

# **Merton Park Ward Residents Association and Merton Park Independent Residents**

## **General Data Protection Regulation 2018**

### **Privacy Policy**

#### **Personal Data**

Personal Data is information that could be used to identify a living individual (including name, address, phone number, email address, photographs, videos). The processing of personal data is governed by the General Data Protection Regulation 2018 (GDPR).

#### **Merton Park Ward Residents Association (MPWRA) and Merton Park Independent Residents (MPWIR)**

MPWRA is the residents association for Merton Park Ward and supports the activities of the Ward's Independent Residents councillors who operate under the banner of our sister organisation MPWIR. MPWRA provides:

- monthly meetings, open to all, where the Independent Residents councillors attend, listen and speak;
- our regular Newsletter "Forum" delivered to every door in the Ward;
- frequent Email Alerts upon request;
- funding for MPWIR candidates at election time.

Data is required for the purpose of maintaining the membership records and communication generally, and including notice of MPWRA Annual General Meetings and, at election time, notice of MPWIR Special General Meeting to select candidates.

#### **What data do we process?**

MPWRA will process some or all of the following where necessary:

- names, titles and aliases;
- contact details such as telephone numbers, addresses and Email addresses;
- photographs and videos;
- where you have offered help or the benefit of a specific skill this may be recorded;
- when you pay subscriptions or where you make donations to us, or payments are made in or out of our bank account, we may become temporarily aware of financial identifiers such as bank account numbers, payment card numbers, payment/transaction identifiers, policy numbers, and claim numbers. We do not maintain records of these;

### **How do we process your personal data?**

We will comply with our legal obligations to keep personal data up to date; to store and destroy it securely; not to collect or retain excessive amounts of data; to keep personal data secure, and to protect it from loss, misuse, unauthorised access and disclosure; and to ensure that appropriate technical measures are in place to protect personal data.

We use your personal data for some or all of the following purposes:

- to support our Independent Residents Councillors in representing the people of Merton Park Ward in the Council proceedings and functions of the London borough of Merton.
- to promote the appropriate interests of the local community including preservation of Merton Park's cultural and architectural heritage and open spaces;
- to enable us to meet all legal and statutory obligations;
- to administer membership records;
- to maintain our own accounts and records;
- to raise funds. Fund raising activities include our "100 Club" which is open to MPWRA members only;
- to process any donation that you have made;
- to seek your views or comments;
- to notify you of changes to our services, events and role holders;
- to send you communications, including email alerts, which you have requested or that may be of interest to you, which may include information about campaigns, appeals, or fundraising activities;
- in the course of paying or receiving money we may come into contact with bank account details but these are not recorded.
- to enable us to meet all legal and statutory obligations;
- to carry out comprehensive safeguarding procedures (including due diligence and complaints handling) in accordance with best safeguarding practice from time to time with the aim of ensuring that all children and adults at risk are provided with safe environments.

### **The legal basis for processing your personal data**

If you are a member of MPWRA you pay us a subscription and that constitutes a contract with you. We keep your data to enable us to maintain the membership records and to communicate with you.

If you are a volunteer, committee member, or officer of MPWRA/MPWIR or an MPWIR Councillor we will have asked for your email address, phone number and email address and in giving this you will have consented to these items being recorded.

If you are a member of our "100 Club", which is open to MPWRA members only, again you pay a subscription that constitutes a contract with you. We keep your data to enable us to maintain the membership records and to communicate with you.

If you have requested MPWRA Email Alerts you will have supplied your email address for the purpose and have thereby opted-in specifically to this service, whether you are a member of MPWRA or not. It is in the legitimate interest of recipients to be told of forthcoming events and the issues affecting the Ward and its surroundings, as well as progress with the issues. It is in the

legitimate interest of MPWRA and its MPWIR Councillors to keep recipients informed. In relation to Email Alerts, the only data we record is your Email address.

### **Sharing your personal data**

Your personal data will be treated as strictly confidential. MPWRA shares information with MPWIR. Otherwise, information will only be shared with third parties where it is necessary for the performance of our tasks or where you first give us your prior consent. For processing Email Alerts, it is necessary to share recipients' email address with Mailchimp who process Email Alerts.

### **How long do we keep your personal data?**

We will keep some records permanently if we are legally required to do so. We may keep some other records for an extended period of time. For example, it is current best practice to keep financial records for a minimum period of 7 years to support HMRC audits or, for MPWIR, Electoral Commission requirements. In general, we will endeavour to keep data only for as long as we need it. This means that we may delete it when it is no longer needed, for instance if you cancel your membership.

### **Your rights and your personal data**

You have the following rights with respect to your personal data:

- The right to access information we hold on you - At any point you can contact us to request the information we hold on you, as well as why we have that information, who has access to it and where we obtained it from. Once we have received your request we will respond within one month. There are no fees or charges for the first request but additional requests for the same data may be subject to an administrative fee.
- The right to correct and update the information we hold on you - If the data we hold on you is out of date, incomplete or incorrect, you can inform us and your data will be updated.
- The right to have your information erased - If you feel that we should no longer be using your data or that we are illegally using your data, you can request that we erase the data we hold. When we receive your request we will confirm whether the data has been deleted or the reason why it cannot be deleted (for example because we need it for our legitimate interests or regulatory purpose(s)).
- The right to object to processing of your data - You have the right to request that we stop processing your data. Upon receiving the request we will contact you and let you know if we are able to comply or if we have legitimate grounds to continue to process your data. Even after you exercise your right to object, we may continue to hold your data to comply with your other rights or to bring or defend legal claims.
- The right to data portability - You have the right to request that we transfer some of your data to another controller. We will comply with your request, where it is feasible to do so, within one month of receiving your request.
- The right at any time to withdraw your consent to the processing of data to which consent was sought (see contact details below).
- The right to lodge a complaint with the Information Commissioner's Office.

When exercising any of the rights listed above, in order to process your request, we may need to verify your identity for your security. In such cases we will need you to respond with proof of your identity before you can exercise these rights.

### **Transfer of data abroad**

Any electronic personal data transferred to countries or territories outside the EEA will only be placed on systems complying with measures giving equivalent protection of personal rights either through international agreements or contracts approved by the European Union. Our website is also accessible from overseas so on occasion some personal data (for example in a newsletter) may be accessed from overseas.

### **Further processing**

If we wish to use your personal data for a new purpose, not covered by this notice, then we will provide you with a new notice explaining this new use prior to commencing the processing and setting out the relevant purposes and processing conditions. Where and whenever necessary, we will seek your prior consent to the new processing.

### **Our website**

When you use our website, we use tools like Google Analytics to collect information such as your IP address, the browser you use (e.g. Google Chrome, Firefox etc.), domain names, the time of day you accessed the website and referring website addresses. This information helps improve our online services, ensures security and helps protect against fraud.

We also use cookies to give us more understanding of how people use our website. Cookies are very small text files that are stored on your computer when you visit some websites. We use cookies to help identify your computer, so we can improve your user experience.

### **Contact details**

Please contact us if you have any questions about this privacy notice or the information we hold about you or to exercise any rights or make a complaint at:

The Data Controller, Merton Park Ward Residents Association; E mail: [mpwra@mertonpark.org.uk](mailto:mpwra@mertonpark.org.uk)

You can contact the Information Commissioners Office on 0303 123 1113 or via e mail <https://ico.org.uk/global/contact-us/email/> or at the Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF.