



THE HONOURABLE SOCIETY OF KNIGHTS OF THE ROUND TABLE PRIVACY POLICY

Addressing the General Data Protection Regulation (GDPR) 2018 [EU]
and
the Data Protection Act (DPA) 2018 [UK]

Updated 19th October 2020

For information on this Policy or to request Subject Access please contact the
Knight Webmaster

Email: knightwebmaster@knightsOftheroundtable.org.uk

This policy covers the following:

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1. Background

The General Data Protection Regulations (GDPR) protects individuals against the misuse of personal data and may cover both manual and electronic records. The Knights of the Round Table Society (“The Society”) take their responsibilities under these regulations seriously and ensure they comply with the requirements.

The United Kingdom (UK) left the European Union (EU) on 31 January 2020. A transition period is now in place until 31 December 2020. During this period the UK must comply with all EU rules and laws. Virtually nothing will change for businesses or for the public. There will be changes after the transition period and any changes in GDPR will then be reflected in this Privacy Policy.

The GDPR / DPA 2018 is enforced in England by the Information Commissioner, operating through the Information Commissioner’s Office (the ‘**ICO**’). The ICO publishes guidance on the DPA and has a broad range of powers, including the ability to issue fines of up to £500,000 for breaches. The ICO will enforce the GDPR when it takes effect in May 2018. Under the GDPR, the ICO will have greater powers, including the ability to issue fines of up to 4% of annual turnover, or €20,000,000, (whichever is greater) and to conduct compulsory audits of organisations’ data handling practices.

The Society has less than 250 members and is registered with The Information Commissioner’s Office (ICO Reference **ZA800816** which is the first step towards showing our commitment towards being legally compliant.

All Society records, whether they be held electronically or physically (paper-based), fall within scope of the Regulations where personal data is accessible according to specific criteria (e.g. alphabetically or chronologically ordered sets of records containing personal data). This means that as The Society holds the names, contact details or other personal information about members, then GDPR applies.

2. Description of the Society's processing activities.

The Society regularly processes the following categories of personal data:

- a. **Knights/Members:** The Society holds the personal data of its past, present and prospective Knights. The personal data held includes Knights' dietary, financial and contact details. The Society processes such personal data in order to administer membership, to organise events such as meetings and social events, and to collect subscription fees. The Society holds some information about its members for archival and historical research purposes, for example, to maintain a roll of past Knights.
- b. **Prospective Knights:** The Society also collects personal data in the Nomination process such as Nationality, Academic and/or Professional Qualifications, National and/or Professional Awards/Honours, current profession and responsibilities, Pastimes, Interests and Notable Achievements, and identifiers such as contact details. The Society processes such personal data for administration purposes and management of the proposed nomination.
- c. **Guests/Spouses:** The Society may enter into correspondence with the guests and/or spouses of the Knights/Members. When it does so the Society may collect incidental personal data such as contact details and dietary preferences and processes such personal data in order to respond to queries and deal with ad hoc issues.
- d. **Beneficiaries/Awardees:** The Society's charitable and educational activities have been a fundamental objective throughout its history. In order to further its charitable and educational aims, the Society may process personal data about beneficiaries and potential beneficiaries, which may include personal, family and financial circumstances, education, and employment history. The Society may process personal data about its beneficiaries for historical and archiving purposes.
- e. **The Public:** The Society may enter into correspondence with members of the public, such as enquirers, correspondents. When it does so the Society may collect incidental personal data such as contact details and personal circumstances and processes such personal data in order to respond to queries and deal with ad hoc issues.
- f. **Suppliers:** The Society processes personal data concerning its suppliers of goods and services, including identifiers such as contact details, financial information and purchase history. The Society processes such information in order to purchase goods and services, to pay its suppliers and to maintain its accounts and records.

3. Key Concepts of Applicable Data Protection Law.

The Data Protection Legislation relies on a number of key definitions, which are explained below.

