



Privacy Policy

This Privacy Policy sets out how we, the PESGB, collect, store and use information about you when you use or interact with our main website and dedicated event websites and where we otherwise obtain or collect information about you. This Privacy Policy is effective from 21st July 2020.

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Summary

This section summarises how we obtain, store and use information about you. It is intended to provide a very general overview only. **It is not complete in and of itself and it must be read in conjunction with the corresponding full sections of this Privacy Policy.**

- **Data controller:** PESGB
- **How we collect or obtain information about you:**
 - when you provide it to us (e.g. by contacting us, placing an order on our website, completing a form (for membership or an event) and to sign up to a mailing list.
 - from your use of our website, by using cookies
 - occasionally from third parties.
- **Information we collect:** name, contact details, payment information (eg credit/debit card or your direct debit information), IP address, information from cookies, information about your computer or device (e.g. device and browser type), information about how you use our website (e.g. which pages you have viewed, the time pages were viewed and were most clicked), geographical location from which you accessed our website (based on your IP address), company name or business name, VAT number (if appropriate), information about your degree.
- **How we use your information:** for administrative and business purposes (particularly to contact you and to process orders you place on our website), to process your membership, send you monthly magazines and directories, to use your details in the member directory, to improve our business and website, to advertise our goods and services, to analyse your use of our website and in connection with our legal rights and obligations.
- **Disclosure of your information to third parties:** only to the extent necessary to run our business or fulfil any contracts we enter into with you and where required by law or to enforce our legal rights.
- **PESGB do not sell your information to third parties, and we do not buy information either**
- **How long we retain your information:** for no longer than necessary, taking into account any legal obligations we have (e.g. to maintain records for tax purposes), any other legal basis we have for using your information (e.g. your consent, performance of a contract with you or our legitimate interests as a business). For specific retention periods in relation to certain information which we collect from you, please see the main section below entitled “How long we retain your information”
- **How we secure your information:** using appropriate technical and organisational measures such as storing your information on secure servers, encrypting transfers of data to or from our servers using Secure Sockets Layer (SSL) technology, encrypting payments you make on or via our website using Secure Sockets Layer (SSL) technology, only granting access to your information where necessary and, where necessary password protecting certain information to ensure information cannot be intercepted. All computers owned by the PESGB are password protected, encrypted and can be remote wiped.
- **Use of cookies:** we use cookies on our website. For more information regarding which cookies we use and why, please visit our cookies policy here: <https://www.pesgb.org.uk/cookie-policy/>



- **Transfers of your information outside the European Economic Area:** We only transfer your information outside the European Economic Area if we are required to do so by law or in the needs of our business. We explicitly state in the section below “Transfers of your information outside the European Economic Area” when these business cases arise.
- **Use of automated decision making and profiling:** you are not subject to automated decision making or profiling on our website. However, if you have an account, and so long as you are logged in, the events and news stories presented to you in the My Account area will match those you have declared an interest in. When applying for membership, your information will be profiled by the Membership Manager and this is not an automated process.
- **Your rights in relation to your information**
 - to access your information and to receive information about its use
 - to have your information corrected and/or completed
 - to have your information deleted
 - to restrict the use of your information
 - to receive your information in a portable format
 - to object to the use of your information
 - to withdraw your consent to the use of your information
 - to complain to a supervisory authority
- **Sensitive personal information:** we collect what is commonly referred to as ‘sensitive personal information’ ONLY in certain circumstances, such as in preparation for a Field Trip. For more information, please see the main section below entitled [Sensitive Personal Information](#).



Our details

The data controller in respect of our website is PESGB, charity number: 1085619 of PESGB 3rd Floor, Welby House, 96 Wilton Road, SW1V 1DW.

The Information Asset Owner (IAO) is Maria Iredale, Executive Director.

The Senior Information Rights Owner (SIRO) is Tracey Dancy, Board member and Trustee.

You can contact the data controller by writing to Maria Iredale at the above address or sending an email to pesgb@pesgb.org.uk.

The data protection officer for the data controller is David H Taylor. You can contact the data protection officer by writing to Data Protection Consultancy Limited, 29 Shadwell Lane, Leeds, LS17 6DP or sending an email to david@dataprotectionconsultancy.com.

If you have any questions about this Privacy Policy, please contact the data controller at the above address or sending an email to pesgb@pesgb.org.uk.



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Information we collect when you visit our website

We collect and use information from website visitors in accordance with this section and the section entitled [Disclosure and additional uses of your information](#).

Web server log information

We use a third party server to host our website called Cite Digital Agency, the privacy policy of which is available here: <https://www.cite.co.uk/privacy-cookie-policy/>

Our website server automatically logs the IP address you use to access our website as well as other information about your visit such as the pages accessed, information requested, the date and time of the request, [the source of your access to our website (e.g. the website or URL (link) which referred you to our website), and your browser version and operating system

Our server is located within the European Economic Area (EEA).

