

The British Club of The Hague (BCH, the Club) is committed to protecting and respecting your privacy. This Privacy Policy sets out how we collect and use your personal information. (This means any information that could identify you.) This document will help you to understand our views and practices regarding your personal data, and how we treat it.

The BCH Privacy Policy may change over time, so please check it periodically. This is Version 1.0, and was compiled on 18 May 2018. If we make any changes to our Privacy Policy, we will detail them on the Club website.

For the purpose of the General Data Protection Regulation (GDPR) 2018, BCH is a data controller and a data processor.

## **1 Terms used in the Privacy Policy**

When we refer to 'you' and 'your' in the Policy, we refer to any individual whose personal information we may process from time to time.

When we refer to 'processing' of your personal information, this includes obtaining, using, recording, and storing the information, as well as anything we do with it, such as organising, adapting or altering it, retrieving or disclosing it, combining it with other data, or erasing it.

## **2 Who are we?**

BCH is a secular, non-political club. Membership is open to anyone with an affinity for British culture. Members meet regularly, and the Club also organises events and activities for Members.

If you have any questions about the BCH Privacy Policy, or how we process your personal information (including any complaints), please contact the Club at *informationbch@gmail.com*, or by post to the Club's registered address: Pastoral Centre, Koningin Marialaan 2, 2595GB Den Haag.

## **3 To whom does this Privacy Policy apply?**

This Policy relates to personal information we may process which pertains to individuals who are:

- visiting or using the BCH website
- making any enquiry to the Club
- applying for membership
- using the Club's information services, including the Club Library
- attending Club events, e.g. registration and booking

## **4 What type of information is collected, and how it is used**

We use your information to ensure that we communicate with you in a way that you accept, including provision of relevant information regarding your membership of BCH; access to our information services; or details about the programme of Club events and activities.

### Personal information

The personal information we collect may include details such as your name, email address, postal address, telephone number (mobile and/or landline), nationality, bank details and debit card details, as well as any information you may provide during communication with the Club. You will have provided this information when applying and paying for membership; accessing Club information services; using the website; registering and paying for an event or activity; or in other ways in which you may engage with the Club.

We will use this information primarily

- to process your BCH membership and/or event or activity payments
- to provide the information services you have requested
- to transmit relevant messages about your membership, or other services that you have requested
- to maintain a record of your relationship with the Club

If you do not provide this information, the Club will not be able to process these actions.

#### Sensitive Personal Information

Data Protection law recognises that some categories of personal information are more sensitive than others. Sensitive Personal Information may include information such as a person's health, race, ethnic origin, political opinions, sex life, sexual orientation, or religious beliefs.

If you provide the Club with any Sensitive Personal Information by telephone, email, or by other means, we will treat that information with additional care and confidentiality, and always in accordance with the Privacy Policy.

If you contact the Club about a specific service, you may choose to provide details of a sensitive nature. We will use this information only for the purposes of dealing with this topic or enquiry.

## **5 How your personal information is collected**

#### Data you provide

Your personal data will include information you provide (or later amend), whether

- from correspondence with you
- verbally to the Club, by phone or in person
- by completing any field or form on the Club website
- by completing any printed form we provide for your use
- by email
- from documents you provide
- from updates to any information you provide from time to time

This includes times when you

- apply for membership
- register for an event or activity
- make an enquiry, whether in person, by phone, through the website, or otherwise
- send us your comments or suggestions
- subscribe to any newsletter or other publication
- request information, including brochures

#### Data generated by BCH

We may generate personal data relating to you, including in connection with

- responding to, and/or dealing with, any enquiry, suggestion, or complaint
- your membership application
- renewal of your membership subscription
- provision of information services
- performing any service, event, or other contract with you
- analysis of your personal data, or data gained from your use of our website

## BCH Website

By visiting and using the Club website, you or your computer may provide personal data. This includes

- information which is automatically provided by your browser to our servers
- information recorded on our web servers about your interaction with our website, and the pages viewed
- information we capture, or place on your computer, or generate using cookies or other technologies on the Club website
- information you input into forms and/or fields on the Club website

## **6 The legal basis for using your information**

In most instances, we will use your personal information only where we have your consent, or because we need to use it in order to fulfil a transaction with you (for example, because you are attending a BCH event). There are other lawful reasons that allow the Club to process your personal information: one of these reasons is known as 'legitimate interests'. This means that the reason we are processing information is because there is a legitimate interest for BCH to process your information, to assist us in management of the Club and its membership.