- a. **Personal Data.** ‘*Personal data*’ means any information relating to an identified or identifiable natural person (a ‘data subject’, which is explained in more detail below). An identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier, or to one or more factors specific to the identity of that natural person.

The Society will hold personal data about its past, present and prospective members, staff and members of the public such as beneficiaries, as well as its suppliers. The Society may hold such personal data both in electronic and hard copy format, in records, correspondence and minutes.

- b. **Processing.** ‘*Processing*’ means any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaption or alteration, retrieval consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction. Processing is interpreted very broadly, so that almost all activities organisations carry out in relation to their personal data are captured by the definition.

The Society understands that it will generally be deemed to be processing any personal data that it may collect, record, store and/or disclose.

- c. **Controller.** ‘*Controller*’ means the natural or legal person, public authority, agency or other body, which determines the purposes and means of the processing of personal data. The Data Protection Legislation applies to controllers, who must comply with its requirements.

The Society will generally be the controller in relation to the personal data of its members, staff, members of the public such as beneficiaries and enquirers, and suppliers. The Knight Remembrancer, supported by the Officers, exercises this control.

- d. **Processor.** ‘*Processor*’ means a natural or legal person, public authority, agency or other body which processes personal data on behalf of the controller. Where a controller uses a processor to process personal data on its behalf, the controller must only use a processor that provides sufficient guarantees to ensure that personal data is processed securely, and in accordance with the requirements of the GDPR.

The Society assigns the Processor role to specific Officials within Chapter as follows: The Knight Remembrancer, Knight Steward and Knight Treasurer

- e. **Special Categories of Personal Data.** ‘*Special categories of personal data*’ means personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, genetic or biometric data, data concerning health (including medical data, and medical records, for example), or concerning an individual’s sex life or sexual orientation. The special categories of personal data require a higher standard of care. If a personal data breach (as defined below) occurs that involves the loss of any of the special categories of personal data, the ICO will regard this as a serious breach.

With the exception of 'dietary requirements', the Society is generally unlikely to hold a significant volume of the special categories of personal data, although it will ensure that all such information is handled accordingly.

- f. **Data Subject.** *'Data subject'* means an individual to whom personal data relates.

Within the Society these will be the Knights/Members, spouses/guests, beneficiaries/awardees, the public, and suppliers.

- g. **Personal Data Breach.** *'Personal data breach'* means a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data. A personal data breach may be accidental, such as a system failure, or loss of an electronic or physical file, or malicious, such as a cyberattack.

In the event that the Society suffers a personal data breach, it will take specific steps, explained below in this policy.

4. Data Protection Principles.

The data protection principles are standards which the Society will observe when processing personal data. These principles are as follows:

- a. **Fairness, Lawfulness and Transparency.** This is the most important of the data protection principles. In more detail:
 - 1) **Fairness:** The Society will not process individuals' personal data in a way that an individual would not have reasonably expected. Collecting personal data on the pretext of one purpose and then using it for another, unrelated purpose is unfair and will not be countenanced. All Society data Processors will consider whether their use of personal data would fall within the reasonable expectations of the affected data subjects.
 - 2) **Transparency:** The Society will provide certain prescribed information to individuals when processing their personal data, including the organisation's identity, the purposes for which personal data are being processed, or are to be processed, and any third party recipients of the personal data. This will take the form Privacy Notices to members, prospective members and guests.
 - 3) **Lawfulness:** The Society will only process data under two of the following lawful grounds, those being **(a) consent and (f) legitimate interest:**
 - a) The data subject has given his or her **consent** to the processing. To be valid, consent must be freely given, informed (by way of the transparency notice, explained above) specific, and capable of withdrawal at any time, without detriment to the data subject. Consent will not be inferred from the absence of an objection.
 - b) *Processing is necessary for the **performance of a contract** to which the data subject is a party, or in order to take steps at the request of the data subject prior to entering a contract.*
 - c) *Processing is necessary for **compliance with a legal obligation** to which the controller is subject.*
 - d) *Processing is necessary in order to protect the **vital interests of the data subject** or of another person.*
 - e) *Processing is necessary for the performance of a task carried out in the **public interest** or in the exercise of official authority vested in the controller.*
 - f) Processing is necessary for the purposes of **legitimate interests** pursued by the controller or by a third party except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require the protection of personal data.

