

# The Cochin Club of Great Britain Data Protection & Privacy Policy

## 1. INTRODUCTION

The Cochin Club is committed to protecting your privacy and security. This policy explains how and why we use your personal data, to ensure you remain informed and in control of your information.

The Club will ask its members and supporters to “opt-in” for marketing communications. This is in accordance with the General Data Protection Regulation which comes into force on 25th May 2018 and sets out the rules which govern how we can communicate with you. Therefore we are introducing a new approach that relies on you giving us your consent about how we can contact you. This means you’ll have the choice as to whether you want to receive information and be able to select how you want to receive them (email, phone or post).

You can decide not to receive communications or change how we contact you at any time. If you wish to do so please contact the club Secretary by emailing [cochinclubgb@gmail.com](mailto:cochinclubgb@gmail.com), or writing to Mrs E. Armstead, The Cochin Club Secretary, Brow Top Barn, Thornthwaite, Harrogate, North Yorkshire, HG3 2QS or telephoning 07894858108.

We will never sell your personal data, and will only ever share it with organisations we work with where necessary and if its privacy and security are guaranteed.

Any questions you have in relation to this policy or how we use your personal data should be sent to [cochinclubgb@gmail.com](mailto:cochinclubgb@gmail.com) or addressed to Mrs E. Armstead, The Cochin Club Secretary, Brow Top Barn, Thornthwaite, Harrogate, North Yorkshire, HG3 2QS

## 2. ABOUT US

Your personal data (i.e. any information which identifies you, or which can be identified as relating to you personally) will be collected and used by the Cochin Club and for the purposes of data protection law, the club will be the Data Controller.

## 3. WHAT INFORMATION WE COLLECT

### Personal data you provide

We obtain personal data about you when you make an enquiry, join us as a member, apply and qualify as a judge, make a donation, place an order to purchase goods or services from us, are a point of contact for a Breed Club or Affiliated Show/Society or volunteer for us. For example:

- personal details (name, date of birth, email, address, telephone etc.) when you join as a member or supporter;
- financial information (payment information such as credit/debit card or direct debit details, and whether donations are gift-aided. Please see section 7 for more information on payment security)
- if you purchase PCGB membership as a gift for someone, join as a family or are the parent of one of our juvenile members or supporters, your details will be recorded (as will the recipients) and your relationship to that person will be recorded.
- your activities and involvement with PCGB will result in personal data being created. This could include details of how you’ve helped us by volunteering or being involved with the National Championship Poultry & Eggs Show and other activities.
- if you decide to donate to us then we will keep records of when and how much you give.
- record details of purchases of merchandise and despatch address to enable delivery
- acting as a point of contact for a Breed Club or Affiliated Show or Society

### Information we generate

We will include personal data in the form of results for members and non-members who have achieved a placing at the regional shows and may also publish results from other shows. This may include personal information regarding non-members who have taken part. We may also publish details of those members and supporters who win awards or trophies.

### Information from third parties

We sometimes receive personal data about individuals from third parties. For example, we may receive results from poultry clubs and shows/societies.

### Sensitive personal data

We do not normally collect or store sensitive personal data (such as information relating to health, beliefs or political affiliation) about supporters and members.

## **3. HOW WE USE INFORMATION**

We only ever use your personal data with your consent, or where it is necessary in order to:

- enter into, or perform, a contract with you such membership services, participation in fundraising events such as the National Championship Poultry & Eggs Shows & Sale, sale of goods from the PCGB shop, Breed Standards Book or leg rings;
- comply with a legal duty;
- protect your vital interests;
- for our own (or a third party's) lawful interests, provided your rights don't override these.

In any event, we'll only use your information for the purpose or purposes it was collected for (or else for closely related purposes):

- we use personal data to communicate with people, to promote the club, this includes keeping you up to date with our news, updates and breed information.
- helping us respect your choices and preferences (e.g. if you ask not to receive marketing material, we'll keep a record of this).
- we use personal data for administrative purposes (i.e. to carry provide membership services).