If we process your personal information under the 'legitimate interests' category, we make sure that we take into account your rights and interests. We will not process your personal information if we consider that either your rights or interests would be adversely affected. Two examples of a 'legitimate interest' to process your personal information are

- if we contact you about your membership
- if we use your personal information to conduct research in order to better understand the Club's membership, e.g. the location of Members across the region

## **7 Marketing**

Where you have consented to this, we may use your personal data to carry out direct marketing, and to send you marketing messages, materials, advertisements and promotions relating to the Club's events programme and/or your BCH membership. You will be free at any time to withdraw your consent to this, or to update your choices, by contacting us as detailed in this Policy, in any direct marketing that you receive, or by responding to a marketing email and asking to be unsubscribed from that marketing list.

## **8 Safety of your information**

The Club is committed to doing what is reasonably possible to keep your personal data secure, and we have put in place appropriate technical and organisational measures against unauthorised or unlawful processing of your personal data - and against accidental loss or destruction of, or damage to, your personal data. We have accordingly implemented security policies, rules and technical measures in order to achieve this.

Unfortunately, the transmission of information *via* internet is not completely secure. Although we do our best to protect your personal information sent to us in this way, we cannot guarantee the security of data transmitted to the Club website or to Club email addresses.

For your own privacy protection, we encourage you to maintain anti-virus and other malware protection software on your computers and other devices, and to maintain your own measures to protect your personal data. Please do not include sensitive personal information in any emails you may send to us. We also encourage you to take care when giving out personal data. Please let us know if someone purports to contact you in the name of the Club, and you have reason to be suspicious.

The Club website may contain links to other sites that may collect personally identifiable information about you. Please be aware that we are not responsible for the content or the privacy practices employed by other sites, and our Privacy Policy does not cover these other websites.

## 9 **Sharing your information**

The personal information we collect will mainly be used by individuals who need to contact Members, e.g.

- Club Secretary
- Membership Secretary
- Treasurer
- Activities Co-ordinators

so that they may be of assistance to you. The Club does not sell or share your personal information with other organisations.

## 10 **For how long is your information held?**

We hold your personal information only as long as is reasonable and necessary for the relevant activity, which may be to fulfil statutory obligations.

## 11 **Your individual rights**

You have a number of rights in respect of the personal information we hold about you. These are detailed below. If you wish to make use of any of these rights, or to make a complaint, you may do so by contacting BCH by email or post.

- Access to your personal information  
You have the right to request access to a copy of the personal information that we hold on you, together with information on what personal information we use, why we use it, who we share it with, how long we keep it for, and whether it has been used for any automated decision-making. You may make such a request free of charge. Please make all requests for access in writing, and provide us with evidence of your identity.
- Right to object  
You may object to our processing of your personal information where we are relying on a legitimate interest, and there is something about your particular situation which prompts you to object to such processing. You also have the right to object where we are processing your personal information for direct marketing purposes. Please contact us as noted above, providing details of your objection.
- Consent  
If you have consented to our use of your personal information (for example, for marketing or for processing your membership), you may withdraw consent at any time.
- Rectification  
You may ask us to change, or complete, any inaccurate, or incomplete, aspects of the personal information held.
- Erasure  
You may ask us to delete your personal information where it is no longer necessary for us to use it, or if you have withdrawn consent, or where we have no lawful basis for keeping it.
- Portability  
You may ask us to provide you, or a third party, in a structured, commonly-used electronic form, with some of the personal information that we hold on you, so that it may be easily transferred.
- Restriction  
You may ask us to restrict the personal information we use about you, where you have asked for it to be erased or where you have objected to our use of it.
- Automated decision-making  
Automated decision-making takes place when an electronic system uses personal information to make a decision without human intervention. You have the right not to be subject to automated decisions that may have a legal implication, or have a similar significant impact on you, unless you have given us your consent, or it is necessary for a contract between you and BCH, or unless it is otherwise permitted by law. You also have certain rights to challenge such decisions. The Club does not currently carry out any automated decision-making.

Please note that some of these rights apply only in certain circumstances, and we may not be able to fulfil every request.

## 12 **Compliance with laws**

We process your personal data in accordance with the following data protection laws:

- The European Union General Data Protection Regulation 2018 (which covers protection of personal data generally)
- The Netherlands AVG (Algemene Verordening Gegevens Bescherming)

The Dutch Data Protection Authority is located in The Hague, at Bezuidenhoutseweg 30.

We may disclose your information if required to so do by law (for example, to comply with applicable laws, regulations and codes or practice, or in response to a valid request from a competent authority), or in order to enforce our Terms and Conditions.

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