Use of website server log information for IT security purposes

Our third party hosting provider collect(s) and store(s) server logs to ensure network and IT security and so that the server and website remain uncompromised. This includes analysing log files to help identify and prevent unauthorised access to our network, the distribution of malicious code, denial of services attacks and other cyber attacks, by detecting unusual or suspicious activity.

Unless we are investigating suspicious or potential criminal activity, we do not make, nor do we allow our hosting provider to make, any attempt to identify you from the information collected via server logs.

Legal basis for processing: compliance with a legal obligation to which we are subject (Article 6(1)(c) of the General Data Protection Regulation).

Legal obligation: we have a legal obligation to implement appropriate technical and organisational measures to ensure a level of security appropriate to the risk of our processing of information about individuals. Recording access to our website using server log files is such a measure.

Legal basis for processing: our and a third party's legitimate interests (Article 6(1)(f) of the General Data Protection Regulation).

Legitimate interests: we and our third party hosting provider have a legitimate interest in using your information for the purposes of ensuring network and information security.

Use of website server log information to analyse website use and improve our website

We use the information collected by our website server logs to analyse how our website users interact with our website and its features. For example, we analyse the number of visits and unique visitors we receive, the time and date of the visit, the location of the visit and the operating system and browser used.

We use the information gathered from the analysis of this information to improve our website. For example, we use the information gathered to change the information, content and structure of our website and individual pages based according to what users are engaging most with and the duration of time spent on particular pages on our website.

Legal basis for processing: our legitimate interests (Article 6(1)(f) of the General Data Protection Regulation).





Legitimate interest: improving our website for our website users and getting to know our website users' preferences so our website can better meet their needs and desires.

Cookies

Cookies are data files which are sent from a website to a browser to record information about users for various purposes.

We use cookies on our website, including essential, functional, analytical and targeting cookies. For further information on how we use cookies, please see our cookies policy which is available here: <https://www.pesgb.org.uk/cookie-policy/>

You can reject some or all of the cookies we use on or via our website by changing your browser settings, but doing so can impair your ability to use our website or some or all of its features. For further information about cookies, including how to change your browser settings, please visit www.allaboutcookies.org or see our cookies policy.



Information we collect when you contact us

We collect and use information from individuals who contact us in accordance with this section and the section entitled [Disclosure and additional uses of your information](#).

Email

When you send an email to the email address displayed on our website we collect your email address and any other information you provide in that email (such as your name, telephone number and the information contained in any signature block in your email).

Legal basis for processing: our legitimate interests (Article 6(1)(f) of the General Data Protection Regulation).

Legitimate interest(s): responding to enquiries and messages we receive and keeping records of correspondence.

Legal basis for processing: necessary to perform a contract or to take steps at your request to enter into a contract (Article 6(1)(b) of the General Data Protection Regulation).

Reason why necessary to perform a contract: where your message relates to us providing you with goods or services or taking steps at your request prior to providing you with our goods and services (for example, providing you with information about such goods and services), we will process your information in order to do so).

Transfer and storage of your information

We use a third party email provider to store emails you send us. Our third party email provider is Office 365, operated by Microsoft and is located in the UK. Their privacy policy is available here: <https://privacy.microsoft.com/en-gb/privacystatement>

Emails you send us will be stored within the European Economic Area on our third party email provider's servers in UK.

Phone

When you contact us by phone, we collect your phone number and any information provide to us during your conversation with us.

We do not record phone calls.

Legal basis for processing: our legitimate interests (Article 6(1)(f) of the General Data Protection Regulation)

Legitimate interest(s): responding to enquiries and messages we receive and keeping records of correspondence.

Legal basis for processing: necessary to perform a contract or to take steps at your request to enter into a contract (Article 6(1)(b) of the General Data Protection Regulation).

Reason why necessary to perform a contract: where your message relates to us providing you with goods or services or taking steps at your request prior to providing you with our goods and services (for example, providing you with information about such goods and services), we will process your information in order to do so).





Post

If you contact us by post, we will collect any information you provide to us in any postal communications you send us.

Legal basis for processing: our legitimate interests (Article 6(1)(f) of the General Data Protection Regulation)

Legitimate interest(s): responding to enquiries and messages we receive and keeping records of correspondence.

Legal basis for processing: necessary to perform a contract or to take steps at your request to enter into a contract (Article 6(1)(b) of the General Data Protection Regulation).

Reason why necessary to perform a contract: where your message relates to us providing you with goods or services or taking steps at your request prior to providing you with our goods and services (for example, providing you with information about such goods and services), we will process your information in order to do so).



Information we collect when you interact with our website

We collect and use information from individuals who interact with particular features of our website in accordance with this section and the section entitled [Disclosure and additional uses of your information](#).

Monthly bulletin or mailing lists

When you sign up for mailing lists on our website by entering your name and email address and subscribing to a mailing list or as a member by updating your profile, we collect your name and email address.

Legal basis for processing: your consent (Article 6(1)(a) of the General Data Protection Regulation).

Consent: you give your consent to us sending you our e-newsletter by signing up to receive it using the steps described above.

