

On May 25, 2018, the European Union began enforcing a new set of data protection regulations, known collectively as the <u>GDPR</u> (General Data Protection Regulation). For those of you unfamiliar with the GDPR, the GDPR regulates the collection and storage of personal data for EU residents (including UK residents), regardless of where the organization doing the collecting is located.

It is expected that even if the UK leaves the EU, the principals of GDPR will remain enforce.

What is Personal data

"It includes a) any information relating to an identified individual (i.e. which makes such info personal to that individual), or b) any information relating to someone who could be identified based on a variety of identifiers."

What Personal Data does the Sealed Knot hold?

Our database records include the following personal data:

- Members Name and Contact Details your address
- If supplied, email address and telephone number
- Date of birth
- · Preference for Gift aid
- Stated relationship to any child within a group membership
- If relevant disciplinary outcomes

In addition to personal data, we hold attributes, which are not part of GDPR but are required to manage your membership of the society, such as:

- Membership type
- Membership activity meta data
- Regiment and Army
- Rank and Arm
- Full membership status
- Role within the Sealed Knot
- Appointments, awards

Why does the Sealed Knot hold personal data

The Sealed Knot primarily uses your data to manage your membership of the society and to support security at Sealed Knot events.

This includes:

- Sending Orders of the Day
- Membership management contacting members
- Printing and despatching Membership cards
- Creating gate lists and verifying membership at events



Full member information and notifications

Additionally, with your approval use this data to communicate with you to provide membership and event information

Communications may be sent to you by post or email or other electronic means (for example through social media) depending on the communication preferences you have shared with us.

How we share your data

The Sealed Knot does not share member data for any other purpose than delivery of member services.

Currently the only external party whom data is provided too is for delivery of Orders and company information to full members

The Sealed Knot does NOT sell data to third parties or allow third parties to sell on data where data is shared with them.

How we protect your data

Your data is held securely on the Sealed Knot membership database. The database is accessible to a limited number of authorised Sealed Knot post holders who are required to comply with the Sealed Knot data management policy.

The database and membership system is provided by Wild Apricot a service provider of membership systems to associations, chambers of commerce, non-profits, charities.

Wild Apricot sites are compliant with the EU's <u>Data Protection Directive</u> and are hosted on Amazon Web Services (AWS), which is certified under the <u>Privacy Shield Network</u>, a framework designed by the US Department of Commerce and the European Commission to allow the US companies to host European sites while complying with the EU's data protection requirements.

This service provides us with a managed secure system that is backed up, maintained and supported by a global team 24 hours a day.

The Sealed Knot does not hold any credit/debit card information from member payments, all financial transactions are conducted within our merchant partner (PayPal) certified systems. The Sealed Knot only receive payment notification for our records and processing.

All membership email communication is conducted via the Sealed Knots office365 solution which provides us with secure storage and a centrally managed service.

Paper records relating to membership applications are temporarily stored while processing applications and renewals and then archived for the duration of the membership. Paper records are shredded once the membership has expired.



Locally held regimental records containing personal data are controlled by each regimental CO and adjutant. The use and storage of this data also come under the SK data policy requiring it to only be used for society purposes and stored on protected systems or media. Any local paper records will be destroyed when there need has expired or archived according to the data protection policy.

Your rights relating to the data we hold

The Sealed Knot may contact you by post or email or other electronic means where you have either directly consented or as defined within the Sealed Knot membership terms and condition or as defined within the memorandum and articles of association.

You can amend your personal email contact preference by accessing your online membership record and selecting the 'email subscriptions' in your profile. If you have not registered a personal email address either directly in the online membership system or via the application form, you will not receive any email communications.

If you no longer want to receive communications by post, or email or other electronic means, please contact the data officer via your regimental CO or email to secretary@thesealedknot.org.uk

When contacting us please provide your name and membership number. Please also specify if you wish to unsubscribe from all communications or from specific communication types or channels.

The legal basis for processing your personal data for the purposes as described above is that it is necessary to manage your membership of the Sealed Knot.

You have the right to:

- Ask the Sealed Knot to see, correct or delete the personal data we hold about you
- Object to specific data uses, as described above
- Object to receiving communications
- Ask the Sealed Knot for the transfer of your data electronically to a third party.

Please note that regimental data, rank, arm are not considered personal data.

The Sealed Knot's responsibilities

The Sealed Knot Data Protection Officer (DPO) is responsible for monitoring compliance with relevant legislation in relation to personal data and can be contacted at secretary@thesealedknot.org.uk, you can also contact the DPO if you have any queries or concerns about the Sealed Knot processing of your personal data. Additionally, you ultimately have the right to lodge a complaint with the Information Commissioner's Office at www.ico.org.uk/concerns

Keep your data secure

The Sealed Knot store your data securely, transporting only the minimum data to support membership services.



The Sealed Knot destroy redundant or legacy paper forms once the data becomes redundant

Breach notification

The Sealed Knot will notify members of any data breach which is likely to "result in a risk for the rights and freedoms of individuals", within 72 hours of first having become aware of the breach. Take necessary action to minimise the impact, rectify processes or systems and remove the potential of a re-occurrence.

Data portability

Members have the right to receive their personal data in a portable electronic format that allows them to transfer the data to another organisation.

In general, the Sealed Knot is expected to apply the concept of privacy by design — to incorporate data protection in the design of all data-collecting systems. This includes collecting the minimum amount of data that is absolutely necessary for the completion of the required task (data minimisation), as well as limiting as far as possible access to the data.

This Privacy Notice will be kept under review. Any changes will be updated on our website, membership forms and communicated to you as appropriate. This Privacy Notice was last updated in May 2023.