- b. **Purpose Limitation.** This principle requires that the purposes for which personal data are processed are limited to those purposes specified in the transparency information that has been provided to the affected data subjects and not processed for any further incompatible purposes.

The Society will only process personal data it holds for those purposes specified in the website Privacy Notice, or other such transparency notice.

- c. **Data Minimisation.** Personal data will be adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed.

The Society will collect the personal data that is strictly necessary for the purpose for which it was collected, and will not collect additional, unnecessary personal data on a 'just in case' basis.

- d. **Accuracy.** Personal data will be kept accurate, and up to date.

The Society will ensure that any requests from data subjects to update their personal data are dealt with promptly, having satisfied itself as to the requester's identity.

- e. **Storage Limitation.** Personal data will not be kept for longer than is necessary for the purposes for which the data are processed. The duration for which personal data are stored will be dictated by applicable legal, business or other reasons.

If the Society cannot establish a valid legal, business or other reason for retaining personal data, (once again not 'just in case' basis) it will be securely deleted. The Society will specify the periods for which personal data are stored in a record retention policy. After the storage period has expired, personal data should be deleted.

Note that the Society may store some categories of personal data for longer periods where such processing is solely for archiving purposes in the public interest, or historical research purposes. In such cases, the Society must implement appropriate safeguards, such as allowing data subjects to request deletion of some of their personal data.

- f. **Integrity and Confidentiality.** Personal data must be processed in a manner that ensures its security, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures.

The Society takes appropriate measures that are proportionate to the risk associated with the personal data it holds. Such measures may be technical, or organisational or conducting appropriate due diligence on any third parties that process personal data on the Society's behalf and binding them by an appropriate engagement contract.

- g. **Accountability.** Controllers are responsible for compliance with the principles explained above and must be able to demonstrate compliance.

The Society must be in a position of being able to provide evidence of compliance, for example, by way of a data protection policy and documented data protection reviews

5. Our Intent

- a. The Society regards the lawful and correct treatment of personal data as very important to successful working, and to maintaining the confidence of members and of those with whom we deal:
- b. We are committed to safeguarding the privacy of our Members.
The Society will only use the information that we collect about Members lawfully and in accordance with the General Data Protection Regulation (GDPR) and the new Data Protection Act 2018
- c. The Society will adhere to the principles of data protection, as detailed in the Data Protection Act and GDPR.
- d. Specifically, the Regulations require that personal data held must:
 - I. Be processed fairly and lawfully and shall not be processed unless specific conditions are met.
 - II. Be obtained only for one or more of the limited purposes specified in the DPA and GDPR and shall not be processed in any manner incompatible with that purpose or those purposes.
 - III. Be adequate, relevant and not excessive in relation to that/those purpose(s).
 - IV. Be accurate and, where necessary, kept up to date.
 - V. Not be kept for longer than is necessary (subject to archiving requirements).
 - VI. Be processed in accordance with the rights of data subjects under the DPA.
 - VII. Be kept secure by the Data Controller who takes appropriate technical and other measures to prevent unauthorised or unlawful processing or accidental loss or destruction of, or damage to, personal data.
 - VIII. Not be transferred to a country or territory outside the European Economic Area unless that country or territory ensures an adequate level of protection for the rights and freedoms of Individuals/Service Users in relation to the processing of personal data.
- e. This Policy is therefore intended to comply with the Data Protection Act and GDPR but may change over time.

