
PRIVACY (GDPR), DATA PROTECTION & DATA ACCESS RULES

BACKGROUND:

Essex Yeomanry Association understands that your privacy is important to you and that you care about how your personal data is used and shared online. We respect and value the privacy of everyone who visits our website, essex-yeomanry.org.uk ("Our Site") or transmits information to us. We will only collect and use personal data in ways that are described here, and in a manner that is consistent with Our obligations and your rights under the law.

Please read this Policy carefully and ensure that you understand it. Your acceptance of Our Policy is deemed to occur upon your first use of Our Site or if you contact us to send information. If you do not accept and agree with this Policy, you must stop using Our Site/send information immediately.

1. Definitions and Interpretation

In this Policy the following terms shall have the following meanings:

"Account"	means an account required to access and/or use certain areas and features of Our Site;
"Cookie"	means a small text file placed on your computer or device by Our Site when you visit certain parts of Our Site and/or when you use certain features of Our Site. Details of the Cookies used by Our Site are set out in section 13, below;
"Cookie Law"	means the relevant parts of the Privacy and Electronic Communications (EC Directive) Regulations 2003;
"personal data"	means any and all data that relates to an identifiable person who can be directly or indirectly identified from that data. In this case, it means personal data that you give to Us via Our Site. This definition shall, where applicable, incorporate the definitions provided in the EU Regulation 2016/679 – the General Data Protection Regulation ("GDPR"); and
"We/Us/Our"	means EYA or Essex Yeomanry Association .
"Copyright"	<p>All intellectual property of EYA such as trademarks, trade names, patents, registered designs and any other automatic intellectual property rights derived from the aesthetics or functionality of the Website remain the property of EYA.</p> <p>By using the Website you agree to respect the intellectual property rights of EYA and will refrain from copying, downloading, transmitting, reproducing, printing, or exploiting for commercial purpose any material contained within the Website.</p>

“Data Store”

Data Store is a restricted access resource where official data is protected.

Official users will access the data via a log-on using a Google account and 2 Factor Authentication.

2. Information About Us

- 2.1 Our Site is owned and operated by Essex Yeomanry Association, a charity registered in England under charity number 281638.
- 2.2 Our Data Protection Officer is can be contacted by email from the website, by telephone on 01621 817829, or by post at PO Box 12480 Colchester CO5 1AL.
- 2.3 Our ICO registration is pending.

3. What Does This Policy Cover?

This Policy applies to your use of Our Site and use of information you may obtain from us. Our Site may contain links to other websites. Please note that We have no control over how your data is collected, stored, or used by other websites and We advise you to check the privacy policies of any such websites before providing any data to them.

4. Your Rights

- 4.1 As a data subject, you have the following rights under the GDPR, which this Policy and Our use of personal data have been designed to uphold:
 - 4.1.1 The right to be informed about Our collection and use of personal data;
 - 4.1.2 The right of access to the personal data We hold about you (see section 12);
 - 4.1.3 The right to rectification if any personal data We hold about you is inaccurate or incomplete (please contact Us using the details in section 14);
 - 4.1.4 The right to be forgotten – i.e. the right to ask Us to delete any personal data We hold about you (We only hold your personal data for a limited time, as explained in section 6 but if you would like Us to delete it sooner, please contact Us using the details in section 14);
 - 4.1.5 The right to restrict (i.e. prevent) the processing of your personal data;
 - 4.1.6 The right to data portability (obtaining a copy of your personal data to re-use with another service or organisation);
 - 4.1.7 The right to object to Us using your personal data for particular purposes; and
 - 4.1.8 Rights with respect to automated decision making and profiling.
- 4.2 If you have any cause for complaint about Our use of your personal data, please contact Us using the details provided in section 14 and We will do Our best to solve the problem for you. If We are unable to help, you also have the right to lodge a complaint with the UK’s supervisory authority, the Information

Commissioner's Office.

- 4.3 For further information about your rights, please contact the Information Commissioner's Office or your local Citizens Advice Bureau.

