (read Rotary's privacy policy at <a href="rotary.org/privacy">rotary.org/privacy</a>)
- Rotary District 1145 to meet program requirements and other obligations (read District 1145's privacy policy (available online)

We may also disclose your personal data:

- To comply with a court order, law, or legal process, or respond to a government or regulatory request
- If we believe disclosure is necessary or appropriate to protect the rights, property, or safety of members, participants in this Rotary Club's programs and events, this Rotary Club, Rotary District 1145, RIBI, RI or others

We may disclose your personal data to certain third-party organizations that will process data solely in accordance with our instructions ("data processors"), such as companies and/or organizations that support our business and operations (for example, providers of web or database hosting, IT support, payment providers, or event organizers), as well as professionals we hire such as lawyers, insurers, auditors, or accountants. We use only Data Processors that can guarantee to us that they have adequate safeguards to protect the personal data they process on our behalf.

In certain circumstances, we may also disclose your personal data to third parties called "Data Controllers." Due to the nature of the business of the Data Controllers, they will make their own determinations about how they process your personal data. As Data Controllers, they are required to follow the EU Data Protection Law, to protect personal data with adequate safeguards, and to notify you if their processing goes beyond the instructions the Rotary Club provided to the Data Controller.

## **How Long We Retain Your Personal Data**

The Rotary Club retains personal data that identifies you as long as necessary according to circumstances — for example, as long as you are a member of this club or have a relationship with this Rotary Club. The criteria we use for determining the relevant retention and disposal periods are based on the purpose for which we hold data and the reasonable expectations of those whose personal data we collect, taking into account various legislative requirements and guidance issued by relevant EU regulatory authorities.

#### **Disposing of Your Personal Data**

Personal data that we no longer need will be disposed of and/or anonymized so you can no longer be identified from it.

#### **Choices About How We Use and Disclose Your Personal Data**

We have created ways for you to control the use and disclosure of your data. For tracking technologies and advertising: You can set your browser to refuse all or some cookies or to alert you when cookies are being sent. If you disable or refuse cookies, note that some parts of the Website may be inaccessible to you or may not function properly.

## **Your Personal Data Rights**

You have a "subject access request" right, under which you can request information about the personal data about you that we hold, what we use that personal data for, who it may be disclosed to, and certain other information.

You may request in writing:

- That we correct personal data that we hold about you that is inaccurate or incomplete
- That we erase your personal data without undue delay if we no longer need to hold or process it
- To object to any automated processing (if applicable) that we carry out in relation to your personal data; for example, if we conduct any automated credit scoring
- To object to our use of your personal data for direct marketing
- To object and/or to restrict the use of your personal data to a purpose other than those set out above unless we have a compelling, legitimate reason; or
- That we transfer personal data to another party, where the personal data has been collected with your consent or is being used to perform services under a contract with you and is being processed by automated means

So that we can fully comply, please note that these requests may also be forwarded to third-party Data Processors that are involved in the processing of your personal data on our behalf.

If you would like to exercise any of the rights above, please contact us at info@shepsunrotary.org.uk

If you make a request and are not satisfied with our response, or if you believe that we are illegally processing your personal data, you have the right to complain to the Information Commissioner's Office, Wycliffe House Water Lane, Wilmslow, Cheshire SK9 5AF Telephone 0303123113

## Children Under the Age of 16

Our Website is not intended for children under 16 years of age. We do not knowingly collect personal data from children under 16 without parental consent. No one under age 16 may provide any personal data through our Website. If you are under 16, do not: use or provide any personal data on our Website or on or through any of its features, register on our Website, make any purchases through our Website, use any of the interactive or public comment features of our Website, or provide to us any personal data about yourself, including your name, address, telephone number, email address, or any screen name or user name. If we learn that we have collected or received personal data from a child under 16 without verification of parental consent, we will delete that personal data. If you believe we might have any personal data from or about a child under 16, please contact us at info@shepsunrotary.org.uk

#### **Data Security**

Personal data is protected on a private part of the website and can only be accessed by the website

#### **Changes to Our Privacy Policy**

The Rotary Club may change, add, or remove portions of this Policy at any time. These modifications shall take effect immediately on being posted on this page. The date the Policy was last revised is noted at the bottom of the page. It is your responsibility to review this Policy for any changes.

# **Contact Information**

If you have any questions about our Rotary Club's privacy protection practices, please contact us at info@shepsunrotary.org.uk.

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