This includes:

- receiving donations (e.g. direct debits or gift-aid instructions);
- maintaining databases of our members and supporters
- performing our obligations under membership agreements
- fulfilling orders for merchandise (whether placed online, over the phone or in person);

## **4. DISCLOSING AND SHARING DATA**

We will never sell your personal data. If you have opted-in to receiving marketing information, we may contact you with information about our partners, or third party products and services, but these communications will always come from the club and will usually be incorporated into our own marketing materials (e.g. advertisements in magazines or newsletters).

We may share personal data with subcontractors or suppliers who provide us with services. For example, if you enter the breeder's directory then your details will be shared with the print company printing the yearbook. However, these activities will be carried out under a contract which imposes strict requirements on our supplier to keep your information confidential and secure.

Data relevant to the financial transactions of the PCGB will be shared with our appointed accountant and if required appointed auditor.

## **5. MARKETING**

The Club will ask its supporters to “opt-in” for marketing communications. This includes all our marketing communications (the term marketing is broadly defined and, for instance, covers information about the delivery of the aims and objectives of the club). This means you’ll have the choice as to whether you want to receive this information and be able to select how you want to receive them (post, phone, email).

You can decide not to receive communications or change how we contact you at any time. If you wish to do so please contact The Secretary by emailing [cochinclubgb@gmail.com](mailto:cochinclubgb@gmail.com) or writing to the Club Secretary Mrs E. Armstead, The Cochin Club Secretary, Brow Top Barn, Thornthwaite, Harrogate, North Yorkshire, HG3 2QS or telephoning 07894858108.

### What does ‘marketing’ mean?

Marketing does not just mean offering things for sale, but also includes news and information about:

- our club, campaigns and delivery of the aims and objectives;
- participation in regional shows and the club shows.
- Other shows and societies and Breed Clubs including forthcoming shows and results
- appeals and fundraising (including donations and also competitions, raffles etc.);
- our events, activities and local groups;
- products, services and offers (our own, those of third parties which may interest you)

### The Club Publications

Membership newsletters, Yearbook are provided as a benefit to our members. We send these out to all our paid up members (unless you specifically ask us not to), however, please be aware that membership publications may include advertisements, competitions and fundraising information.

## **6. YOUNG PEOPLE**

We want young people to join the Club activities and there are opportunities in our publications for members to share their photos, stories and pictures. If we publish your child’s picture, photo or story, we’ll usually include their first name and age with it. If they write an article or story for us, we might also include their surname alongside it.

If your child enters a competition or class at a show and is one of the lucky winners or placed, we’ll publish their name and winning entry alongside the other winners.

Parental permission: If your child is under 18 then we’ll need permission from you as their parent or guardian for them to enter one of our competitions or to share a picture, photo or story with us.

### Information for parents

We take great care to protect and respect the rights of individuals in relation to their personal data, especially in the case of children. If your child is under 18, we’ll only use his or her personal data with your consent. This means that, for example, if your child wants to have his or her name or picture featured in one of our member publications, we’ll need you to confirm you’re happy for us to do so.

We won’t send marketing emails, letters, calls or messages to under 18 year-olds for the sole purpose of fundraising. In order to make a donation to the club or order things from us online, you need to be an adult.

The Club adult membership is available to individuals aged 18 and over. Under 18s can have juvenile membership purchased for them by an adult.

We won't use young people's personal data for marketing purposes. If a juvenile member turns 19 and wishes to join the club as an adult, some of the personal data we hold about that individual (e.g. juvenile membership history) will be carried over to their member profile.

## **7. HOW WE PROTECT DATA**

We employ a variety of physical and technical measures to keep your data safe and to prevent unauthorised access to, or use or disclosure of your personal information.

Electronic data and databases are stored on secure computer systems and we control who has access to information (using both physical and electronic means).