Legal basis for processing: necessary to perform a contract (Article 6(1)(b) of the General Data Protection Regulation).

Reason why necessary to perform a contract: Members are sent the monthly bulletin as part of their membership package. Members are able to amend their preferences at any time using the log in section.

Transfer and storage of your information

We use a third party service to send out our monthly bulletin and mailshots and to administer our mailing list, Infusionsoft. Their privacy policy is available here: <https://www.infusionsoft.com/legal/privacy-policy>

InfusionSoft's servers are based in the USA. For further information about the safeguards used when your information is transferred outside the European Economic Area, see the section of this privacy policy below entitled Transfers of your information outside the European Economic Area.

Registering for an account on our website (including membership)

When you register and create an account on our website, we collect the following information: name, address, email address, company details, degree information, finance information and any other information you provide to us when you complete the registration form, such as date of birth, length of time in the industry and gender.

If you do not provide the mandatory information required by the registration form, you will not be able to register or create an account on our website.

You can still register to become a member without an email address but you will not be able to interact with the member only areas of the website if that is the case.

If you do not supply us with the optional information when registering, we may not be able to contact you by phone for matters pertaining to your membership and your directory information will be limited.

Legal basis for processing: necessary to perform a contract (or to take steps at your request prior to entering into a contract) (Article 6(1)(b) of the General Data Protection Regulation).





Reason why necessary to perform a contract: creating an account on our website is necessary to allow you to access the goods and services you have purchased from us.

Transfer and storage of your information

Information you submit to us via the registration form on our website will be stored outside the European Economic Area on InfusionSoft's servers in USA.

For further information about the safeguards used when your information is transferred outside the European Economic Area, see the section of this privacy policy below entitled Transfers of your information outside the European Economic Area.



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Information we collect when you place an order on our website

We collect and use information from individuals who place an order on our website (including event registrations) in accordance with this section and the section entitled [Disclosure and additional uses of your information](#).

Information collected when you place an order

Mandatory information

When you place an order for goods or services on our website, we collect your name, email address, billing address, shipping address, company name (if applicable), VAT number (if applicable).

If you do not provide this information, you will not be able to purchase goods or services from us on our website or enter into a contract with us.

Legal basis for processing: necessary to perform a contract (Article 6(1)(b) of the General Data Protection Regulation).

Reason why necessary to perform a contract: we need the mandatory information collected by our checkout form to establish who the contract is with and to contact you to fulfil our obligations under the contract, including sending you receipts and order confirmations.

Legal basis for processing: compliance with a legal obligation (Article 6(1)(c) of the General Data Protection Regulation).

Legal obligation: we have a legal obligation to issue you with an invoice for the goods and services you purchase from us where you are VAT registered and we require the mandatory information collected by our checkout form for this purpose. We also have a legal obligation to keep accounting records, including records of transactions.

Processing your payment

After you place an order on our website you will need to make payment for the goods or services you have ordered. In order to process your payment we use third party payment processors called Sagepay and GoCardless. Sagepay take card payments and GoCardless take direct debit payments.

Sagepay collects, uses and processes your information, including payment information, in accordance with their privacy policies. You can access its privacy policies via the following link: <https://www.sagepay.co.uk/policies/privacy-policy>.

GoCardless collects, uses and processes your information, including payment information, in accordance with their privacy policies. You can access its privacy policies via the following link: <https://gocardless.com/legal/privacy/>.

Transfer and storage of your information

Sagepay and GoCardless are both located in UK. Information relating to the processing of your payment is stored within the European Economic Area on Sagepay and GoCardless' servers in UK.





Legal basis for processing: necessary to perform a contract (Article 6(1)(b) of the General Data Protection Regulation).

Reason why necessary to perform a contract: to fulfil your contractual obligation to pay for the goods or services you have ordered from us.



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Information collected or obtained from third parties

This section sets out how we obtain or collect information about you from third parties.

Information received from third parties

Generally, we do not receive information about you from third parties. The third parties from which we sometimes receive information about you will include other membership societies with which we have an active MOU, such as AAPG, EAGE, HGS, SEAPEX, SEG and SPE.

It is also possible that third parties with whom we have had no prior contact may provide us with information about you.

Information we obtain from third parties will generally be your name and contact details, but will include any additional information about you which they provide to us.

Legal basis for processing: necessary to perform a contract or to take steps at your request to enter into a contract (Article 6(1)(b) of the General Data Protection Regulation).

Reason why necessary to perform a contract: where a third party has passed on information about you to us (such as your name and email address) in order for us to provide services to you, we will process your information in order to take steps at your request to enter into a contract with you and perform a contract with you (as the case may be).

Legal basis for processing: consent (Article 6(1)(a) of the General Data Protection Regulation).

Consent: where you have asked that a third party to share information about you with us and the purpose of sharing that information is not related to the performance of a contract or services by us to you, we will process your information on the basis of your consent, which you give by asking the third party in question to pass on your information to us.

Legal basis for processing: our legitimate interests (Article 6(1)(f) of the General Data Protection Regulation).

Legitimate interests: where a third party has shared information about you with us and you have not consented to the sharing of that information, we will have a legitimate interest in processing that information in certain circumstances.

For example, we would have a legitimate interest in processing your information to perform our obligations under a sub-contract with the third party, where the third party has the main contract with you. Our legitimate interest is the performance of our obligations under our sub-contract.

Similarly, third parties may pass on information about you to us if you have infringed or potentially infringed any of our legal rights. In this case, we will have a legitimate interest in processing that information to investigate and pursue any such potential infringement.

Where we receive information about you in error

If we receive information about you from a third party in error and/or we do not have a legal basis for processing that information, we will delete your information.

Information obtained by us from third parties

In certain circumstances (for example, to verify the information we hold about you or obtain missing information we require to provide you with a service) we will obtain information about you from certain



publicly accessible sources, both EU and non-EU, such as the electoral register, Companies House, business directories, media publications, social media and websites (including your own website if you have one).

Legal basis for processing: necessary to perform a contract or to take steps at your request to enter into a contract (Article 6(1)(b) of the General Data Protection Regulation).

Reason why necessary to perform a contract: where you have entered into a contract or requested that we enter into a contract with you, in certain circumstances, we will obtain information about you from public sources in order to enable us to understand your business and provide services to you or services to a sufficient standard.

For example, we would obtain and/or verify your email address from your website or from a directory where you ask us to send you information by email but we do not possess the information or we need to confirm that we have recorded your email address correctly.

Legal basis for processing: our legitimate interests (Article 6(1)(f) of the General Data Protection Regulation).

Legitimate interests: in certain circumstances, we will have a legitimate interest in obtaining information about you from public and private sources. For example, if you have infringed or we suspect that you have infringed any of our legal rights, we will have a legitimate interest in obtaining and processing information about you from such sources in order to investigate and pursue any suspected or potential infringement.



Disclosure and additional uses of your information

This section sets out the circumstances in which will disclose information about you to third parties and any additional purposes for which we use your information. PESGB will never sell your data.

Disclosure of your information to service providers

We use a number of third parties to provide us with services which are necessary to run our business or to assist us with running our business, some of whom process your information for us on our behalf. These include the following:

- Telephone provider, Structured Communications. Their privacy policy is available here: https://www.structuredcommunications.co.uk/downloads/SC_Privacy_Policy_21052018.pdf (pdf download)
- Email provider, Office 365 (Microsoft). Their privacy policy is available here: <https://privacy.microsoft.com/en-gb/privacystatement>
- Web developer and hosting provider, Cite Digital Agency. Their privacy policy is available here: <https://www.cite.co.uk/privacy/>
- Membership directory producer, Publishing Events. Their privacy policy is available here: (pdf download on our website)
- Mailing house for distributing membership materials, Colourset Litho Ltd. Their privacy policy is available here: (pdf download on our website).
- CRM and the Membership Database are facilitated by products provided by:
 - Infusionsoft. Their privacy policy is available here: <https://www.infusionsoft.com/legal/privacy-policy>
 - Memberium. Their privacy policy is available here: <https://memberium.com/?s=privacy>
 - Wordpress. Their privacy policy is available here: <https://en-gb.wordpress.org/about/privacy/>

Unless otherwise stated, our third party service providers are located in the European Economic Area.

Your information will be shared with these service providers where necessary to provide you with the service you have requested, whether that is accessing our website or ordering goods and services from us.

When exhibiting at one of our events, your exhibitor contact details will also be shared with other suppliers and the venue you will be exhibiting at. Further details will be included in the terms and conditions of the event you sign up for.

Legal basis for processing: legitimate interests (Article 6(1)(f) of the General Data Protection Regulation).

Legitimate interest relied on: where we share your information with these third parties in a context other than where is necessary to perform a contract (or take steps at your request to do so), we will share your information with such third parties in order to allow us to run and manage our business efficiently.

Legal basis for processing: necessary to perform a contract and/or to take steps at your request prior to entering into a contract (Article 6(1)(b) of the General Data Protection Regulation).

Reason why necessary to perform a contract: we may need to share information with our service providers to enable us to perform our obligations under that contract or to take the steps you have requested before we enter into a contract with you.





Disclosure of your information to other third parties

We disclose your information to other third parties in specific circumstances, as set out below.

Providing information to third parties such as Google Inc.

Google collects information through our use of Google Analytics on our website. Google uses this information, including IP addresses and information from cookies, for a number of purposes, such as improving its Google Analytics service. Information is shared with Google on an aggregated and anonymised basis. To find out more about what information Google collects, how it uses this information and how to control the information sent to Google, please see the following page: <https://www.google.com/policies/privacy/partners/>

Legal basis for processing: our legitimate interests (Article 6(1)(f) of the General Data Protection Regulation).

