

Ulster Reform Club Privacy Policy – Key Facts

Introduction

As with many other organisations, Ulster Reform Club, hereinafter known as “the Club”, must hold and process some personal data to enable us to run the Club and provide the services required.

We take this responsibility seriously.

Ulster Reform Club is a private Members’ Club operated under the auspices of the Registration of Clubs Regulations (NI) Order 1997. Our Members and their Guests come together for a variety of reasons. It is our basic assumption that you wish to participate in, or be informed about, all of the activities that take place in an organisation such as the Club.

Constitution & Rules – Fundamental Objects and Principles –
“ To promote social intercourse among the Members “

We have used this understanding to guide our policy.

Under the General Data Protection Regulations (GDPR) and the Data Protection Act 2018, we are required to explain how we will hold and process your data.

For simplicity, we will refer to both as the Data Protection Regulations (DPR).

Most of the new laws build on the law as at April 2018 and reflect changes in practice and technology.

What data do we need or collect and how will we use it?

Under the DPR we must advise you of:

1. The types of data that we collect.
2. How we process it.
3. How long we will keep it for.
4. Your rights under the new laws. Under the law you are known as the Data Subject.

Our basis for holding and processing your data

The data that we hold about you, belongs to you.

Under the DPR, we must establish a lawful basis for holding and processing your data.

There are a number of bases available to us and we can use any combination of them.

Of the 6 major categories, we will rely on 3:

Basis	Description
Contract	For you to access the services provided by the Club we must hold and process your details. For example, membership renewals, AGM notifications, booking confirmations etc.
Legitimate Interest	The Club might have to process personal data for other reasons. We will assess the need for this against the Data Subjects' rights before proceeding.
Legal	To comply with our legal requirements.
Consent	You may withdraw your consent from general purpose electronic marketing only.

Your rights

We must demonstrate why we are holding and processing your data.

We should not hold or process your data if it is reasonably possible to achieve our purpose by any other means.

The following summarises your rights.

Right to	What you can ask for	Our obligation
Access	You can ask us to confirm the details that we hold about you and why	We are not always obliged to comply
Rectification	You can ask us to rectify a mistake	We are not always obliged to comply
Erasure	You can ask us to erase / forget your data	We are not always obliged to comply
Object	You can object to our holding your data	We are not always obliged to comply
Portability	You can ask us to provide you with an electronic copy of your data	Only the data that you provide to us and we process electronically

If you wish to exercise your rights

If you wish to exercise any of these rights, you should contact the Data Controller;

Accounts Manager
Ulster Reform Club

Refusal to comply

In general, where we do not comply with your request, we must provide you with an explanation.

Fees

Under limited circumstances, we can charge a fee for some requests.

Where we feel some types of request are unfounded or excessive, we can request a payment that covers our administrative costs.

We do not have to respond to your request until that fee has been received.

Timing

Under normal circumstances, we must respond promptly, but within one calendar month.

In some circumstances, where your request is complex or large, we can take more time. (Up to two months.)

You have the right to complain

If you are dissatisfied with our decision or response, the length of time we take or the decision to charge a fee, you have the right to complain to the Supervisory Authority and also to a judicial review.

Our Employees

Our Employees have the same rights under the DPR, and are also Data Subjects.

As your employer we will collect, source and generate a quantity of personal data about you. Most of this data is to allow us to comply with our contractual and legal obligations.

We will also have legal and legitimate interests in collecting data for appraisals and performance monitoring, and health and safety obligations.

We have provided more information about your personal data in the full policy document.