

Ireland Brownfield Network (the IBN) Privacy and Data Policy (June 2020)

General Data Protection Regulation (GDPR)

The General Data Protection Regulation (GDPR) is a European-wide law that applies to how organisations store and use personal data. The primary aim of the GDPR is to give individuals control over their personal information.

Introduction

This Policy explains how and why the IBN collects personal information about members and individuals that visit the IBN website, and those that take part in consultations and surveys.

By using the IBN website, you are agreeing to be bound by this Policy.

Any questions regarding this Policy and our privacy practices should be sent by email to info@irelandbrownfieldnetwork.com.

This Policy was:

- Prepared by: David Kerr, Chairperson of the IBN (12th April 2020)
- Reviewed by: Olivia Hall, Secretary of the IBN (13th April 2020)
- Approved by: Executive Committee by Vote (11th May 2020)

This Policy came into effect on 1st June 2020 and will be reviewed by the Executive Committee annually.

The IBN is a not for profit organisation that will only retain personal information for the establishing and maintaining of memberships; supporting bodies or associations not established or conducted for profit; or providing or administering activities for individuals who are members of the body or association or have regular contact with it.

The IBN is represented by an Executive Committee, in which the following individuals are responsible for collecting, organising and maintaining personal information:

- Chairperson – Responsible for ensuring legal compliance; ensuring that all systems, services and equipment used for storing data meet acceptable security standards.
- Secretary – Responsible for updating the Executive Committee regarding its legal obligations.
- Membership Co-Ordinator – Responsible for collecting, collating and storing membership information and dealing with personal data information requests.
- Liaison Officer – Approving data protection statements attached to communications including emails and letters.
- Event Co-Ordinator – Responsible for collecting data relevant to the organising, attending and communicating regarding all IBN events.

The roles and responsibilities of the Executive Committee Members with responsibility for storing, maintaining and using personal data is interchangeable and subject to review as required.

How the IBN Collects Your Information

The IBN collects the following information when you register as a member, attend an event or respond to a consultation:

- Name
- Date of Birth
- Home Address
- Business/ Institute Address
- Personal Email
- Business Email
- Home Telephone Number
- Mobile Telephone Number
- Paypal, Bank or card details (where required for applications and events)
- Signature (where required for applications and events).

The IBN collects information in the following ways:

- Email
- Online form
- Paper forms
- Excel and Word documents
- PDF Documents (Scans)

IBN members have a personal responsibility to ensure that their own data is accurate and up to date. Members are responsible for ensuring that only necessary information is provided to the IBN through the mediums outlined above. Members are also responsible for ensuring that sensitive details, such as financial and membership details are not shared with others outside those responsible as outlined above.

How is Your Information Used?

The IBN collects and processes your personal information for the following reasons:

- Processing membership and/or sub-group applications and maintenance.
- Processing information and data requests.
- When seeking membership views, comments or input regarding IBN activities, events, consultations and services.
- Processing payments (where required) for events and attendances.
- Sending requested information or that may be of interest, such as webinars; conferences and other events; news; and/or other initiatives.

This processing is necessary for membership contracts and for members legitimate interests. The IBN will only ever send you communications which you have requested or that may be of interest to you that comply with the purposes of your membership.

Who Has Access to Your Information?

The following person(s) will have access to your information on a need to know basis:

- Approved IBN Executive Committee Members;
- Third party providers that the IBN collaborates with, such as other institutions, event organisers and accreditation providers.
- Legal bodies when required by law, court order or to prevent fraud or crime.

The IBN will not sell or rent your information to third parties. The IBN will not share your information with third parties for marketing purposes.

The IBN may pass on only relevant information to third-party service providers for the purposes of completing tasks and providing services to you on our behalf (for example to process payments and send you mailings). Only information required to deliver those services will be provided. The IBN will ensure that where this is required, a contract is in place to prevent any third parties from using your information for direct marketing purposes. The IBN will only provide information to third parties for marketing purposes where you have requested that it be done.

Please be reassured that the IBN will not release your information to third parties for them to use for their own direct marketing purposes, unless you have requested us to do so, or the IBN are required to do so by law, for example, by a court order or for the purposes of prevention of fraud or other crime.

Where payment to third party product providers, your payment is processed by a third-party payment processor that specialises in the secure online capture and processing of credit/ debit card transactions. If you have any questions regarding secure transactions, please contact. The IBN will not retain any credit, debit or bank details unless requested by you.

