



THE SEALED KNOT

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Data Protection Policy V2.01

Approved by the board: 5 October 2024

Next review date: November 2027

Version	Date Approved	Description of Changes	Written by	Policy Owner
V1	2017	New policy	Vince Pearce	Company Secretary
V2	June 2024	Updated to align with other SK policy	Cameron North-Bates	Company Secretary
V2.01		IT formatting	Tig Wright and Ross Tooke	Company Secretary

Registered Office: The Sealed Knot Ltd, Burlington House,
Botleigh Grange Business Park, Hedge End, Southampton, SO30 2AF.

Registered in England and Wales No. 1014700

Registered Charity Nos. 263004/SC04072

Data Protection Principles

1. Personal data includes any information relating to an identified or identifiable individual. This includes information relating to someone who could be identified based on a variety of data held by the Sealed Knot. Information relating to a deceased person does not constitute personal data.
2. The Sealed Knot is committed to processing data in accordance with its responsibilities under the Data Protection Act 2018 (DPA). The DPA requires that personal data is:
 - a. Processed lawfully, fairly and in a transparent manner.
 - b. Collected only for specified, explicit and legitimate purposes ("purpose limitation")
 - c. Adequate, relevant and limited to what is necessary in relation to the purposes for which it is processed ("data minimisation")
 - d. Accurate, and where necessary, kept up to date ("accuracy")
 - e. Not kept in a form which permits identification of data subjects for longer than is necessary ("storage limitation")
 - f. Processed in a way which ensures its security, using appropriate technical and organisational measures to protect against unauthorised or unlawful processing, and against accidental loss, destruction or damage ("integrity and confidentiality").
3. The Sealed Knot will ensure that personal data is:
 - a. Not transferred to another country without appropriate safeguards in place and
 - b. Made available to data subjects, who must be allowed to exercise certain rights in relation to their personal data.

General provisions

4. This policy applies to all personal data processed by the Sealed Knot.
5. The Company Secretary, as the Data Protection Officer, shall have responsibility for compliance with this policy and for ensuring review at least annually.

6. The Sealed Knot is registered with the Information Commissioner's Office as an organisation which processes personal data.

Data Subject Rights

7. Individuals have the right to:
- a. Withdraw consent to the processing of their personal data
 - b. Request access to their personal data that the Sealed Knot holds
 - c. Ask the Sealed Knot, via the Company Secretary, to erase any personal data that is no longer necessary to be held
 - d. Ask the Sealed Knot, via the Company Secretary to correct any inaccurate or out-of-date data
 - e. Prevent processing of data that is likely to cause damage or distress to the data subject or to anyone else
 - f. Be notified of a data breach which is likely to result in high risk to their rights and freedoms.

Data held by the Sealed Knot

8. The Sealed Knot records the following categories of personal data:
- a. Members' Name and Contact Details
 - b. Email address and telephone number where supplied
 - c. Date of birth
 - d. Gift aid status
 - e. Stated relationship to any child within a group membership and
 - f. Disciplinary outcomes where relevant.
9. The Sealed Knot also holds the following attributes:
- a. Membership type
 - b. Membership activity including membership length
 - c. Regiment and Army
 - d. Rank and Arm
 - e. Full membership status and

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- f. Role(s) within the Sealed Knot
- g. Tests taken, e.g. sword, musket, artillery, cavalry etc

Data processing

10. The Sealed Knot processes personal data to manage individuals' memberships of the Sealed Knot and to support security for insurance and other purposes at Sealed Knot events.
11. This includes:
 - a. Sending Orders of the Day.
 - b. Contacting members
 - c. Printing and despatching Membership cards
 - d. Creating gate lists and verifying membership at events; and
 - e. Providing Full Members with information and notifications.
12. To manage memberships, the Sealed Knot may contact individuals by post, email, or other electronic means where direct consent has been given, or as defined within the Sealed Knot membership terms and condition, or as defined within the Memorandum and Articles of Association of the Sealed Knot.
13. Individuals can amend their email preferences through their online membership account. Individuals without a registered email address will not receive any email communications.
14. Individuals no longer wishing to receive communications by post, email or other electronic means, may contact the Responsible Data Officer at secretary@thesealedknot.org.uk.

Data sharing

15. The Sealed Knot does not share member data for any other purpose than delivery of member services, including Orders of the Day and providing company information to Full Members.
16. The Sealed Knot does not sell data to third parties or allow third parties to sell on shared data.

Data protection

17. Data is held securely on the Sealed Knot membership database. The database is accessible to a limited number of authorised Sealed

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Knot post holders who are required to comply with the Sealed Knot data management policy.

18. The database and membership system is provided by Wild Apricot: a service provider of membership systems to associations, chambers of commerce, non-profits, and charities.
19. Wild Apricot sites are compliant with the EU's Data Protection Directive and are hosted on Amazon Web Services (AWS), which is certified under the Privacy Shield Network, a framework designed by the US Department of Commerce and the European Commission to allow US companies to host European sites while complying with the EU's data protection requirements.
20. The Sealed Knot does not hold any credit or debit card information from member payments. All financial transactions are conducted within our merchant partner (PayPal) certified systems. The Sealed Knot only receives payment notification for records and processing.
21. All membership email communication is conducted via the Sealed Knots Office365 solution which provides secure storage and a centrally managed service.
22. Any paper records relating to membership applications are temporarily stored while processing applications and renewals. Paper records are shredded once the membership has expired.
23. Locally held regimental records containing personal data are controlled by each regimental Commanding Officer and Adjutant in line with this policy. Personal data in regimental records may only be used for Sealed Knot purposes. It must be stored on protected systems and destroyed when no longer required.

The Sealed Knot's responsibilities

24. The Company Secretary as the Sealed Knot's Data Protection Officer (DPO) is responsible for monitoring compliance with relevant legislation in relation to personal data. They can be contacted at secretary@thesealedknot.org.uk
25. The Sealed Knot will incorporate data protection in the design of all data-collecting systems. This includes collecting the minimum amount of data necessary for the completion of the required task, as well as limiting access to personal data as far as reasonably practicable.

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26. The DPO can be contacted for queries or concerns about the Sealed Knot's processing of personal data. If individuals are unhappy with how their concerns have been addressed, complaints may be raised with the Information Commissioner's Office at www.ico.org.uk/concerns

Breach notification

27. 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.
28. The Sealed Knot will take necessary action to minimise the impact, rectify processes or systems, and remove the potential of a re-occurrence.

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