Legitimate interest(s): meeting our contractual obligations to Google under our Google Analytics Terms of Service (<https://www.google.com/analytics/terms/us.html>)

You can opt out of Google Analytics by installing the browser plugin here: <https://tools.google.com/dlpage/gaoptout>

Transfer and storage of your information

Information collected by Google Analytics is stored outside the European Economic Area on Google's servers in the United States of America.

For further information about the safeguards used when your information is transferred outside the European Economic Area, see the section of this privacy policy below entitled Transfers of your information outside the European Economic Area.

Sharing your information with third parties, related to or associated with the running of our business.

Where it is necessary for us to do so, we sometimes share your data with third parties including our accountants, committee members, field trip leaders, independent contractors, insurers, trustees and other volunteers. Further information on each of these third parties is set out below.

Legal basis for processing: our legitimate interests (Article 6(1)(f) of the General Data Protection Regulation).

Legitimate interest: running and managing our business efficiently.

Accountants

We share information with our accountants for tax purposes. For example, we share invoices we issue and receive with our accountants for the purpose of completing tax returns and our end of year accounts.

Our accountants are Kingston Smith LLP. Their privacy policy is available here: <https://www.kingstonsmith.co.uk/privacy-policy/>





Committee Members

PESGB are served by generous volunteers who offer their time to assist in running training courses, conferences, Special Interest Groups and Regional Groups. Without these individuals, these events and groups simply would not run.

Where necessary, we will share your data with these individuals for the efficient running of these groups.

In these situations, data will be shared for a specific purpose and will be time limited. Individuals concerned will have had training in data protection, have read our data protection policy and have signed a contract, part of which addresses the value of your data.

Field Trip Leaders

PESGB are served by generous volunteers who offer their time to assist in organising, facilitating and running Field Trips. Without these individuals, these events and groups simply would not run.

When you apply for a field trip, you give your consent to share your data with the field trip leader. If you do not consent, you cannot come on to the Field Trip.

This is to ensure the safety and security of attendees at all times. Once the Field Trip has finished, the Leader will destroy their copy of your data.

Independent Contractors

Occasionally we employ independent contractors for a specific purpose. In these situations we may share data with them. In all cases, they will sign a data processing agreement.

Insurers

We will share your information with our insurers where it is necessary to do so, for example in relation to a claim or potential claim we receive or make or under our general disclosure obligations under our insurance contract with them.

We use Churchill Insurance Broker. Their privacy policy is available here:
<http://churchillins.co.uk/privacy-policy/>

Trustees / Council

Members of the PESGB volunteer to become trustees of the charity. Without these individuals, the charity would not be able to operate.

As part of the work of trustees, your data may be shared with them for a specific purpose, or as part of the discussions the trustees have.

In these situations, data will be shared for a specific purpose and will be time limited. Individuals concerned will have had training in data protection, have read our data protection policy and have signed a contract, part of which addresses the value of your data.





Other Volunteers

PESGB are served by generous volunteers who offer their time to assist in working in the PESGB office, volunteering at events and many other things besides.

Where necessary, we will share your data with these individuals for the efficient running of these groups.

In these situations, data will be shared for a specific purpose and will be time limited. Individuals concerned will have had training in data protection, have read our data protection policy and have signed a contract, part of which addresses the value of your data.

PESGB Conferences Ltd

PESGB Conferences Ltd is a subsidiary company of PESGB and data is shared between the two companies for internal administrative purposes, including client, customer, member and employee information.

Legal basis for processing: our legitimate interests (Article 6(1)(f) of the General Data Protection Regulation).

Legitimate interest: running and managing our business effectively.

Disclosure and use of your information for legal reasons

Indicating possible criminal acts or threats to public security to a competent authority

If we suspect that criminal or potential criminal conduct has been occurred, we will in certain circumstances need to contact an appropriate authority, such as the police. This could be the case, for instance, if we suspect that we fraud or a cyber crime has been committed or if we receive threats or malicious communications towards us or third parties.

We will generally only need to process your information for this purpose if you were involved or affected by such an incident in some way.

Legal basis for processing: our legitimate interests (Article 6(1)(f) of the General Data Protection Regulation).

Legitimate interests: preventing crime or suspected criminal activity (such as fraud).

In connection with the enforcement or potential enforcement our legal rights

We will use your information in connection with the enforcement or potential enforcement of our legal rights, including, for example, sharing information with debt collection agencies if you do not pay amounts owed to us when you are contractually obliged to do so. Our legal rights may be contractual (where we have entered into a contract with you) or non-contractual (such as legal rights that we have under copyright law or tort law).

Legal basis for processing: our legitimate interests (Article 6(1)(f) of the General Data Protection Regulation).

Legitimate interest: enforcing our legal rights and taking steps to enforce our legal rights.





In connection with a legal or potential legal dispute or proceedings

We may need to use your information if we are involved in a dispute with you or a third party for example, either to resolve the dispute or as part of any mediation, arbitration or court resolution or similar process.

Legal basis for processing: our legitimate interests (Article 6(1)(f) of the General Data Protection Regulation).

