

# Privacy Policy – Southampton University Steampunk Society (Krakensoc)

## What is the purpose of this document?

We, Krakensoc, are committed to protecting the privacy and security of your personal information.

This privacy notice describes how we collect and use personal information about you during and after your working relationship with us, in accordance with the General Data Protection Regulation (GDPR).

It applies to all members of the organisation.

Krakensoc, in this context, is a "data controller". This means that we are responsible for deciding how we hold and use personal information about you. We are required under data protection legislation to notify you of the information contained in this privacy notice.

The person responsible for data protection within our organisation is the current Captain (President) who can be contacted via the society email, [kraken@soton.ac.uk](mailto:kraken@soton.ac.uk), or by the personal contact details provided on the Groups Hub at [www.susu.org](http://www.susu.org).

This notice applies to current and former members (hereafter referred to collectively as "members"). This notice does not form part of any contract to provide services. We may update this notice at any time. When changes are made to this document we will inform you electronically of the update.

It is important that you read this notice, together with any other privacy notice we may provide on specific occasions when we are collecting or processing personal information about you, so that you are aware of how and why we are using such information.

## Data protection principles

We will comply with data protection law. This says that the personal information we hold about you must be:

1. Used lawfully, fairly and in a transparent way.
2. Collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes.
3. Relevant to the purposes we have told you about and limited only to those purposes.
4. Accurate and kept up to date.
5. Kept only as long as necessary for the purposes we have told you about.
6. Kept securely.

## The kind of information we hold about you

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

There are "special categories" of more sensitive personal data which require a higher level of protection.

We may collect, store, and use the following categories of personal information about you:

- Personal contact details such as name, title, and personal email addresses.
- Information about your use of our information and communications systems.
- Photographs.

## How is your personal information collected?

We typically collect personal information about members through the membership joining process directly from members. We may sometimes collect additional information from third parties including the University of Southampton and the University of Southampton Students' Union.

We may collect additional personal information in the course of member-related activities throughout the period of your membership with us.

## How we will use information about you

We will only use your personal information when the law allows us to. Most commonly, we will use your personal information in the following circumstances:

1. Where it is necessary to maintain a record of society membership.
2. Where we need to contact you regarding society activities.
3. Where we need to comply with a legal obligation.
4. Where it is necessary for our legitimate interests, and your interests and fundamental rights do not override those interests.
5. Where you are a significant member of the society (e.g. current or past committee member) that we need to introduce to another member or third party.

We may also use your personal information in the following situations, which are likely to be rare:

1. Where we need to protect your interests (or someone else's interests).
2. Where it is needed in the public interest or for official purposes.

## Situations in which we will use your personal information

Collection of the categories of information listed above (See "The kind of information we hold about you") primarily allows us to keep you informed and involved with society business, and enables us to comply with any legal obligations. In some cases we may use your personal information to pursue legitimate interests of our own, provided your interests and fundamental rights do not override those interests. Situations in which we may need to process your personal information include:

- Contacting you to inform you of, or for the purposes of facilitating, society activities.
- Maintaining your personal details (e.g. your name and preferred contact details), including ensuring effective communications with you.
- Advertising society activities using photographic material (with your consent if necessary).
- Maintaining records of society membership.

- Keeping financial records.
- Assessing qualifications for a particular task.
- Dealing with legal disputes involving you, or other members, including accidents.
- Complying with health and safety obligations.
- To prevent fraud.
- To ensure network and information security, including preventing unauthorised access to our computer and electronic communications systems and preventing malicious software distribution.
- Managing society alumni relations.
- Managing complaints made to us.

(Some of the above grounds for processing will overlap and there may be several grounds which justify our use of your personal information.)

### **If you fail to provide personal information**

If you fail to provide certain information when requested we may not be able to offer you full access to society activities, or we may be prevented from complying with our legal obligations (such as to ensure the health and safety of our members).

### **Change of purpose**

We will only use your personal information for the purposes for which we collected it, unless we reasonably consider that we need to use it for another purpose, where this is compatible with the original purpose. If we need to use your personal information for an unrelated purpose, we will notify you and will explain the legal basis which allows us to do so.

Please note that we may process your personal information without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

### **How we use particularly sensitive personal information**

"Special categories" of particularly sensitive personal information (e.g. information about health and medical conditions) require higher levels of protection. We need to have further justification for collecting, storing and using this type of personal information. We may process special categories of personal information in the following circumstances:

1. In limited circumstances, with your explicit written consent.
2. Where we need to carry out our legal obligations, in line with our privacy policy.
3. Where it is needed in the public interest, in line with our privacy policy.

Less commonly, we may process this type of information where it is needed in relation to legal claims or where it is needed to protect your interests (or someone else's interests) and you are not capable of giving your consent, or where you have already made the information public.

We may also process such information about members in the course of legitimate society activities with the appropriate safeguards.

