

## **PRIVACY NOTICE**

Adopted June 2022 and to be reviewed June 2023

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### **Purpose**

1. This policy document sets out how the Society of Writers to His Majesty's Signet (**the WS Society**) handles personal data and enacts privacy principles.
2. The purpose of this policy is to protect the privacy and personal data of the WS Society's stake holders and to protect the integrity and reputation of the WS Society.

### **Regulatory framework**

3. The WS Society is a registered entity with the Information Commissioners' Office (ICO).
4. The WS Society has adopted procedures to comply with the *Data Protection Act 1998* and the *EU General Data Protection Regulation (GDPR)*.

### **Categories of data**

5. The WS Society keeps and processes personal data for:
  - 5.1. Writers to the Signet, Affiliate, Associate and Student members of the WS Society;
  - 5.2. Trustees;
  - 5.3. Executive staff;
  - 5.4. Volunteers;
  - 5.5. On behalf other registered charities holding management service agreements for the provision of administrative services by the WS Society's wholly owned trading subsidiary Signet Mercantile Limited (SML), with personal data being kept and processed for charity trustees, members, applicants and referees.

### **Special category - children**

6. The WS Society keeps and processes personal data relating to children only under its administrative services arrangements with charity clients. Each charity holding personal data relating to children has its own Data Protection Policy.
7. The WS Society recognises that children need particular protection when their personal data is collected and processed and operates its own safeguarding policy.

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8. The WS Society recognises there are special requirements under GDPR relative to data held for children. This is termed a 'special category data' and the data may include, for instance, medical and sensitive information for children under the age of 13.

## **Consent**

9. Article 6 of the GDPR sets out the lawful bases for the processing of data. Consent will be the lawful basis most commonly used by the WS Society to process data.
10. Consent to process data has been built into WS Society's communications including application forms, booking forms and newsletters. Application forms are accessible via the Society's website.
11. The WS Society recognises that consent is not the only lawful basis for processing data. The lawful basis of legitimate interest may be relied upon when contacting referees for applicants. However, legitimate interest flows from the initial consent which is ascertained at the time of the application.

## **Use of personal data**

12. The WS Society will only use personal data for the following purposes:
  - 12.1. To inform and allow the WS Society's trustees to evaluate an application and make a decision on whether to admit an individual to the WS Society.
  - 12.2. To provide notification of meetings and events.
  - 12.3. To maintain a register of current employees and volunteers.
  - 12.4. To maintain a register of current trustees and individuals formerly trustees within the past six years.
  - 12.5. Whilst carrying out administration for the WS Society's charity clients, in accordance with each client's Data Protection Policy.
13. The WS Society only uses personal information to notify members of meetings and events. Personal information of those outside of the WS Society's membership is not used in marketing activities.
14. The WS Society will respond to requests to access, rectify and suppress their personal data held by the Society.

## **Storage**

15. The WS Society has a secure cyber cloud provided by Microsoft OneDrive for storage of online records. The cloud is only accessible by authorised staff. Hard copy records are kept in a locked filing facility on site at the Signet Library.

## **Archiving**

16. The WS Society will ensure that personal data is kept for no longer than necessary. Personal data shall not be kept for any persons including those nominated in paragraph 5 for any longer than is necessary and only as required by law.

Mandy Laurie WS  
Trustee  
18 June 2022