Legitimate interest(s): resolving disputes and potential disputes.

For ongoing compliance with laws, regulations and other legal requirements

We will use and process your information in order to comply with legal obligations to which we are subject. For example, we may need to disclose your information pursuant to a court order or subpoena if we receive one.

Legal basis for processing: compliance with a legal obligation (Article 6(1)(c) of the General Data Protection Regulation).

Legal obligation(s): legal obligations to disclose information which are part of the laws of England and Wales or if they have been integrated into the United Kingdom's legal framework (for example in the form of an international agreement which the United Kingdom has signed).

Legal basis for processing: our legitimate interests (Article 6(1)(f) of the General Data Protection Regulation).

Legitimate interest: where the legal obligations are part of the laws of another country and have not been integrated into the United Kingdom's legal framework, we have a legitimate interest in complying with these obligations.



How long we retain your information

This section sets out how long we retain your information. We have set out specific retention periods where possible. Where that has not been possible, we have set out the criteria we use to determine the retention period.

Retention periods

Order information: when you place an order for goods and services - including membership and events - we retain that information for six years following the end of the financial year in which you placed your order, in accordance with our legal obligation to keep records for tax purposes. To avoid administrative burdens on the PESGB, we will therefore keep membership records and event attendee information for the same amount of time after a member has lapsed or an attendee no longer engages with the society.

Correspondence and enquiries: when you make an enquiry or correspond with us for any reason, whether by email or by phone, we will retain your information for as long as it takes to respond to and resolve your enquiry, and for a further six months after which point we will delete your information.

Mailing Lists: if you consent to receive information from the PESGB on certain events, we retain the information you used to sign up for that mailing list so long as you remain subscribed (i.e. you do not unsubscribe) or if we decide to cancel that mailing list service, whichever comes earlier.

Membership data: So long as you remain a member of the PESGB, we will keep your full membership details on record.

Members who have Lapsed: Once a member lapses, we retain your data for six years unless otherwise requested. We have three reasons for this. Firstly membership is a financial transaction and we are required by law to retain details of these transactions for 6 years. Secondly it saves the PESGB having to part delete a membership record when a member lapses. Finally it provides members who are lapsing because they are moving overseas an opportunity to return and renew their membership rather than “start again”.

Event attendees: We retain your details for the duration of the event you attend and for six years afterwards. This is because events tickets include a financial transaction for which we are required to keep details of.

Criteria for determining retention periods

In any other circumstances, we will retain your information for no longer than necessary, taking into account the following:

- the purpose(s) and use of your information both now and in the future (such as whether it is necessary to continue to store that information in order to continue to perform our obligations under a contract with you or to contact you in the future);
- whether we have any legal obligation to continue to process your information (such as any record-keeping obligations imposed by relevant law or regulation);
- whether we have any legal basis to continue to process your information (such as your consent);
- how valuable your information is (both now and in the future);
- any relevant agreed industry practices on how long information should be retained;
- the levels of risk, cost and liability involved with us continuing to hold the information;
- how hard it is to ensure that the information can be kept up to date and accurate; and





- any relevant surrounding circumstances (such as the nature and status of our relationship with you).



How we secure your information

We take appropriate technical and organisational measures to secure your information and to protect it against unauthorised or unlawful use and accidental loss or destruction, including:

- only sharing and providing access to your information to the minimum extent necessary, subject to confidentiality restrictions where appropriate, and on an anonymised basis wherever possible;
- using secure servers to store your information
- verifying the identity of any individual who requests access to information prior to granting them access to information;
- using Secure Sockets Layer (SSL) software to encrypt any information you submit to us via any forms on our website and any payment transactions you make on or via our website
- only transferring your information via closed system or encrypted data transfers

Transmission of information to us by email

Transmission of information over the internet is not entirely secure, and if you submit any information to us over the internet (whether by email, via our website or any other means), you do so entirely at your own risk.

We cannot be responsible for any costs, expenses, loss of profits, harm to reputation, damages, liabilities or any other form of loss or damage suffered by you as a result of your decision to transmit information to us by such means.



Transfers of your information outside the European Economic Area

Your information will be transferred and stored outside the European Economic Area (EEA) in the circumstances set out below. We will also transfer your information outside the EEA or to an international organisation in order to comply with legal obligations to which we are subject (compliance with a court order, for example). Where we are required to do so, we will ensure appropriate safeguards and protections are in place.

CRM & Membership Database

Information you submit to us is stored in our CRM whose supplier is Infusionsoft. You can access their privacy policy here: <https://www.infusionsoft.com/legal/privacy-policy>.

Country of storage: USA. This country is not subject to an adequacy decision by the European Commission.

Safeguard(s) used: Infusionsoft has self-certified its compliance with the EU-U.S. Privacy Shield. The EU-U.S. Privacy Shield is an approved certification mechanism under Article 42 of the General Data Protection Regulation, which is permitted under Article 46(2)(f) of the General Data Protection Regulation. You can access the European Commission decision on the adequacy of the EU-U.S. Privacy Shield here: http://ec.europa.eu/justice/data-protection/international-transfers/adequacy/index_en.htm

File Storage

We store files on Dropbox. You can access their privacy policy here: <https://www.dropbox.com/privacy>.

