



# DATA PROTECTION AND PRIVACY POLICY FOR THE INTERNATIONAL ROTARY FELLOWSHIP OF HEALTHCARE PROFESSIONALS (IRFHP)

## Abstract

We pride ourselves on our honesty and openness and will always be clear how, when and why we collect and process your information.

Next Review July 2024

## Data Protection and privacy policy for the International Rotary Fellowship of Healthcare Professionals (IRFHP)

### 1. Purpose

This privacy policy aims to give you information on how Rotary International Fellowship of Healthcare Professionals (IRFHP) (“we”, “us” or “our” in this privacy policy) collects and processes your personal data including any personal data collected or processed through the use of our website.

As a data controller we are responsible for your responsible for your personal data. We are committed to protecting your personal data. We will always endeavour to keep your personal data (including any personal data that we have access to through Rotary International) safe and secure. This privacy policy will inform you as to how we look after your personal data when you visit our website (regardless of where you visit it from) and tell you about your privacy rights and how the law protects you. We pride ourselves on our honesty and openness and will always be clear how, when and why we collect and process your information.

Developing a better understanding of our members and donors is crucial, and your personal data allows us to manage your membership and provide the services you are entitled to. The officers of IRFHP are required to comply this privacy notice.

This website is not intended for children and we do not knowingly collect data relating to children.

### 2. We collect information in the following ways:

2.1. 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).

2.2. We collect personal data from you in the following circumstances:

2.2.1 When you give it to us **DIRECTLY**. There are many ways you may give us your information. For example, when you join as a member, make a donation, request marketing to be sent to you or communicate with us either by phone, in writing, including email or in person.

2.2.2 When you give it to us **INDIRECTLY**. Your information may be shared with us by independent organisations, for example sites like PayPal or other such services. These independent third parties will only share your information when you have consented or where there is another legal basis for the personal data to be shared. You should check their Privacy Notice when you provide your information to understand fully how they will process your data.

- 2.2.3 Via **Social Media** Depending on your settings or the privacy notices for social media and messaging services like Facebook, WhatsApp, LinkedIn or Twitter, you might give us permission to access information from those accounts or services.
- 2.2.4 Via information available publicly This may include information found in places such as the website, Companies House and information that has been published in articles/newspapers.
- 2.2.5 From **Automated technologies or interactions**. As you interact with our website, we will automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies and other similar technologies. Please see our cookie policy [LINK] for further details.

### 3. If you fail to provide personal data

Where we need to collect personal data by law, or under the terms of a contract we have with you, and you fail to provide that data when requested, we may not be able to perform our services (including membership services) to you.

### 4. What personal information we collect and how we use it

- 4.1. We will only ever capture the minimum amount of information that we need to in relation to your membership, donation or services we provide to you.
- 4.2. The personal data we will usually collect is:
  - 4.2.1 Your name
  - 4.2.2 Your contact details
  - 4.2.3 Your date of birth
  - 4.2.4 Your bank or credit card details (as relevant to the service provided or the donation made)
  - 4.2.5 Details of the enquiry, service, or product
  - 4.2.6 **Marketing and Communications Data** includes your preferences in receiving marketing from us and our third parties and your communication preferences. It also includes fundraising campaigns. also collect, use and share **Aggregated Data** such as statistical or demographic data for any purpose. Aggregated Data could be derived from your personal data but is not considered personal data in law as this data will **not** directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy policy.
- 4.3. Where it is appropriate, we may also ask for additional information which will be explained to you at the time.

## **5. Membership details**

Membership details are collected in two ways:

- (a) Electronically - Using a third-party platform (Membermojo). Data entered on this platform is password protected and available only to selected members of the Board.
- (b) Manually When a new member joins by manually completing a form, the data on the paper copy is added to the electronic database. Once this is done the paper copy is shredded.

## **6. How we will use your data**

- 6.1. We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:
  - 6.1.1 Where we need to perform the contract we are about to enter into or have entered into with you.
  - 6.1.2 Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
  - 6.1.3 Where we need to comply with a legal obligation.
- 6.2. Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us if you need details about the specific legal ground we are relying on to process your personal data
- 6.3. We use legitimate interest basis of processing personal data for conducting core a number of our activities, these will include:
  - 6.3.1 Administer your membership or donation, including processing Gift Aid
  - 6.3.2 Provide you with the services, products or information you asked for
  - 6.3.3 Communicating organisational messages and information to members
  - 6.3.4 Facilitate meetings and other special event planning
  - 6.3.5 To present our website and its contents to you and to allow you to participate in interactive features on our website
  - 6.3.6 Keep a record of your relationship with us
  - 6.3.7 Understand how we can improve our services, products or information
  - 6.3.8 In any other way we may describe when you provide the information
  - 6.3.9 For any other purposes with your consent

## **7. Sensitive information**

We do not collect any personal information on members classified as 'sensitive' under GDPR.

## **8. Data Sharing**

8.1. We will ensure that there is a lawful basis for the sharing your personal data with any third party. There may be a need for us to share, or give access to, your personal data to third parties that provide us with services or host our applications/software that you may access, for instance:

8.1.1 Banking organisations – those that provide our banking/payment services

8.1.2 Our event management software provider if an event is being organised

8.1.3 HMRC – for Gift Aid

8.1.4 Paypal – our credit/credit card payment facility

8.2. We will ensure that data processing agreements, compliant to GDPR, are in place before sharing with, or giving access to, your data with any of our service/host providers.