Your Choices (consent)

You have a choice about whether or not you wish to receive information from us. If you do not want to receive communications from the IBN, then you can select your choices by ticking the relevant boxes on the membership or other forms from which information is collected and used.

Existing members, as of April 2020, will be offered a 'positive opt-in' option to continue to receive information from the IBN. In addition, the IBN will continue to review this consent as part of ongoing relationship with members. This policy will be refreshed pending any significant legal and policy changes.

How You Can Access and Update Your Information

All individuals who are the subject of personal data held by the IBN are entitled to:

- Ask what information the IBN holds about them and why.
- Ask how to gain access to it.
- Be informed how to keep it up to date.
- Be informed how the IBN is meeting its data protection obligations.

- Request their information from the IBN by submitting a 'subject access request'.

Subject access requests from individuals should be made by email, addressed to the data controller at info@irelandbrownfieldnetwork.com. The IBN will provide information within one calendar month of receiving it. The IBN can extend this by a further two months for complex or numerous requests (in which case the IBN must inform the individual and give an explanation).

The data controller will always seek to verify using "reasonable means" the identity of anyone making a subject access request before handing over any information.

Right to Erasure - Including Retention and Disposal

Individuals have the right to be forgotten and can request the erasure of personal data when:

- It is no longer necessary for the purpose the IBN originally collected/processed it.
- The individual withdraws consent.
- It was unlawfully processed (i.e. otherwise in breach of the GDPR);

The IBN rely on legitimate interests as its basis for processing, the individual objects to the processing of their data, and there is no overriding legitimate interest for the IBN to continue this processing.

Individuals can make a request for erasure verbally or in writing. The IBN will seek to verify the identity of the person making the request, using "reasonable means". The IBN will respond within one calendar month of receiving it. The IBN can extend this by a further two months for complex or numerous requests (in which case we must inform the individual and give an explanation).

A written retention policy or schedule will be used to remind the IBN when to dispose of various categories of data, and help the IBN plan for its secure disposal. The IBN will designate responsibility for retention and disposal to an appropriate person.

Security Precautions in Place to Protect the Loss, Misuse or Alteration of Your Information

The IBN employs the following security precautions to protect any personal data and/or information:

- The information and/or data is held in a password protected 'vault' on a secure cloud-based server with file encryption at rest and in transit, version history, and virus scanning on download.
- When required, all member bank details will be kept and managed using PayPal, which has extensive and published security measures in place. The only persons that can access these details are the IBN Treasurer and Chairperson.

The IBN will not analyse or plan to analyse personal information to create a profile of your interests and preferences.

Use of 'Cookies'

The IBN website does not use cookies other than those required for its operation.

Links to other websites

Our website may contain links to other websites run by other organisations. This policy applies to the IBN website only. The IBN is not responsible for the policies and/or practices of other sites even if you access them using links from our website.

Transferring your Information Outside of Europe

As part of the services offered to you through this website, the information which you provide to us may be transferred to countries outside the European Union ("EU"). By way of example, this may happen if any of our servers are from time to time located in a country outside of the EU. These countries may not have similar data protection laws to the UK. By submitting your personal data, you're agreeing to this transfer, storing or processing. If the IBN transfer your information outside of the EU in this way, the IBN will take steps to ensure that appropriate security measures are taken with the aim of ensuring that your privacy rights continue to be protected as outlined in this Policy.

Data Breach

The GDPR introduces a duty on all organisations to report certain types of personal data breaches to the Information Commissioner's Office (ICO) and, in some cases, to the individuals affected. A personal data breach means a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data.

The IBN will have to notify the ICO of a breach unless it is unlikely to result in a risk to the rights and freedoms of individuals. Where a breach is likely to result in a high risk to the rights and freedoms of individuals, the IBN must notify those concerned directly and without undue delay.

In all cases, the IBN must maintain records of personal data breaches, whether or not they are notifiable to the ICO.

The IBN would report a notifiable breach to the ICO without undue delay, but not later than 72 hours after becoming aware of it. The GDPR recognises that it will not always be possible to investigate a breach fully within that time-period and allows us to provide additional information in phases, so long as this is done without undue further delay

The IBN internal breach reporting procedure will be reviewed annually and in accordance with updates to legislation.