Country of storage: USA. This country is not subject to an adequacy decision by the European Commission.

Safeguard(s) used: Infusionsoft has self-certified its compliance with the EU-U.S. Privacy Shield. The EU-U.S. Privacy Shield is an approved certification mechanism under Article 42 of the General Data Protection Regulation, which is permitted under Article 46(2)(f) of the General Data Protection Regulation. You can access the European Commission decision on the adequacy of the EU-U.S. Privacy Shield here: http://ec.europa.eu/justice/data-protection/international-transfers/adequacy/index_en.htm

Google Analytics

Information collected by Google Analytics (your IP address and actions you take in relation to our website) is transferred outside the EEA and stored on Google's servers. You can access Google's privacy policy here: <https://www.google.com/policies/privacy/>

Country of storage: USA. This country is not subject to an adequacy decision by the European Commission.

Safeguard(s) used: Google has self-certified its compliance with the EU-U.S. Privacy Shield which is available here: <https://www.privacyshield.gov/welcome>. The EU-U.S. Privacy Shield is an approved certification mechanism under Article 42 of the General Data Protection Regulation, which is permitted under Article 46(2)(f) of the General Data Protection Regulation. You can access the European





Commission decision on the adequacy of the EU-U.S. Privacy Shield here: http://ec.europa.eu/justice/data-protection/international-transfers/adequacy/index_en.htm

Connection between website and CRM

Information collected by the website to be saved into our CRM passes through Memberium. You can access Memberium's privacy policy here: <https://memberium.com/?s=privacy>

Country of storage: USA. This country is not subject to an adequacy decision by the European Commission.

Safeguard(s) used: Memberium has self-certified its compliance with the EU-U.S. Privacy Shield which is available here: <https://www.privacyshield.gov/welcome>. The EU-U.S. Privacy Shield is an approved certification mechanism under Article 42 of the General Data Protection Regulation, which is permitted under Article 46(2)(f) of the General Data Protection Regulation. You can access the European Commission decision on the adequacy of the EU-U.S. Privacy Shield here: http://ec.europa.eu/justice/data-protection/international-transfers/adequacy/index_en.htm



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Your rights in relation to your information

Subject to certain limitations on certain rights, you have the following rights in relation to your information, which you can exercise by writing to PESGB 3rd Floor, Welby House, 96 Wilton Road, SW1V 1DW or sending an email to the Data Controller at pesgb@pesgb.org.uk.

- **to request access to your information** and information related to our use and processing of your information;
- **to request the correction or deletion** of your information;
- **to request that we restrict our use** of your information;
- **to receive information which you have provided to us in a structured, commonly used and machine-readable format** (e.g. a CSV file) and the right to have that information transferred to another data controller (including a third party data controller);
- **to object to the processing of your information for certain purposes** (for further information, see the section below entitled Your right to object to the processing of your information for certain purposes); and
- **to withdraw your consent to our use of your information** at any time where we rely on your consent to use or process that information. Please note that if you withdraw your consent, this will not affect the lawfulness of our use and processing of your information on the basis of your consent before the point in time when you withdraw your consent.

In accordance with Article 77 of the General Data Protection Regulation, you also have the right to lodge a complaint with a supervisory authority, in particular in the Member State of your habitual residence, place of work or of an alleged infringement of the General Data Protection Regulation.

For the purposes of the UK, the supervisory authority is the Information Commissioner's Office (ICO), the contact details of which are available here: <https://ico.org.uk/global/contact-us/>

Further information on your rights in relation to your personal data as an individual

The above rights are provided in summary form only and certain limitations apply to many of these rights. For further information about your rights in relation to your information, including any limitations which apply, please visit the following pages on the ICO's website:

- <https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/>; and
- <https://ico.org.uk/for-the-public/is-my-information-being-handled-correctly/>

You can also find out further information about your rights, as well as information on any limitations which apply to those rights, by reading the underlying legislation contained in Articles 12 to 22 and 34 of the General Data Protection Regulation, which is available here: http://ec.europa.eu/justice/data-protection/reform/files/regulation_oj_en.pdf

Verifying your identity where you request access to your information

Where you request access to your information, we are required by law to use all reasonable measures to verify your identity before doing so.

These measures are designed to protect your information and to reduce the risk of identity fraud, identity theft or general unauthorised access to your information.





How we verify your identity

Where we possess appropriate information about you on file, we will attempt to verify your identity using that information.

If it is not possible to identify you from such information, or if we have insufficient information about you, we may require original or certified copies of certain documentation in order to be able to verify your identity before we are able to provide you with access to your information.

We will be able to confirm the precise information we require to verify your identity in your specific circumstances if and when you make such a request.