### Payment security

If you use a credit card to donate, purchase a membership or purchase something on-line we will pass your credit card details securely to our payment providers (Paypal). The Club complies with the payment card industry data security standard (PCI-DSS) published by the PCI Security Standards Council, and will never store card details.

Of course, we cannot guarantee the security of your home computer or the internet, and any online communications (e.g. information provided by email or our website) are at the user's own risk.

## **8. STORAGE**

The Clubs operations are based in the UK and we store our data within the UK. Some organisations which provide services to us may transfer personal data outside of the EEA, but we'll only allow them to do if your data is adequately protected.

Computers are password protected and data is encrypted.

For example, some of our systems use Microsoft products. As a US company, it may be that using their products result in personal data being transferred to or accessible from the US. However, we'll allow this as we are certain personal data will still be adequately protected (as Microsoft is certified under the USA's Privacy Shield scheme).

### How long we store information

We will only use and store information for as long as it is required for the purposes it was collected for. How long information will be stored for depends on the information in question and what it is being used for. For example, if you ask us not to send you marketing emails, we will stop storing your emails for marketing purposes (though we'll keep a record of your preference not to be emailed).

All information provided in paper format is stored securely at the Club Secretary's address, Brow Top Barn, Thornthwaite, Harrogate, North Yorkshire, HG3 2QS is only handled by the Secretary.

We continually review what information we hold and delete/destroy securely what is no longer required.

## **9. KEEPING YOU IN CONTROL**

We want to ensure you remain in control of your personal data. Part of this is making sure you understand your legal rights, which are as follows:

- the right to confirmation as to whether or not we have your personal data and, if we do, to obtain a copy of the personal information we hold (this is known as subject access request);
- the right to have your data erased (though this will not apply where it is necessary for us to continue to use the data for a lawful reason);

- the right to have inaccurate data rectified;
- the right to object to your data being used for marketing or profiling; and
- where technically feasible, you have the right to personal data you have provided to us which we process automatically on the basis of your consent or the performance of a contract. This information will be provided in a common electronic format.

Please keep in mind that there are exceptions to the rights above and, though we will always try to respond to your satisfaction, there may be situations where we are unable to do so.

### Complaints

You can complain to the Club directly by contacting our secretary using the details set out above. If you are not happy with our response, or you believe that your data protection or privacy rights have been infringed, you can complain to the UK Information Commissioner's Office which regulates and enforces data protection law in the UK. Details of how to do this can be found at [www.ico.org.uk](http://www.ico.org.uk)

## **10. COOKIES AND LINKS TO OTHER SITES**

### Cookies

Our website uses local storage (such as cookies) to provide you with the best possible experience and to allow you to make use of certain functionality (such as being able to shop online)

### Links to other sites

Our website contains hyperlinks to many other websites. We are not responsible for the content or functionality of any of those external websites (but please let us know if a link is not working by emailing [cochinclubgb@gmail.com](mailto:cochinclubgb@gmail.com), or writing to Mrs E. Armstead, The Cochin Club Secretary, Brow Top Barn, Thornthwaite, Harrogate, North Yorkshire, HG3 2QS

If an external website requests personal information from you (e.g. in connection with an order for goods or services), the information you provide will not be covered by the Clubs Privacy Policy. We suggest you read the privacy policy of any website before providing any personal information.

When purchasing goods or services from any of the businesses that our site links to, you will be entering into a contract with them (agreeing to their terms and conditions) and not with The Cochin Club.

## **11. CHANGES TO THIS PRIVACY POLICY**

We may amend this Privacy Policy from time to time to ensure it remains up-to-date and accurately reflects how and why we use your personal data. The current version of our Privacy Policy will always be posted on our website.

This Privacy Policy was last updated on 15th January 2020.

Adopted on: 13th March 2018

Reviewed: 15th January 2020.

Date of Next Review: 15th January 2022.

Signed: *E. Armstead* (Data Protection Officer / Secretary of The Cochin Club)

These policies and procedures will be reviewed periodically to ensure compliance with changes in law and equality and diversity legislation.