6. Undertaking

In complying with the letter, as well as the spirit, of the law, we will ensure that:

- We take appropriate technical and organisational security measures to safeguard personal data against unlawful or unauthorised processing of personal data and against the accidental loss of, or damage to, personal data.
- ~~Although~~ This policy does not document every part of the Data Protection Legislation which may be relevant but merely focuses on the key aspects that are likely to be applicable to the Society. Should other issues arise in practice not covered by this policy, the Society will consider these separately at the time and will treat people justly and fairly whatever their age, religion, disability, gender, sexual orientation or ethnicity, when dealing with requests for information. The Knight Webmaster will review GDPR annually, reporting on the AGM agenda, and will report during the year at the Chapter meetings.
- We set out clear procedures for responding to requests for information and ensure that we:
 - i. Deal promptly and courteously with any enquiries about handling personal data.
 - ii. Describe clearly how we handle personal data.
 - iii. Regularly review and audit the ways we store, manage and use personal data.
- Any Members ~~or employees~~ processing personal data are appropriately trained and understand that they are responsible for following good data protection practice.
- We regularly assess and evaluate our methods and performance in relation to handling personal data. To mitigate potential risks, the Knight Webmaster will continually review/audit our information and improve our data security and management processes, mapping the data flows on a data map, working closely with the Knight Remembrancer, Knight Steward and Knight Treasurer
- All Members are aware of the implications of a breach of the rules and procedures identified in this policy, and are aware that such a Breach Notification must be reported to the Knight Webmaster immediately or, in his absence, the Knight Remembrancer or any other Officers of the Society.
 - i. The Society keeps a central store of Members' personal data in its membership database.
 - ii. In the event of there being a data breach (data is destroyed or lost, altered or disclosed or if there has been unauthorised access to such data that results in a risk to the rights and freedoms of the individuals involved):
 - the Data Controller undertakes to inform the ICO as well as any relevant authority not later than 72 hours of the Society becoming aware of the breach.
 - and there is a high risk of adversely affecting individuals' rights and freedoms the Data Controller will also inform the individuals themselves, without undue delay.This applies whether the breach is accidental or malicious and can be something as

simple as sending personal data to an incorrect recipient or a computing device containing personal data being lost or stolen.

The Society does not believe that the data it holds give rise to any need to report a breach to the Information Commissioner within 72 hours, but it is conscious of the possible need to do so.

- **Member's Terms & Conditions.** This Policy, the Privacy Statement and Consent forms form part of Terms & Conditions for being a member of the Society. In legal terms, members are "Data Subjects" i.e. "individual Members." However, under this heading, we may also collect personal information regarding their spouse if appropriate (e.g. keeping record of name; displaying on seating plans).
- **Data Protection Officer (DPO).** The DPO assists in monitoring internal compliance, and advising on our data protection obligations, and acts as a contact point for data subjects and the Data Controller. The Knight Webmaster is the DPO for The Society.
- **Data Controller.** The Knights of the Round Table are, from a legal perspective, classed as the 'Data Controller'. The Knight Remembrancer, supported by the Officers, exercises this control. The Knight Webmaster acts as the Knight Remembrancer's representative in managing and processing the Society's data and is the Society's principal Data Processor. Notwithstanding that the Knight Remembrancer and Officers are ultimately responsible for ensuring the safe and correct handling of data and take an active interest in how data is handled, the Knight Webmaster is responsible for:
 - i. Keeping the Officers updated about data protection responsibilities, risks and issues.
 - ii. Reviewing all data protection procedures and policies on a regular basis.
 - iii. Arranging data protection guidance and advice for all Officers and those included in this policy.
 - iv. Answering questions on data protection from Members, ~~Officers~~ ~~Members~~ and other stakeholders.
 - v. Responding to individuals such as Members and Suppliers who wish to know what data is being held on them by The Society.
 - vi. Approving with third parties that handle The Society's data (e.g. ~~such as~~ IT providers, accountants, auditors and caterers), the data processing aspects of contracts or agreements.
 - vii. Ensuring all systems, services, software and equipment meet acceptable security standards.
 - viii. Checking and scanning security hardware/software regularly to ensure proper functioning.
 - ix. Approving data protection statements attached to emails and event notices.
- **Raising Concerns.** The formal mechanism for members to raise concerns regarding the processing of personal data is primarily to email the Knight Webmaster

(knightwebmaster@knightsoftheroundtable.org.uk) or send a letter, by registered mail, to: The Knight Webmaster, 49 Fairfield Gardens, Leigh-on-Sea, Essex SS9 5SD.

- **Requesting Personal Data.** Members can request details of their own personal data held by The Society through a Subject Access Request (SAR). The form for doing so can be obtained from the Knight Webmaster or through the Society's website. *See the SAR template in Appendix A.*
- **Purpose of Processing Personal Data.** We collect personal data primarily to support and advance the aims of the Society and to raise money and support charitable works.
- **Lawful Basis** In data protection law, to share any information, at least one 'lawful basis' is needed. There are six lawful bases available. The Society uses 'Consent' for The Society Members and 'Legitimate Interests' for spouses, guests, beneficiaries, awardees, the public, and suppliers.
 - i. **Lawful Basis of Processing Personal Data by CONSENT.** The lawful basis of processing Members' personal data is very largely by Consent. This is gained where a Member has given explicit clear consent to the processing and holding of their specified personal data for a specific purpose by signing a Consent Form. Once Members have agreed to this Privacy Notice of our Terms & Conditions by signing the Consent Form, Members will be registered for the processing of their personal data, based upon their Consent.
 - ii. **Lawful Basis of Processing Personal Data by LEGITIMATE INTERESTS.** The lawful basis of processing spouses, guests, beneficiaries, awardees, the public, and suppliers' personal data is NOT by Consent. The reasons being that:
 - the processing is not required by law but is of a clear benefit to you or others;
 - there is a limited privacy impact on the individual;
 - the individual should reasonably expect you to use their data in that way; and
 - you cannot, or do not wish to, give the individual full upfront control (i.e. consent) or bother them with disruptive consent requests when they are unlikely to object to the processing.

Spouses/Guests will be sent a Privacy Notice for the transparent processing of their personal data.
- **The information we hold should be accurate and up to date.** The personal information which we hold will be held securely in accordance with our internal data protection and security policies.
 - i. Personal data must be accurate and, where necessary, kept up to date. Inaccurate data must be erased or rectified without delay. Therefore, to ensure that Members stored information are up to date, they will be contacted with a request requesting them to confirm details.

- ii. The type or categories of personal data we will collect about Members is shown on the Consent Form. However, other personal data may be held at any time with the specific agreement of the member. If Members apply for further roles or appointments within the Society, we may request further information and retain additional records, such as interview notes. Equally minutes of meetings and records of decisions may include the name and other information about Members their name and contact details will primarily only be used internally within the Society. However, if Members participate in a dinner or charitable outreach activity, we will normally have to provide their name and possibly other details (e.g. dietary requirements) to other stakeholders.
 - iii. Personal data will only be transferred outside the European Economic Area (EEA) or other European Union (EU) designated areas of adequacy, for specific events. If this is required, consent will be explicitly requested from Members.
 - iv. For certain financial matters (e.g. late payment of membership fees or non-payment for an event Members have attended) the Society reserves the right to contact Members as a legitimate interest.
- **Sensitive Personal Data.** We will never collect sensitive personal data about Members without their explicit consent and a clear explanation as to why it is required.
 - **Spouse Personal Data.** The name of a member's spouse will be held for administrative purposes, unless a specific request to do otherwise is received. Completing an application form with their spouse's/personal guest's name shown indicates that Members have received his or her consent for the name to be held and shown on a seating plan and guest list.
 - **Dietary Requirements.** Where selection of a particular dietary option at events may identify the Member by religion or indicate a health problem, such data is considered high risk. The consent for release of dietary requirements to caterers and to be displayed on place cards is encapsulated in the Consent Form.
 - **Sale or Passing of Personal Data to Third Parties.** We will not sell or pass personal data to any commercial or charitable organisation. Members whose names have traditionally appeared in publications, whether printed or online, will be asked to give their consent for this to continue.
 - **Retention of Personal Data.** We will retain Members' personal data as follows:
 - Names, contact details and relevant Society admission, resignation and death dates are maintained in the database as a historical record of the Society's members.
 - **Information Held Under Consent.** Whilst Members are a member of the Society, upon leaving, we will request their consent to continuing to hold their name and relevant details to support our historical records.