8.3. Where we appoint a data processor we will ensure that data processing agreements, compliant with GDPR, are in place before sharing your data.

8.4. Sharing with third parties We will never commercially sell your personal data to anyone else. We will only ever share your personal data in other circumstances, not listed above, if we have your explicit and informed consent at the time of collection. However, we may need to disclose your details if required to the police, other agencies, for example HMRC, regulatory bodies or our legal advisors. We may also divulge your personal data to other Rotary organisations in the interest of promoting Rotary International's wider goals.

## **9. Marketing**

9.1. We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising.

9.2. We may use your Identity, Contact, Technical, Usage and Profile Data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which products, services and offers may be relevant for you (we call this marketing).

## **10. Opting out**

You can ask us to stop sending you marketing messages at any time by contacting us at any time.

## **11. How we keep your information safe and who has access to it**

We ensure that there are appropriate physical and technical controls in place to protect your personal details. For example, confidential paper records are securely stored. Confidential paper waste is shredded. We

review who has access to information that we hold to ensure that your personal information is only accessible by appropriate members of the IRFHP and our service/host providers. We do comprehensive checks on the companies we use before we work with them and put a contract in place that sets out our expectations and requirements, especially regarding how they manage the personal data they may have access to as part of providing those services. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

## **12. In the event of a data breach**

- 12.1. We have a duty to report certain types of personal data breaches to the relevant supervisory authority, and where feasible, we will do this within 72 hours of becoming aware of the breach.
- 12.2. If a breach is detected and likely to result in a high risk of adversely affecting you, we will inform you without undue delay.

## **13. Transfers of personal data outside of the UK**

- 13.1. Your personal information will be hosted securely within the UK. However, the IRFHP does run some operations outside the European Economic Area (EEA). Although they may not be subject to the same data protection laws as organisations based in the UK, we will take steps to make sure they provide an adequate level of protection in accordance with UK data protection law.
- 13.2. We will ensure that at least one of the following steps is implemented where personal data is transferred outside of the UK:
  - 13.2.1 We will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data.
  - 13.2.2 Where we use certain service providers, we may use specific contracts approved for use in the UK which give personal data the same protection it has in the UK.

## **14. How long we retain your information and how we keep it up to date**

- 14.1. We will only keep your information for as long as we need it to maintain your membership and assist you with your enquiry, donation, event registration or other services associated to your IRFHP membership.
- 14.2. There are statutory timescales on how long we should keep some of your information and we will ensure that we will abide by these regulations. We shall delete your information according to statutory limits, or according to guidance issued by the Information Commissioner or as outlined in specific event/data collection privacy policy statements.

## **15. Changes to the privacy policy and your duty to inform us of changes**

It is very important for us to keep your information accurate and up to date, please let us know if there are any changes to the personal data that we hold on you.

## 16. Your rights

The General Data Protection Regulations gives you certain rights and these are listed below for your convenience, further clarification of your rights is available on the Information Commissioners website <https://ico.org.uk/fororganisations/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/>

### 16.1. You have a right to:

16.1.1 **be informed** when your personal data is being collected, what is collected and how it will be used or shared.

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

16.1.3 request erasure of your personal data. This enables you to ask us to delete or remove personal data 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 data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

16.1.4 **Object to processing** of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

16.1.5 **Request restriction of processing** of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios:

- (a) If you want us to establish the data's accuracy.
- (b) Where our use of the data is unlawful but you do not want us to erase it.
- (c) Where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims.
- (d) You have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

16.1.6 **Request the transfer** of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a

structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

16.1.7 **Withdraw consent at any time** where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

16.2. Where you are requesting access to your personal data, this information will be provided free of charge. However, where the request is found to be manifestly unfounded repetitive or excessive then a reasonable fee will be charged. Alternatively, we could refuse to comply with your request in these circumstances.

16.3. The application should be made in writing, by letter or email, and addressed to the Chair of the Board whose contact details shown below, enclosing two proofs of identification.

16.4. We will only process your personal data as you would reasonably expect us to. You can opt out of our general member mailings at any time.

## **17. 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 your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

## **18. Time limit to respond**

We try to respond to all legitimate requests within one month. Occasionally it could take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

## **19. Changes to the privacy policy and your duty to inform us of changes**

19.1. It is very important for us to keep your information accurate and up to date, please let us know if there are any changes to the personal data that we hold on you.

19.2. Changes to this privacy notice We may change this privacy Notice from time to time. If we make any significant changes in the way we treat your personal information we will make this clear on our website <https://rotaryhealthprofessionals.org/> or by notifying you directly.

## **20. Third-party links**

This website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy policy of every website you visit.



## **21. Complaints**

21.1. You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK regulator for data protection issues ([www.ico.org.uk](http://www.ico.org.uk)) or to

21.2. Information Commissioner's Office

Wycliffe House  
Water Lane  
Wilmslow  
Cheshire,  
SK9 5AF

Helpline: 0303 123 1113 (local rate) or ++44 1625 545 745

21.3. We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

## **22. Contact details**

If you have any questions about this privacy policy or our privacy practices, please contact the Chair of IRFHP Dr Herbert Ederer at [hederer57@gmail.com](mailto:hederer57@gmail.com)

## **23. Glossary**

Legitimate Interest means the interest of our business in conducting and managing our business to enable us to give you the best service/product and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests.

We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law).

You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by contacting us.

Performance of Contract means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.

Comply with a legal obligation means processing your personal data where it is necessary for compliance with a legal obligation that we are subject to.