

Subud Britain Privacy Statement

Rev3 22 May 2018

Subud Britain is committed to protecting personal data under all applicable laws, including the General Data Protection Regulation (GDPR) and the Data Protection Act 2018.

Personal Data

Subud Britain collects, controls and processes the following personal information.

1. Membership data

This includes a new member's registration data, changes of contact details of existing members, consent of a member to receive news and events information from Subud Britain, and consent to be included in the Members' Directory. The data is collected from the data subject, who may be a new or existing member. The following data collection methods are applicable:

- *Membership application form* including identity data and contact information
- Change of contact details or data processing consent as recorded by Membership Secretary, or collected by the Group Secretary and passed to the Membership Secretary.
- *Census Form*

The data is held in the National Membership Database, which is encrypted and kept confidential at national level. The data is held on the basis of legitimate interest: it is Subud Britain's legitimate interest to know who its members are, since they may access the benefits of membership, such as attending the latihan kejiwaan meetings at group level, attending national congresses, and receiving members-only publications, such as the Members' Directory and the publications of Bapak and Ibu Rayahu. Subud Britain has a responsibility to restrict these benefits to members only. If a member lapses or leaves Subud, we remove them from the group list and future publications of the Members' Directory, and record in the National Membership Database that they have left or lapsed: their information is not processed further unless they return. Upon request, we also delete their entry entirely from the National Membership Database, unless there are outstanding claims, contractual or legal obligations, or any other overriding legitimate interest to continue to hold their data.

The National Membership Database only contains data supplied by the member himself or herself. It is not shared with any other organisation or transmitted to any other country.

Separate from the National Membership Database, members may give their consent for their contact details to be used to receive information from Subud Britain and held in the group list. The group list is used at group level to inform members of news and events. Separately, members may also consent to have their contact details shared with other members, which takes place in the Members' Directory, the Updates Section of The Journal, and upon request to National Office. The Members' Directory is published from time to time to members only, and only contains contact details of active members who have opted-in.

2. Expenses

Expenses forms are sent by the data subject, i.e. a member claiming expenses, to the Local/Regional/National Treasurer or Accountant for approval and payment:

- *Local & Regional Expenses Claim Form*
- *National Expenses Claim Form*
- *National Expenses Claim Form (Hosting)*

This data is held on the basis of a legal obligation (accounting data). It is shared with our accountant and auditors.

3. Donations

Donation forms are sent by the data subject, i.e. the donor, to the Accountant. Means of data collection:

- *Gift Aid Form Single Donation*
- *Gift Aid Form Standing Order*

This data is held on the basis of a legal obligation. It is shared with our accountant, auditors and HMRC.

4. Helpers

The data subject, a new or existing Helper, sends his or her data to the Helpers' Secretary on the following forms:

- *Helper Application Form*
- *All Helpers Development Weekend Booking Form*

Personal information supplied on the Helper Application Form is used with the applicant's consent to process the application to become a Helper, and not used for any other purpose. The data is sent outside the UK to the World Subud Association, since the authority to appoint Helpers rests with the International Helpers.

The All Helpers Development Weekend Booking Form is used for administering helpers' events.

5. National Employees

Data is collected and held by the Human Resources Manager. The data subject, an employee, provides his or her name and contact details. The Human Resources Manager also keeps private information on relevant employment information, such as:

- application records
- interview records
- performance records
- appraisal records
- employment history
- annual leave details
- salary details

The Accountant keeps financial information relevant to the employment:

- bank account details, pension details, tax information

The data is processed on the basis of contractual and legal obligations for employment. Relevant data is shared with our accountants, auditors, HMRC, and our pension provider.

6. Congresses

Attendees of congress supply their own data to the Congress Organisers via the Congress Registration Form. Part of this information is shared with the venue according to our contract.

The data is held and processed on the basis of contractual obligations.

7. Safeguarding

The Designated Safeguarding Officer collects sensitive data according to our legal obligations for the safety of children and vulnerable adults. These obligations potentially relate to all Subud Britain events, but are especially applicable to activities run for children or vulnerable adults.

These data include Disclosure and Barring Service (DBS) checks on persons running events for children or vulnerable adults. They may also include confidential complaints or reports on any person whom the DSO regards as a possible risk to children or vulnerable adults. These data are held in an electronic database, which is encrypted and kept confidential.

8. Archives

Data is passed to the Archives from time to time. The Archives are held for purposes of archiving in the public interest, for scientific and historical research, including statistical purposes.

Your rights

You have a number of statutory rights with respect to each category of data and its lawful basis. Please direct any requests to our Data Protection Officer and National Secretary, contact details below.

Please see the Information Commissioner's Office website for a full description of your rights:

<https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/>

1. Right to be informed

We will inform you about the collection and processing of your personal data. Normally this will be done in the form of a privacy notice attached to every form in which personal data is collected. Normally we do not obtain personal data from any other source except for the data subject, but if we do, we will inform you within one month.

2. Right of access

Upon request, we will give you a copy of any and all the personal data that we hold about you.

3. Right of rectification

We will correct any personal data about you upon request.

4. Right to erasure

Upon request, we will erase your data if it is held on the basis of your consent. Note that we will not erase your data if we require it on other bases:

- to comply with legal obligation
- to fulfil a contract
- for the establishment, exercise or defence of legal claims
- where we have an overriding legitimate interest
- for archiving purposes in the public interest

5. Right to restrict processing

If you have noticed an inaccuracy or incompleteness in your personal data, you can request us to limit the processing for as long as we are dealing with your request. You may also request us to limit the processing of your data if you believe that we are wrongfully processing your data or if we no longer need them, or if you have lodged an objection against the processing or the further processing of the data. After the receipt of your limitation request, we will continue to process the data only with your permission or if there are compelling reasons for doing so (such as legal proceedings).

6. Right to object

You may lodge an objection at all times against the processing of your personal data. We will cease processing your data following receipt of your objection, unless we have justifiable reasons that outweighs your objection. If so, we will inform you of these reasons in writing.

Who are we, and how to contact us?

The data controller is Subud Britain, a company limited by guarantee and registered in England & Wales, and a charity registered in England & Wales and in Scotland. Company Registration No. 678027; Charity No. 233282 (England & Wales); Charity No. SCO39009 (Scotland). Registered Office: Waugh & Co, 51 High Street, Arundel, BN18 9AJ.

Data Protection Officer: Ridwan Kennedy (National Secretary)

Email: admin@subud.org.uk

Telephone: 0870 444 2604

Subud Britain has a complaints policy which can be found on our website at <https://www.subudbritain.org/policies-practices/>

You have the right to complain to a supervisory authority: in the UK this is the Information Commissioners Office (ICO) and you can contact them via their website: <http://www.ico.org.uk>