



# South Western Regional Library Services CIO

## Privacy and Data Protection Policy

Last updated	
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## 1. Introduction

This document outlines South Western Library Services CIO (SWRLS CIO) policy with regard to Privacy and Data Protection and other requirements to comply with the EU General Data Protection Regulations (GDPR) EU 2016/679, which replaces the UK Data Protection Act 1988 (2014 revised) . Under the Regulations, SWRLS CIO is committed to protecting and respecting your privacy. For any ‘personal data’ you provide for the purposes of your membership, the charity is the Data Controller and is responsible for collecting, storing and processing that data in a fair, lawful, secure and transparent way. In addition, this policy document covers requirements under The Freedom of Information Act 2000 and The Computer Misuse Act 1990.

## 2. SWRLS CIO Obligations:

- to individuals of its members, associates, partners, suppliers and service providers to protect the confidentiality, integrity and availability of information assets;
- to ensure business continuity and minimise disruption to business functions by preventing and minimising the impact of privacy and data protection incidents;
- to ensure compliance with relevant information legislation.

## 3. Reason for collecting, storing and processing personal data:

The reason we need to collect, store and process your ‘personal data’ is to be able to administer your membership and provide the membership services you signed up to when you joined the charity. We do this through the creation of a data base of individuals of our members, partners, suppliers and service providers.

The charity previously provided services to members under existing UK Data Protection Laws and members would reasonably expect the charity to have an obligation to continue to provide those services.

## 4. Personal data we process:

The following table explains the types of data we collect and the legal basis, under current legislation, on which that data is processed.

Purpose	Data (key elements)	Basis
Enquiring about our organisation and its work	Name, email, message	<b>Legitimate interest</b> - it is necessary for us to read and store your message so that we can respond in the way you would expect. If the message comes via our website, then this information may be captured by cookies.
Subscribing to email updates about our work, e.g. the SWRLS Newsletter	Name, email	<b>Consent</b> - you have given your active consent.
Signing up as a member	Name, email	<b>Contract</b> - by paying a membership fee, your organisation has entered into a contractual relationship with us as set out in the terms and conditions of our Constitution and Rules.

Booking a training course	Name, email, employer	<b>Legitimate interest</b> - this information is necessary for us to fulfill your intention of attending the course and your expectation to receive all the necessary paperwork.
Applying for a SWRLS Grant	Name, email, employer	<b>Legitimate interest</b> - this information is necessary for us to assess your bid and feedback the results of that assessment.
Website functionality	Website activity collected through cookies	<b>Legitimate interest</b> - it is necessary for us to store a small amount of information, usually through cookies, to deliver functionality that you would expect, such as remembering the contents of an automated message before it is answered.

Definitions of lawful basis:

- **Contractual necessity:** meaning a natural person or data subject is a party in a contract or must take steps in order to enter, at his or her request, and in order to enter into a contract or perform a contract, it is needed and agreed that personal data processing happens within this contractual scope.
- **Legitimate interest:** in that SWRLS CIO and individuals of its members, associates, partners, suppliers and service providers would reasonably expect to provide ‘personal information’ as a requirement of their involvement with SWRLS CIO.
- **Consent:** the data subject has given consent for a personal data processing activity for one or more specific purposes.

**5. How we use your data:**

We will only use your data in a manner that is appropriate considering the basis on which that data was collected, as set out in the table above. For example, we may use your personal information to:

- Reply to enquiries you send us;
- Handle bookings for courses you apply for;
- Where you have agreed, send you general communications about the work of SWRLS and our partners, that we think may be of interest to you.

**6. When we share your data:**

We will only pass your data to third parties in the following circumstances:

- You have provided your explicit consent for us to pass data to a named third party;
- We are using a third party purely for the purposes of processing data on our behalf and we have in place a data processing agreement with that third party that fulfills our legal obligations to the use of third party data processors;
- We are required by law to share your data.

In addition, we will only pass data to third parties outside of the EU where appropriate safeguards are in place as defined by Article 46 of the General data Protection Regulation.

### **7. How long we keep your data:**

We take the principles of data minimisation and removal seriously and have internal policies/procedures in place to ensure we only ask for the minimum amount of data for the associated purpose and delete the data promptly once it is no longer required.

We will hold your personal data on file for as long as your organisation is a member of SWRLS.

Where data is collected on the basis of consent, we will seek renewal of consent at least every three years.

### **8. Rights you have over your data:**

You have a range of rights over your data, which include the following:

- Where data processing is based on consent, you may revoke this consent at any time. We will make as easy as possible for you do this by contacting [director@swrls.org.uk](mailto:director@swrls.org.uk)
- You have the right for rectification and/or deletion of your information;
- You have the right of access to your information;
- You have the right to lodge a complaint with the Information Commissioner if you feel your rights have been infringed.

A full summary of your legal rights over your data can be found on the Information Commissioners website <https://ico.org.uk/>

Please note that relying on some of these rights, such as the right to deleting your data, will make it impossible for us to continue to deliver some or all of our services to you. However, where possible we will always try to allow the maximum access to your rights while continuing to deliver as many services to you as possible.

### **9. Cookies and usage tracking:**

A cookie is a small file of letters and numbers that is downloaded on to your computer when you visit a website. Cookies are used by many websites and can do a number of things e.g. remembering your preferences and counting the number of people looking at a website.

Where cookies are used to collect personal data, we list these purposes in section 1 above. However, we also use some cookies that do not collect personal information, but that do help us collect anonymous information about how people use our website. We use Google Analytics for this purpose. Google Analytics generates statistical and other information about website usage by means of cookies, which are stored on users' computers. The information collected by Google Analytics about usage of our website is not personally identifiable. The data is collected anonymously, stored by Google and used by us to create reports about website usage. Google's privacy policy is available at <https://policies.google.com/> and further information about SWRLS cookies policy can be found at <https://www.swrls.org.uk/cookies-and-privacy.html>

### **10. Modifications:**

We may modify this Privacy and Data Protection Policy from time to time and will publish the most current version on our website. If a modification meaningfully reduces your rights, we will notify people whose personal data we hold and is affected.

If you have any comments or questions about this policy, please contact us at [director@swrls.org.uk](mailto:director@swrls.org.uk)