### **Do we need your consent?**

We do not need your consent if we use special categories of your personal information in accordance with our written policy to carry out our legal obligations or exercise specific rights in the field of law. In other circumstances we will approach you for your written consent to allow us to process certain particularly sensitive data. If we do so,

we will provide you with full details of the information that we would like and the reason we need it, so that you can carefully consider whether you wish to consent.

### **Information about criminal convictions**

We may only use information relating to criminal convictions where the law allows us to do so. This will usually be where such processing is necessary to carry out our obligations and provided we do so in line with our privacy policy.

Less commonly, we may use information relating to criminal convictions where it is necessary in relation to legal claims, where it is necessary to protect your interests (or someone else's interests) and you are not capable of giving your consent, or where you have already made the information public.

We may also process such information about members in the course of legitimate society activities with the appropriate safeguards.

We envisage that we will not hold information about criminal convictions.

We will only collect information about criminal convictions if it is appropriate given the nature of the role and where we are legally able to do so. Where appropriate, we will collect information about criminal convictions where we need that information because of your role or our activities. We may be notified of such information directly by you in the course of your membership with us.

We are allowed to use your personal information in this way to carry out any relevant legal obligations.

### **Data sharing**

We may have to share your data with third parties.

We require third parties to respect the security of your data and to treat it in accordance with the law.

We may transfer your personal information outside the EU for any of the purposes described in this notice.

If we do, you can expect a similar degree of protection in respect of your personal information.

### **Why might you share my personal information with third parties?**

We may share your personal information with third parties where required by law, where it is necessary to facilitate society activities, or where we have another legitimate interest in doing so. We may be subject to a legal requirement (with or without your consent) to share your personal information with the University of Southampton, University of Southampton Students' Union or a government agency (such as the police or security services or other statutory authorities with investigatory powers) under special circumstances (e.g. relating to tax, crime or health and safety). Where feasible and appropriate, we will notify you of our intention to share such information in advance.

### **Which third-party service providers process my personal information?**

"Third parties" includes third-party service providers (including contractors and designated agents) and other entities within our group.

We will share personal information with the University of Southampton Students' Union as part of being an affiliated club or society, in order to process your membership, and to run the club or society.

We may share some of your personal information with the University of Southampton, only if there is a specific need to.

We may need to share your personal information with third parties, as part of arrangements related to your membership of the society. In such cases, we will ask for your explicit consent prior to sharing this information.

### **How secure is my information with third-party service providers**

Any third-party service providers and other entities in the group are required to take appropriate security measures to protect your personal information under the general law or in line with our policies. We will not allow third-party service providers to use your personal data for their own purposes. We will only permit them to process your personal data for specified purposes and in accordance with our instructions.

## **Data retention**

### **How long will you use my information for?**

We will only retain your personal information for as long as necessary to fulfil the purposes we collected it for, and usually for 10 years after your membership ceases. This may include for the purposes of satisfying any legal, accounting, or reporting requirements. To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

In some circumstances we may anonymise your personal information so that it can no longer be associated with you, in which case we may use such information without further notice to you. Once you are no longer a member of the organisation we will retain and securely destroy your personal information in accordance with applicable laws and regulations.

## **Rights of access, correction, erasure, and restriction**

### **Your duty to inform us of changes**

It is important that the personal information we hold about you is accurate and current. Please keep us informed if your personal information changes during your relationship with us.

### **Your rights in connection with personal information**

Under certain circumstances, by law you have the right to:

**Request access** to your personal information (commonly known as a "data subject access request"). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.

**Request correction** of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.

**Request erasure** of your personal information. This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal information where you have exercised your right to object to processing (see below).

**Object to processing** of your personal information where we are relying on a legitimate interest and there is something about your particular situation which makes you want to object to processing on this ground. You also have the right to object where we are processing your personal information for direct marketing purposes.

**Request the restriction of processing** of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.

If you want to review, verify, correct or request erasure of your personal information, or object to the processing of your personal data, or request that we transfer a copy of your personal information to another party, please contact us using the above contact details.

**No fee usually required**

You will not have to pay a fee to access your personal information (or to exercise any of the other rights). However, we may charge a reasonable fee if your request for access is clearly unfounded or excessive. Alternatively, we may refuse to comply with the request in such circumstances.

**What we may need from you**

We may need to request specific information from you to help us confirm your identity and ensure your right to access the information (or to exercise any of your other rights). This is another appropriate security measure to ensure that personal information is not disclosed to any person who has no right to receive it.

**Right to withdraw consent**

In the limited circumstances where you may have provided your consent to the collection, processing and transfer of your personal information for a specific purpose, you have the right to withdraw your consent for that specific processing at any time. To withdraw your consent, please contact us using the above contact details. Once we have received notification that you have withdrawn your consent, we will no longer process your information for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so in law.

## **Changes to this privacy notice**

We reserve the right to update this privacy notice at any time, and we will provide you with a new privacy notice when we make any substantial updates. We may also notify you in other ways from time to time about the processing of your personal information.

**If you have any questions about this privacy notice, please contact us using the above contact details**

**Last updated: 05/09/2018**