- **Data Subject's Rights.** Under GDPR Members have a number of Rights which we have outlined below:
 - i. **Right of Access.** Members are entitled to access their personal data so that Members are aware of and can verify the lawfulness of the processing. This is achieved through the mechanism of a Subject Access Request (SAR) and Members have the right to obtain:
 - Confirmation that their data is being processed (held).
 - Access to their personal data (a copy).
 - Other supplementary information that corresponds to the information in this Privacy Notice.
 - ii. Under GDPR (from 25 May 2018), this information will be provided without charge, without delay and within one month. If an extension is required or requests are considered manifestly unfounded or excessive, in particular because they are repetitive, the Society may choose to:
 - Charge a reasonable fee taking into account the administrative costs of providing the information.
 - Refuse to respond. The reasons for this will be formally notified to Members and their rights to appeal to the appropriate Supervisory Authority, i.e. UK Information Commissioner's Office (ICO) will be highlighted.
 - iii. **Identify Verification.** To protect their personal data, the Society may seek to verify their identity before releasing any information, which will normally be in electronic format. As a member this will normally be a simple process. However, if the SAR is made from a member living overseas, or former member, or by the relative of a deceased member, then additional verification steps are likely.
 - iv. **Right of Rectification.** Members are entitled to have personal data rectified if it is inaccurate or incomplete. The Society will respond within one month of their request. In the unlikely event the Society does not take action to the request for rectification we will inform Members of their rights to complain or seek judicial remedy.
 - v. **Right of Erasure.** Members may request the deletion or removal of personal data where there is no compelling reason for its continued processing. The Right to Erasure does not provide an absolute 'right to be forgotten'. However, Members do have a right to have personal data erased and to prevent processing in specific circumstances:
 - Where the personal data is no longer necessary in relation to the purpose for which it was originally collected/processed.
 - When Members withdraw consent.
 - When Members object to the processing and there is no overriding legitimate interest for continuing the processing.
 - The personal data was unlawfully processed.
 - The personal data has to be erased in order to comply with a legal obligation.

- The personal data is processed in relation to the offer of information society services to a child, which the Society does not provide.
- vi. **Right to Restrict Processing.** Members have a right to 'block' or suppress processing of personal data. When processing is restricted, the Society is permitted to store the personal data but not further process it. In this event exactly what is held and why will be explained to Members.
- vii. **Right to Data Portability.** Members may request to obtain and reuse their personal data for their own purposes across different services. This allows Members to move, copy or transfer personal data easily from one IT environment to another in a safe and secure way, without hindrance to usability. The Right to Data Portability only applies:
- To personal data Members have provided to the Society.
 - Where the processing is based on their consent or for the performance of a contract.
 - When processing is carried out by automated means. In these circumstances the Society will provide a copy of their data in CSV format and/or PDF free of charge, without undue delay and within one month. If there is a delay to this, Members will be informed.
- viii. **Right to Object.** Members have the right to object to:
- Processing based on legitimate interests or the performance of a task in the public interest/exercise of official authority (including profiling).
 - Direct marketing (including profiling).
 - Processing for purposes of scientific/historical research and statistics.
- The Society does not participate in the second and third activities. However the Society does conduct marketing activities (i.e. 'marketing' Knights of the Round Table and other event opportunities for Members).*
- ix. **Automated Decision Making and Profiling.** The Society does not employ any automated decision-making or conduct profiling of Data Subjects. However, if Members have consented to be held on our Membership database, we may periodically send Members marketing information (e.g. Knight's Event details) so that Members are informed of upcoming events and other opportunities. Elements of these may be automated, but they do not involve automated decision-making or profiling
- x. **Disclosure.** The Society may disclose personal data which it holds to third parties in order to carry out our work. The member will be made aware in most circumstances how and with whom their personal data will be shared. There are circumstances where the law allows the Society to disclose personal data (including sensitive personal data) without the data subject's consent. These are:

- Carrying out a legal duty or as authorised by the Secretary of State.
- Protecting vital interests of an individual/service user or other person.
- The individual user has already made the information public.
- Conducting any legal proceedings, obtaining legal advice or defending any legal rights.
- Monitoring for equal opportunities purposes – i.e. race, disability or religion.
- Providing a confidential service where the individual/service user's consent cannot be obtained or where it is reasonable to proceed without consent.

7. Website Privacy Policy

This privacy policy is for this website: <https://www.knightsoftheroundtable.org.uk/> and is served by The Honourable Society of Knights of the Round Table Knight Webmaster who is contactable via email (knightwebmaster@knightsoftheroundtable.org.uk) or postal address (49 Fairfield Gardens, Leigh-on-Sea, Essex SS9 5SD) and governs the privacy of its users who choose to use it. It explains how we comply with the GDPR (General Data Protection Regulation), and the PECR (Privacy and Electronic Communications Regulations).

This policy will explain areas of this website that may affect your privacy and personal details, how we process, collect, manage and store those details and how your rights under the GDPR, DPA & PECR are adhered to. Additionally, it will explain the use of cookies or software, advertising or commercial sponsorship from third parties and the download of any documents, files or software made available to you (if any) on this website. Further explanations may be provided for specific pages or features of this website in order to help you understand how we, this website and its third parties (if any) interact with you and your computer / device in order to serve it to you. Our contact information is provided if you have any questions.

The DPA & GDPR May 2018

We and this website complies to the Data Protection Act 1998 (DPA) and already complies to the General Data Protection Regulation (GDPR) which came into effect on 25 May 2018. We will update this policy accordingly after the completion of the UK's exit from the European Union.

- **Use of Cookies.**

This website uses cookies to better the users experience while visiting the website. As required by legislation, where applicable this website uses a cookie control system, allowing the user to give explicit permission or to deny the use of /saving of cookies on their computer / device.

- **What are cookies?**

Cookies are small files saved to the user's computers hard drive that track, save and store information about the user's interactions and usage of the website. This allows the website, through its server, to provide the users with a tailored experience within this website.

Users are advised that if they wish to deny the use and saving of cookies from this website on to their computers hard drive they should take necessary steps within their web browsers security settings to block all cookies from this website and its external serving vendors or use the cookie control system, if available, upon their first visit.

- **Downloads & Media Files**

Any downloadable documents, files or media made available on this website are provided to users at their own risk. While all precautions have been undertaken to ensure only genuine downloads are available users are advised to verify their authenticity using third party anti-virus software or similar applications.

We accept no responsibility for third party downloads and downloads provided by external third party websites and advise users to verify their authenticity using third party anti-virus software or similar applications.

- **Contact & Communication With us**

Users contacting us through this website do so at their own discretion and provide any such personal details requested at their own risk. Your personal information is kept private and stored securely until a time it is no longer required or has no use.

- **External Website Links & Third Parties**

Although we only look to include quality, safe and relevant external links, users are advised to adopt a policy of caution before clicking any external web links mentioned throughout this website.