5. **What Data Do We Collect?**

Depending upon your use of Our Site, We may collect some or all of the following personal and non-personal data (please also see section 13 on Our use of Cookies and similar technologies and Our Cookie Policy essex-yeomanry.org.uk/cookies/):

- 5.1 name;
- 5.2 date of birth;
- 5.3 gender;
- 5.4 service information
- 5.5 job title;
- 5.6 rank;
- 5.7 contact information such as email addresses and telephone numbers;
- 5.8 demographic information such as post code, preferences and interests;
- 5.9 IP address;
- 5.10 web browser type and version;
- 5.11 operating system;
- 5.12 a list of URLs starting with a referring site, your activity on Our Site, and the site you exit to;

6. **How Do We Use Your Data?**

- 6.1 All personal data is processed and stored securely, for no longer than is necessary in light of the reason(s) for which it was first collected. We will comply with Our obligations and safeguard your rights under the GDPR at all times. Some information, such as contact information may be held for longer as part of an historical record. Generally, this will be in the form of name, rank and number, unit attached to or serving with. For more details on security see section 7, below.
- 6.2 Our use of your personal data will always have a lawful basis, either because it is necessary for Our performance of an association with you, because you have consented to Our use of your personal data (e.g. by subscribing to emails or our journal), or because it is in Our legitimate historical interests. Specifically, We may use your data for the following purposes:
 - 6.2.1 Providing and managing your Account;
 - 6.2.2 Providing and managing your access to Our Site;
 - 6.2.3 Personalising and tailoring your experience on Our Site;
 - 6.2.4 Supplying Our **Journal** to you (please note that We require your personal data in order to provide this for you);
 - 6.2.5 Personalising and tailoring Our services for you;
 - 6.2.6 Replying to emails from you;

- 6.2.7 Supplying you with emails that you have opted into (you may unsubscribe or opt-out at any time by selecting the unsubscribe button);
 - 6.2.8 Historical research;
 - 6.2.9 Analysing your use of Our Site and gathering feedback to enable Us to continually improve Our Site and your user experience;
- 6.3 With your permission and/or where permitted by law, We may also use your data for marketing purposes which may include contacting you by email, telephone, text message or post with information, news and offers on Our services. We will not, however, send you any unsolicited marketing or spam and will take all reasonable steps to ensure that We fully protect your rights and comply with Our obligations under the GDPR and the Privacy and Electronic Communications (EC Directive) Regulations 2003.
- 6.4 You have the right to withdraw your consent to Us using your personal data at any time, and to request that We delete it. This refers to electronic records, accounts and address information but not to historical information.
- 6.5 We do not keep your personal data for any longer than is necessary in light of the reason(s) for which it was first collected. Data will therefore be retained for the following periods (or its retention will be determined on the following bases):
- 6.5.1 Whilst you have an account with us;
 - 6.5.2 Until you stop using web-based services.

7. How and Where Do We Store Your Data?

- 7.1 We only keep your personal data for as long as We need to in order to use it as described above in section 6, and/or for as long as We have your permission to keep it.
- 7.2 Your data will only be stored in the UK.
- 7.3 Data security is very important to Us, and to protect your data We have taken suitable measures to safeguard and secure data collected through Our Site.
- 7.4 Steps We take to secure and protect your data include:
 - 7.4.1 Limiting access to Association officials.
 - 7.4.2 Using approved services to store data.
 - 7.4.3 Using encrypted connections to web data

8. Do We Share Your Data?

- 8.1 Subject to section 8.2, We will not share any of your data with any third parties for any purposes.
- 8.2 In certain circumstances, We may be legally required to share certain data held by Us, which may include your personal data, for example, where We are involved in legal proceedings, where We are complying with legal obligations, a court order, or a governmental authority.
- 8.3 We may compile statistics about the use of Our Site including data on traffic,

usage patterns, user numbers, sales, and other information. All such data will be anonymised and will not include any personally identifying data, or any anonymised data that can be combined with other data and used to identify you. We may from time to time share such data with third parties such as prospective investors, affiliates, partners, and advertisers. Data will only be shared and used within the bounds of the law.

- 8.4 In certain circumstances, We may be legally required to share certain data held by Us, which may include your personal data, for example, where We are involved in legal proceedings, where We are complying with legal requirements, a court order, or a governmental authority.

9. **What Happens If Our Association rules change**

- 9.1 We are governed by our rules which are published on our website. Changes to the rules require approval at a General Meeting, the date of which is published in our journal each year.

10. **How Can You Control Your Data?**

- 10.1 In addition to your rights under the GDPR, set out in section 4, when you submit personal data via Our Site, you may be given options to restrict Our use of your data. In particular, We aim to give you strong controls on Our use of your data for direct marketing purposes (including the ability to opt-out of receiving emails from Us which you may do by unsubscribing using the links provided in Our emails and at the point of providing your details and by managing your Account).

- 10.2 You may also wish to sign up to one or more of the preference services operating in the UK: The Telephone Preference Service (“the TPS”), the Corporate Telephone Preference Service (“the CTPS”), and the Mailing Preference Service (“the MPS”). These may help to prevent you receiving unsolicited marketing. Please note, however, that these services will not prevent you from receiving marketing communications that you have consented to receiving.

11. **Your Right to Withhold Information**

- 11.1 You may access certain areas of Our Site without providing any data at all. However, to use all features and functions available on Our Site you may be required to submit or allow for the collection of certain data.

- 11.2 You may restrict Our use of Cookies. For more information, see section 13 and Our Cookie Policy.

12. **How Can You Access Your Data?**

You have the right to ask for a copy of any of your personal data held by Us (where such data is held). Under the GDPR, no fee is payable and We will provide any and all information in response to your request free of charge. Please contact Us for more details via the contact form, or using the contact details below in section 14.

13. **Our Use of Cookies**

- 13.1 Our Site may place and access certain first party Cookies on your computer or device. First party Cookies are those placed directly by Us and are used only

by Us. We use Cookies to facilitate and improve your experience of Our Site and to provide and improve Our services. We have carefully chosen these Cookies and have taken steps to ensure that your privacy and personal data is protected and respected at all times.

- 13.2 All Cookies used by and on Our Site are used in accordance with current Cookie Law.
- 13.3 Before Cookies are placed on your computer or device, you will be shown a pop-up requesting your consent to set those Cookies. By giving your consent to the placing of Cookies you are enabling Us to provide the best possible experience and service to you. You may, if you wish, deny consent to the placing of Cookies; however certain features of Our Site may not function fully or as intended.
- 13.4 Certain features of Our Site depend on Cookies to function. Cookie Law deems these Cookies to be “strictly necessary”. These Cookies are shown below in section 13.5. Your consent will not be sought to place these Cookies, but it is still important that you are aware of them. You may still block these Cookies by changing your internet browser’s settings as detailed below in section 13.9, but please be aware that Our Site may not work properly if you do so. We have taken great care to ensure that your privacy is not at risk by allowing them.
- 13.5 The following first party Cookies may be placed on your computer or device:

Name of Cookie	Purpose	Strictly Necessary
[random generated]	PHP session cookie. This expires at the end of the session	Yes
Font Style	General site operation. This expires at the end of the session	Yes

- 13.6 Our Site uses analytics services provided by Google. Website analytics refers to a set of tools used to collect and analyse anonymous usage information, enabling Us to better understand how Our Site is used. This, in turn, enables Us to improve Our Site and the services offered through it. You do not have to allow Us to use these Cookies, however whilst Our use of them does not pose any risk to your privacy or your safe use of Our Site, it does enable Us to continually improve Our Site, making it a better and more useful experience for you.
- 13.7 The analytics service(s) used by Our Site use(s) Cookies to gather the required information.
- 13.8 The analytics service(s) used by Our Site use(s) the following Cookies:

_ga	2 years	Used to distinguish users.
_gid	24 hours	Used to distinguish users.
_gat	1 minute	Used to throttle request

		rate. If Google Analytics is deployed via Google Tag Manager, this cookie will be named <code>_dc_gtm_<property-id></code> .
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<code>__utma</code>	2 years from set/update	Used to distinguish users and sessions. The cookie is created when the javascript library executes and no existing <code>__utma</code> cookies exists. The cookie is updated every time data is sent to Google Analytics.
<code>__utmt</code>	10 minutes	Used to throttle request rate.
<code>__utmb</code>	30 mins from set/update	Used to determine new sessions/visits. The cookie is created when the javascript library executes and no existing <code>__utmb</code> cookies exists. The cookie is updated every time data is sent to Google Analytics.
<code>__utmc</code>	End of browser session	Not used in ga.js. Set for interoperability with urchin.js. Historically, this cookie operated in conjunction with the <code>__utmb</code> cookie to determine whether the user was in a new session/visit.
<code>__utmz</code>	6 months from set/update	Stores the traffic source or campaign that explains how the user reached your site. The cookie is created when the javascript library executes and is updated every time data is sent to Google Analytics.
<code>__utmv</code>	2 years from set/update	Used to store visitor-

		<p>level custom variable data. This cookie is created when a developer uses the <code>_setCustomVar</code> method with a visitor level custom variable. This cookie was also used for the deprecated <code>_setVar</code> method. The cookie is updated every time data is sent to Google Analytics.</p>
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13.9 In addition to the controls that We provide, you can choose to enable or disable Cookies in your internet browser. Most internet browsers also enable you to choose whether you wish to disable all cookies or only third-party cookies. By default, most internet browsers accept Cookies but this can be changed. For further details, please consult the help menu in your internet browser or the documentation that came with your device.

13.10 You can choose to delete Cookies on your computer or device at any time, however you may lose any information that enables you to access Our Site more quickly and efficiently including, but not limited to, login and personalisation settings.

13.11 It is recommended that you keep your Internet browser and operating system up-to-date and that you consult the help and guidance provided by the developer of your internet browser and manufacturer of your computer or device if you are unsure about adjusting your privacy settings.

14. **Contacting Us**

If you have any questions about Our Site or this Privacy Policy, please contact Us by email via the contact form, by telephone on 01621 817829, or by post at PO Box 12480 Colchester CO5 1AL. Please ensure that your query is clear, particularly if it is a request for information about the data We hold about you (as under section 12, above).

15. **Changes to Our Privacy Policy**

We may change this Policy from time to time (for example, if the law changes). Any changes will be immediately posted on Our Site and you will be deemed to have accepted the terms of the Privacy Policy on your first use of Our Site following the alterations. We recommend that you check this page regularly to keep up-to-date.

16. **Official Data**

This policy and data referred to in this note only applies to official data and not to

information held by individual members.

Official data is as follows:

- 16.1 Bank Details are provided to the Treasurer by individuals. Where this information is sent by mail the information is added to the official record and then the letter or note is destroyed
- 16.2 Bank details provided by phone are recorded on the official record and the note, if any, is destroyed
- 16.3 Bank details provided by electronic means can only be sent by encrypted systems. An encrypted mail system is provided for use when required
- 16.4 Membership data is stored in a secure folder on a shared drive. The account is only used for Association business with each folder having unique access. The secure server has password protection. Historic information. Much of the information held by the association is historic and held for research reasons. This information is part of the public record and therefore not the same as personal data. To explain that further, a soldier's army number, unit, service details are distinct from the soldier's home address and phone number. Whilst protection is afforded to personal data and is not publicly searchable, the same will be held as a last known address. Previous addresses and information, unless of historical consequence, will be removed from the record.
- 16.5 Encryption. There are multiple ways to encrypt information. Users of Microsoft, Google and Apple will find information on sending encrypted email by searching online. For the most robust service we use ProtonMail. Users wishing to send encrypted information may make use of this account.

17. **Data Store**

Official data will only be stored in the data store which is managed by the data manager. The data manager is responsible for security and backup. Users will follow the guidance here:

- 17.1 Data access by members. The following guidance applies.
 - 17.1.1 Machines used to access the store data must be fully protected. This includes protection from malware and viruses
 - 17.1.2 Only up-to-date browsers are used. Google Chrome should be used to access the drive
 - 17.1.3 Users will sign out of the drive when work is complete and browser sessions are to be closed.
 - 17.1.4 Public machines are not to be used to access the drive
 - 17.1.5 Shared accounts are not to be used to access the drive
 - 17.1.6 A unique password will be allocated to each user and this must be protected. Where it is required to change the password, only use a unique password
 - 17.1.7 All information and access credentials must be protected at all times
- 17.2 Data manager is given responsibility for the management of data
 - 17.2.1 The data manager is to ensure the account remains secure and in line with current advice on protecting this type of data
 - 17.2.2 The data manager will carry-out a regular security check

17.2.3 Recovery options will be kept up-to-date

17.3 General rules on access to data.

17.3.1 Not all data stored is covered by this policy. The main store contains folders and files which are not covered by this policy, including but not limited to images, journals, notes and articles.

17.3.2 Protected data, membership lists and bank data is only accessible to those who need access. For bank details, only the Treasurer has access and this data is not held in the main store.

17.3.3 Where users require access to other data a link will be provided to a single resource

17.3.4