



# General Data Protection Regulation

Privacy Notice on behalf of Peterborough Cathedral Old Choristers Association

The purpose of this notice is to deal with the new General Data Protection Regulation which comes into force on the 25<sup>th</sup> of May 2018 and which in ordinary circumstances require every person whose data is held by a third-party to give their physical and positive acquiescence in the use of that data by any such third party.

There is a proviso to the legislation that such positive acquiescence does not need to be given by those members of any organisation where there is a legitimate interest in processing the information.

Applying that to this Association the position would be that a notice to the Association members would be sufficient without there needing to be a positive response from individual members of the Association as to the processing of their information.

The principle of legitimate interest is supported by three tests as follows:

The first is the purpose test as to whether we are pursuing a legitimate interest in using your data. I hope you agree that using your data for the purposes of communicating with you is a legitimate purpose of the Association.

The second test is the necessity test as to whether the processing of the information is necessary for that purpose and once again I hope you agree that it is necessary to process your data for the purpose of communicating with you.

The third test is the balancing test as to whether your individual interests override the legitimate interest in using this information. Our view on advice is that the necessity test is satisfied as long as:

1. The data is restricted to using it for the purpose of communicating with those who are members who have been circulated before the 25<sup>th</sup> of May 2018 with this privacy notice.
2. You are advised of the data controller from time to time. Currently the data controller is Louise Laprun who can be contacted at [l.laprun@srm.com](mailto:l.laprun@srm.com).
3. That the purposes for which the data will be processed is for circulation of information to members.
4. That the data will not be transferred to any other organisation.

5. That subject access requests can be made on application to the Hon. Secretary of the Association.
6. That complaints can be addressed to the Information Commissioner's Office.
7. That you have the right to deletion, restriction or amendment of your data.
8. That the data will be deleted when you cease to be a member.
9. That there are no circumstances in which the data will be transferred out of the European Economic Community (except by the United Kingdom completing Brexit in which case the legislation will be replicated in United Kingdom legislation).
10. That members will have the option at all times requiring their details to be actually deleted or amended without delay.
11. That members' personal data will not be transferred or indirectly made available to sponsors or other third parties without specific informed opt in consent.

On the above basis this is a Privacy Notice in relation to your data to comply with the terms of the General Data Protection Regulation.

If you wish the Association to deal with your data in some other way then please advise.