

# Privacy Policy

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## Introduction

1. The General Data Protection Regulation (“**GDPR**”) gives you rights in relation to the personal information that you provide to the Ecclesiastical Law Society CIO (“**the Society**”). That information is called “personal data” under GDPR. Any use that the Society makes of that personal data, which will include storing it in soft or hard copy or transmitting it by email or otherwise, is covered by this Privacy Policy.

## Scope and purpose of this Privacy Policy

2. As a data controller the Society respects your privacy and is committed to protecting your personal data. This Privacy Policy will inform you as to how we look after and use your personal data when you visit our website, or otherwise provide us with your personal data, and it will also tell you about your privacy rights and how the law protects you. If you have any questions about this Privacy Policy please email the Society’s Administrator: [admin@ecclawsoc.org.uk](mailto:admin@ecclawsoc.org.uk).
3. It is important that you read this Privacy Policy together with any other Privacy Policy or fair processing notice we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This Privacy Policy supplements the other notices and is not intended to override them.

## The purpose of the Society processing your personal data

4. The reason why the Society needs to process your personal data may be for any of the following reasons—
  - (a) to process payments and contact details received from those who wish to become members of the Society;
  - (b) to process payments and contact details from individuals who wish to attend any of the Society’s educational lectures, conferences and/or any other event organised by the Society;
  - (c) to allow the Society to stay in touch with members/non-members *via* general electronic communications and/or newsletters, in order to let them know about the Society’s educational lectures, conferences or any other events organised by the Society and also about matters of general interest relating to ecclesiastical law;
  - (d) to allow the Society to facilitate the distribution of *The Ecclesiastical Law Journal*, which members are entitled to receive within the terms of their membership of the Society;
  - (e) to facilitate the giving of prizes and awards;
  - (f) we may automatically collect personal data about your equipment, browsing actions and patterns as you interact with our website. We collect this personal data by using cookies, server logs and other similar technologies. We may also receive data about you if you visit other websites employing our cookies. Cookies are pieces of data created when you visit a site, and contain a unique, anonymous number. See our [Cookies](#)

[Policy](#) here for more information. The Society also uses Google analytics: Google utilizes the data collected to track and examine the use of [ecclawsoc.org.uk](http://ecclawsoc.org.uk), to prepare reports on its activities and share them with other Google services. Google may use the data collected to contextualise and personalise the ads of its own advertising network.

### Third party links

5. Our 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 notice of every website you visit.

### The legal basis for our processing of your personal data

6. The legal basis or bases for the Society's processing of personal data for individuals covered by this Privacy Policy is because:
  - (a) such processing is necessary for the performance of a contract, or in order to take steps at your request before entering into the contract. This will apply, for example, in situations where you sign up and pay to become a member of the Society, throughout the duration of your membership, and also when individuals (including non-members) book and pay to attend an event, lecture or conference organised by the Society;
  - (b) it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests. Legitimate interest means the interest of the Society to enable us to give you the best service 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](#); and/or
  - (c) we need to comply with a legal or regulatory obligation. This means processing your personal data where it is necessary for compliance with a legal or regulatory obligation that we are subject to.

### Who the Society may share personal data with

7. The Society shall only share your personal data with the following categories of people/institutions—
  - (a) Cambridge University Press (for the purposes of distributing *The Ecclesiastical Law Journal*);
  - (b) employees of the Society;
  - (c) trustees of the Society;
  - (d) our website provider—*SquareEye*—who host the Society's database and website;
  - (e) *Worldpay* and *Stripe*, who process payments on behalf of the Society;

(f) third parties to whom we may choose to sell, transfer, or merge parts of our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to the Society in this way, then the new owners may use your personal data in the same way as set out in this Privacy Policy.

8. We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

### **Change of purpose**

9. The Society will only use personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please [contact](#) the Administrator.
10. If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.
11. Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.
12. The Society may from time to time amend this Privacy Policy. In this situation we will draw any such amendments to your attention.

### **Data security**

13. The Society has put in place appropriate security measures to prevent personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.
14. The Society has put in place procedures to deal with any suspected personal data breach and will notify relevant individuals and any applicable regulator of a breach where we are legally required to do so.

### **The personal data the Society is going to retain and for how long it is going to retain it**

15. In relation to members, the Society shall retain personal data for the duration of an individual's membership of the Society.
16. When an individual's membership of the Society ends due to non-payment of the annual subscription fee, the Society shall retain that individual's personal data for a further 18 months. This will be to ensure that the Society can fulfill any obligations that it has to provide a copy of *The Ecclesiastical Law Journal* to the individual. An individual can request that we erase their data before this period of 18 months ceases—see below for more information on the right to erasure.
17. In the event that an individual's membership of the Society ends for any other reason apart from non-payment of the annual subscription, any personal data belonging to such an individual will be retained to the extent that it is necessary to justify the reason why their membership was terminated.

18. In relation to non-members of the Society who have provided their personal data in order to sign up to a lecture, conference or other event organised by the Society only, that personal data shall be retained until the lecture, conference or other event has taken place.
19. In relation to members/non-members of the Society who sign up and opt-in to receive communications from the Society, their personal data will be retained until such time as they choose to no longer receive such communications by notifying the Society's Administrator, using the [contact details](#) above.

#### Your rights concerning the way in which the Society processes your personal data

20. You have the following rights relating to the way we process your data:
  - (a) **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.
  - (b) **Request correction of the personal data that we hold about you.** This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.
  - (c) **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 our 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 to erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.
  - (d) **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.
  - (e) **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: (1) if you want us to establish the data's accuracy; (2) where our use of the data is unlawful but you do not want us to erase it; (3) 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; or (4) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.
  - (f) **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.

- (g) **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.

21. The Society shall communicate any rectification, erasure or restriction of the processing of personal data to each person they have shared that personal data with, unless this proves impossible or involves disproportionate effort. The Society shall inform you about the recipients of your personal data if you ask for it.
22. More information about all these rights can be found here: <https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/>

#### **No fee usually required**

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

#### **Time limit to respond**

24. The Society tries to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if a request is particularly complex or a number of requests have been made. In this case, we will notify you and keep you updated.

#### **Complaints**

25. If you are unhappy with the way in which the Society has processed your personal data, you also have the right to make a complaint to the Information Commissioner's Office ("ICO"). You can get in touch with the ICO by calling this number: 0303 123 1113. We would, however, like to have the chance to address your concerns first—so please [contact](#) the Society's Administrator with any questions or complaints you may have in the first instance using the contact details above.

#### **Relevance of providing personal data**

26. It is important to note that, should you choose for whatever reason not to provide the Society with certain personal data you may not be able to become a member of the Society and/or this may mean that the Society cannot send on to you copies of *The Ecclesiastical Law Journal* or facilitate your booking of lectures, conferences or events organised by the Society *etc.*