- Shortened URL's; URL shortening is a technique used on the web to shorten URL's (Uniform Resource Locators) to something substantially shorter. This technique is especially used in social media and looks similar to this (example: <http://bit.ly/zyVUBo>). Users should take caution before clicking on shortened URL links and verify their authenticity before proceeding.
- We cannot guarantee or verify the contents of any externally linked website despite our best efforts. Users should therefore note they click on external links at their own risk and we cannot be held liable for any damages or implications caused by visiting any external links mentioned.

8. UK Companies Act 2006 (amended 2007)

In addition to the requirements of the UK Companies Act 1985, every Society has to list its Society registration number, place of registration and registered office address on its website and in an email disclaimer. This is due to an update to the 1985 legislation and came into effect on 1 January 2007.

The need for a UK email disclaimer

As the Society is a private (Charity) Society the Companies Act requires all business emails (and letterhead and order forms) to include the following details in a legible email disclaimer:

Registered name: Honourable Society of Knights of the Round Table

Society registration number:00829635

Place of registration: England

Registered office address:7 Elm Tree Avenue, Esher KT10 8JG

This UK email disclaimer also appears on The Society's website.

NOTE: Failure to comply with these requirements puts a Society at risk of a fine of up to £1,000.

9. Email confidentiality notices

The confidentiality notice is not a legal requirement. However, it is an attempt to say that the content of the email is confidential and that it should not be read by anyone other than the intended recipient.

The following wording would be appropriate below the message text in all official emails from a member representing The Society, as part of their email signature:

***** Email confidentiality notice *****

This message is private and confidential. If you have received this message in error, please notify the sender or the Society and remove it from your system

Do not take it for granted that your confidentiality notice can be relied upon, however much care goes into its preparation.

The value of the notice is that, if the disclosure of the content of an email becomes a subject of dispute, it would be possible to point a court to the existence of the confidentiality notice and argue that the recipient should have known to not disclose the contents of the message.

If the Society decides that it is worth including such a notice, just be aware that it will be in a court's discretion to ignore it.

Updates

Whenever this policy is updated a notice will be sent to Members.

10. Appendix A: - Subject Access Request form

SUBJECT ACCESS REQUEST

Addr1
Addr2
Addr3
Addr4
Post Code

Tel: _____

Date

Dear Sir or Madam,

I am writing to formally make a "Subject Access Request" for a copy of information that you hold about me to which I am entitled under the General Data Protection Regulation 2018.

You can identify my records using the following information:

Full name:

Address:

Addr1
Addr2
Addr3
Addr4
Post Code

Email address:

Please supply the data about me that I am entitled to under Data Protection law including:

- confirmation that you are processing my personal data;
- a copy of my personal data;
- the purposes of your processing;

- the categories of personal data concerned;
- the recipients or categories of recipient you disclose my personal data to;
- your retention period for storing my personal data or, where this is not possible, your criteria for determining how long you will store it;
- confirmation of the existence of my right to request rectification, erasure or restriction or to object to such processing;
- confirmation of my right to lodge a complaint with the Information Commissioner's Office (ICO) or another supervisory authority;
- information about the source of the data, where it was not obtained directly from me;
- the existence of any automated decision-making (including profiling); and
- the safeguards you provide if you transfer my personal data to a third country or international organisation.

If you need any more data from me, or a fee, please let me know as soon as possible. I can be contacted at the phone number and address at the start of this letter.

I look forward to receiving your response to this request for data within one calendar month, per the General Data Protection Regulation. If you do not normally deal with these requests, please pass this letter to your Data Protection Officer, or relevant staff member.

Yours sincerely,

Full Name and Signature

11. THE HONOURABLE SOCIETY OF KNIGHTS OF THE ROUND TABLE PRIVACY POLICY - Sign-off document

Signed

Date

Knight Remembrancer of the Honourable Society of Knights of the Round Table

Signed

Date

Knight Vice-President of the Honourable Society of Knights of the Round Table

Signed

Date

Knight President of the Honourable Society of Knights of the Round Table