Your right to object to the processing of your information for certain purposes

You have the following rights in relation to your information, which you may exercise in the same way as you may exercise by writing to PESGB 3rd Floor, Welby House, 96 Wilton Road, SW1V 1DW.or sending an email to pesgb@pesgb.org.uk.

- to object to us using or processing your information where we use or process it in order to **carry out a task in the public interest or for our legitimate interests**, including 'profiling' (i.e. analysing or predicting your behaviour based on your information) based on any of these purposes; and
- to object to us using or processing your information for **direct marketing purposes** (including any profiling we engage in that is related to such direct marketing).

You may also exercise your right to object to us using or processing your information for direct marketing purposes by:

- **clicking the unsubscribe link** contained at the bottom of any marketing email we send to you and following the instructions which appear in your browser following your clicking on that link;
- **sending an email** to pesgb@pesgb.org.uk, asking that we stop sending you marketing communications or by including the words "OPT OUT".

For more information on how to object to our use of information collected from cookies and similar technologies, please see the section entitled How to accept or reject cookies in our cookies policy, which is available here: <https://www.pesgb.org.uk/cookie-policy/>



Sensitive Personal Information

'Sensitive personal information' is information about an individual that reveals their racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, genetic information, biometric information for the purpose of uniquely identifying an individual, information concerning health or information concerning a natural person's sex life or sexual orientation.

We only collect relevant medical data when a member signs up for a field trip. In these instances, your data is shared only between the organiser of the field trip and the first aid representative onsite. It is used for no other purpose, is shared using password protected spreadsheets and is deleted after its use. Attendees give this information voluntarily and we ask for it to ensure the safety of all our attendees at a Field Trip.



What we do if there is a breach

The ICO defines a personal data breach as a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data. This includes breaches that are the result of both accidental and deliberate causes. This also means that a breach is more than just about losing personal data.

Recording a breach

In accordance with guidance from the ICO (<https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/personal-data-breaches/>) we will keep a record of any personal data breaches.

Procedure and timing

Should a breach occur, our Senior Information Rights Owner (SIRO) will investigate the likelihood and severity of any risk to people's rights and freedoms. If there is a risk, we will notify the ICO; if it's unlikely then we may choose not to report it in accordance with guidance offered by ICO.

If the breach is likely to result in a high risk of adversely affecting individuals' rights and freedoms, we will also notify those individuals as soon as possible.

All breaches that need to be reported will be reported to the ICO within 72 hours.

Should we need to notify affected individuals, this will take place as soon as possible after reporting to the ICO.



Changes to our Privacy Policy

We update and amend our Privacy Policy from time to time.

Minor changes to our Privacy Policy

Where we make minor changes to our Privacy Policy, we will update our Privacy Policy with a new effective date stated at the beginning of it. Our processing of your information will be governed by the practices set out in that new version of the Privacy Policy from its effective date onwards.

Major changes to our Privacy Policy or the purposes for which we process your information

Where we make major changes to our Privacy Policy or intend to use your information for a new purpose or a different purpose than the purposes for which we originally collected it, we will notify you by email (where possible) or by posting a notice on our website.

We will provide you with the information about the change in question and the purpose and any other relevant information before we use your information for that new purpose.

Wherever required, we will obtain your prior consent before using your information for a purpose that is different from the purposes for which we originally collected it.



Children's Privacy

Because we care about the safety and privacy of children online, we comply with the Children's Online Privacy Protection Act of 1998 (COPPA). COPPA and its accompanying regulations protect the privacy of children using the internet.

Some of our events are appropriate for school aged children to attend, and in those situations we encourage the school, parents or guardians to register the children for the event on their behalf. We do not market directly to these children.

We sometimes have children of attendees coming to our events. In those situations we treat those individuals as a "plus one" and do not record personal details.

Beyond those two circumstances, we do not knowingly contact or collect information from persons under the age of 18. The website is not intended to solicit information of any kind from persons under the age of 18.

It is also possible that we could receive information pertaining to persons under the age of 18 by the fraud or deception of a third party. If we are notified of this, as soon as we verify the information, we will, where required by law to do so, immediately obtain the appropriate parental consent to use that information or, if we are unable to obtain such parental consent, we will delete the information from our servers. If you would like to notify us of our receipt of information about persons under the age of 18, please do so by sending an email to pesgb@pesgb.org.uk.



California Do Not Track Disclosures

"Do Not Track" is a privacy preference that users can set in their web browsers. When a user turns on a Do Not Track signal in their browser, the browser sends a message to websites requesting that they do not track the user. For information about Do Not Track, please visit www.allaboutdnt.org

At this time, we do not respond to Do Not Track browser settings or signals. For information on how to opt out from tracking technologies used on our website, see our cookies policy which is available here: <https://www.pesgb.org.uk/cookie-policy/>



Copyright, credit and logo

This Privacy Policy is based on a General Data Protection Regulation (Regulation (EU) 2016/769) (GDPR) compliant template provided by GDPR Privacy Policy. For further information, please visit <https://gdprprivacypolicy.org>

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