

PRIVACY POLICY – 15 May 2018

Personal data shall be obtained, maintained, stored, used and passed on only in strict accordance with the Data Protection Act 1998 (UK) and GDPR Regulations 25 May 2018.



Circle of Wine
Writers

Introduction

This is the privacy policy for the Circle of Wine Writers (CWW) which explains our use of personal data in relation to the various services of this not-for-profit membership organisation.

We are committed to protecting your privacy. This policy explains how we use your personal data.

We reserve the right to change this privacy policy from time to time. This privacy policy was last updated on 15 May 2018.

1. Data stored

a. Members - your name, contact details, information about your professional career, photographs and any other particulars you provide are held by the CWW. This information is held on the website www.circleofwinewriters.org, entered into our administrative records and into the official Membership List. All records, including the Membership List, are maintained, stored, used and passed on as electronic records, though we may produce paper records of all or any part of the data.

b. Non-members – your name and contact details relevant to your CWW subscription i.e. Friend of the Circle and Corporate Friend of the Circle are held by the CWW.

2. The CWW Membership List and the data it contains is made available to:

a) other Members (globally) via the members only pages of the website or our Administrator, for personal use only

b) to selected, reputable third parties (globally) including our webmaster, Corporate Friends of the Circle (who pay for this service and who are legitimate trade organisations i.e. generics, trade prs, providers of product or services relevant to the members), mailing houses or providers of benefits for members.

3. Data Processing

a) Members – the processing of your data is necessary for the principal purposes of the CWW and therefore of legitimate interest. However, members are asked to register their acknowledgement of 1a) and 2a) and b) above by email or signing a form and returning it to the Administrator. Applicants and new Members are asked to tick the relevant box via their online application form or a paper alternative (when they will also provide a signature).

b) Non-members – the processing of your data is necessary to communicate about the CWW and therefore of legitimate interest.

Please note, however, that you are in control of any and all information we collect about you and that you may ask for any information to be withheld, or withdraw your consent, at any time and for any reason.

4. The Circle of Wine Writers is the registered Data Controller. Committee members, Webmaster, e-newsletter Editor and Administrator are the sole Data Processors for the Circle of Wine Writers who process the primary data for the following purposes: (a) to maintain the

accuracy of the Membership List; (b) to consider applications from potential new Members; (c) to provide Members with Benefits of Membership, including the Circle Press Card; (d) to advise Members of Circle news; (e) to administer the payment of membership and trade subscriptions.

5. Third parties are granted access to and use of the data on condition that (a) they are GDPR compliant (b) the third party guarantees in respect of security measures applied to safeguard against unauthorized or unlawful processing of the personal data, and (c) the data is used only as necessary to perform their job function.

6. As with any standard email, emails containing your personal data sent between you and the Data Processors, between the Data Processors themselves and to third parties will travel in a non-encrypted format.

7. The Data Processors have a legal obligation to ensure that all personal data is accurate and up-to-date. Members are therefore required to (a) complete an annual Register of Work, and (b) take all reasonable steps to update their details on the website. Non-members should take all reasonable steps to ensure the Administrator has your up-to-date contact details.

8. Any financial information which you supply (for example, credit card or bank account details) is held and processed only by the Honorary Treasurer, the Administrator and Stripe. Stripe is the appointed processor of our online payment system. Credit/debit card details added to the website by members and non-members are not held by the CWW. These are only held securely by Stripe, who are regulated and authorised to the highest level by the card companies (<https://stripe.com/docs/security/stripe>).

9. Any personal data held about you (either in paper form or electronically) is kept secure. Out-of-date information, or when a person ceases to become a member or no longer a customer are archived either online or in printed form. Each year new files are set up by the Administrator.

Subject Access Members and non-members have the right:

- a) to receive on request (a “subject access request”) details of the processing relating to you
- b) to have any inaccurate data corrected or removed
- c) in certain circumstances to stop processing likely to cause “substantial damage or substantial distress”
- d) to prevent your data being used for advertising or marketing

Subject Access Requests should be made in writing to Winifred Bowman, CWW Honorary Secretary email: winbee@syrold.co.za. You will receive a reply within 30 days from receipt of the request. A charge of up to £10 may be levied at the discretion of the Data Controller.

Administrator * – refers to the person appointed to fulfil this function and an assistant who operates from the Administrator’s office.

Members of the Committee (including Officers – Chairman, Hon Secretary, Treasurer) – as recorded by the Administrator * and on the CWW website

Online e-newsletter Editor – as appointed by the Committee **

Webmaster – as appointed by the Committee **

* not a member of the CWW

** may not necessarily be a member of the CWW