

BSH Privacy Policy

1. What is the purpose of this Privacy Policy?

This Privacy Policy explains how the BSH looks after your personal data in order to provide membership and registration services in accordance with applicable legislation intended to protect your personal data and privacy, including the General Data Protection Regulation and related rules. We also explain what your rights are.

By providing your personal data you acknowledge that we will only use it in accordance with this Privacy Policy.

This Policy applies where the BSH acts as data controller; this means we are responsible for deciding how we hold and use your personal data and are therefore also responsible for compliance with the relevant data protection laws.

It is important that you read this document together with any other privacy notice we may provide on specific occasions, so you are aware of how and why we are using your personal data.

2. How will we use your personal data?

Data protection laws require that the personal data we hold about you must be:

- used lawfully and fairly, and in a transparent way.
- collected only for valid purposes that we have clearly explained to you and not used in a way that is incompatible with these purposes.
- relevant to the purposes we have told you about and limited only to these purposes.
- accurate and kept up to date.
- kept secure and confidential.
- kept only as long as necessary for the purposes we have told you about.

3. How do we ensure the security of your personal data?

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need for the BSH to use your data. They will only process your personal data on our instructions and are subject to a duty of confidentiality.

We have also put in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so.

As part of our data security measures we ensure that we train our employees and contractors and have appropriate data protection in place to support our compliance.

4. What kind of personal data may we hold about you?

Personal data means any information about an individual from which that person can be identified.

In order to provide our membership and registration services, depending on which you select, we may collect the following personal data about you.

- contact details such as name, address(es), telephone number(s), email address(es).
- identification information such as payment details, occupation, employer and job title.

We may also collect, store and use special personal data about you such as dietary requirements and food allergies.

5. How may we collect your personal data?

We may collect data from you in a number of ways, depending on the service or services you require from the BSH.

Information you give us

You may choose to provide us with your personal data by corresponding with us by:

- telephone
- email
- or other means

Information we receive from other sources

We may receive information from third parties by file, particularly from other organisations who want to send a number of delegates to a BSH event.

6. How will we use your personal data?

We will only use your personal data when the law allows us to. Most commonly we use your personal data to provide you with membership services, to process your application to a BSH event, to comply with a legal obligation and where it is necessary for our legitimate interests, as detailed below.

BSH Membership

Typically, we ask for contact details such as name, address, emails and telephone/mobile phone numbers in order to fulfil an annual membership with the BSH.

Additional information that we need to process your order is your hospital or affiliation, and your occupation, so that the correct membership fee is allocated to your membership.

We will also take payment details, usually in the form of credit/debit card, or bank details in the case of a standing order. Financial details are not recorded on our database and are used once only to obtain payment.

Registration for a BSH Event

Details of an application to a BSH event is usually collected from a completed form, and requests information such as name, address, contact number, email, work affiliation, occupation, and sometimes special dietary requirements.

With this information and a payment, the BSH will process the application and return a registration document containing the information collected (excluding payment type details) via a third party secure email delivery company.

To comply with a legal obligation

Where we are required to use your personal data and maintain records of our dealings with you by our regulators, such as the Charities Commission, the Information Commissioner's Office (ICO) and HMRC. For example:

- in response to complaints and data subject access requests.
- to investigate, prevent or detect crime.

Where it is necessary for our legitimate interests (or those of a third party), so long as your interests and fundamental rights do not override those interests. For example:

- to respond and manage ad hoc enquiries and complaints.
- to provide management information to help us understand and improve our business, to maintain our business records, to manage our financial position and for training purposes.
- for accounting, auditing purposes and for corporate governance.
- to assist with debt recovery.
- to provide and improve customer support.
- to manage risk for the BSH and our customers.
- to establish, exercise or defend our legal rights, where we are faced with any legal claims or where we want to pursue legal claims ourselves.
- to prevent, investigate and detect fraud.

7. If you choose not to provide or update personal data.

If you do not provide the required information we may not be able to provide BSH services and we may not be able to comply with our legal obligations, such as verifying your identity. It could mean that we have to cancel the service you have requested from us.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes.

8. Who may we share your personal data with?

We may share your personal data with third parties where required by law, where it is necessary to provide our services, to administer your contract with us or where we have another legitimate interest in doing so, in each case for the purposes described in this Privacy Policy.

We may share your personal data with the following third party service providers who also support the provision of our services: IT and back office administration services; bulk email services; printers; survey and marketing communication providers; professional advisors; compliance services; and other such suppliers we may use from time to time. These third parties may also be data controllers or data processors in their own right and have their own privacy policies.

Where we are under a legal duty to do so, we may share your personal data with HMRC and other tax authorities, the ICO, the courts, the police and other law enforcement agencies.

We will not sell your details to any third party. We will not use or share your personal data for marketing purposes without your explicit consent.

We will only share your personal data for the purposes specified in this Privacy Policy and on the basis that it will be kept confidential and will only be used for the reasons described.

9. Transferring Information outside the European Economic Area (EAA).

The BSH will only transfer personal data outside the European Economic Area (EAA) to third party providers who are fully compliant with GDPR.

10. How long will we use your information for?

We will keep your personal data for as long as you are a customer of the BSH. Thereafter we may keep your records for up to 7 years to enable us to respond to any questions or complaints, and to inform you of BSH services

11. Your rights in connection with personal data

You can ask us to do certain things with your data such as provide a copy of it, correct it, or delete it. There may be reasons why we cannot comply with a request and we will tell you if this is the case and give our reasons.

Under certain circumstances you have the right to:

Request access to your personal data (“data subject access request”). This enables you to confirm whether we are processing your personal data and to receive a copy of the personal data we are processing, and certain information about how we use your personal data.

Request a correction to the personal data that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.

Request the erasure of your personal data. You can ask us to delete or remove personal data: where the processing is no longer necessary for the original purpose; where you withdrew your consent; where the processing is unlawful; or where your personal data must be erased to comply with the law. In some cases, if we have a legitimate interest or another legal basis for processing your data, we may not be able to comply. We will tell you if this is the case.

Request the restriction of the processing of your personal data. You can ask us to restrict the processing of your personal data where you think the data we hold is inaccurate until we can verify its accuracy, or you believe we no longer need to process your personal data (but you do not want it erased), or you wish the processing to be restricted pending confirmation that our processing is based on our overriding legitimate interest.

Object to the processing of your personal data. You have the right to object to us processing your personal data: where we are doing so based on our legitimate interest unless we can demonstrate compelling grounds as to why the processing should continue in accordance with data protection laws; and for direct marketing purposes.

Request the transfer of your data to a third party. In certain circumstances you can ask us to send your data to a third party.

Right to withdraw consent. If you have provided your consent to the processing of your data for a specific purpose, you have the right to withdraw your consent for that specific purpose at any time. This would not affect the validity of the processing prior to such date. Once we receive the notification that you have withdrawn your consent, we will no longer process your data for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so by law.

Please note that by exercising this right it is possible that the BSH will no longer be able to continue to provide its services to you.

How do you exercise your rights?

You can make a request by contacting the BSH in a number of ways set out below. We may ask you to confirm your request in writing. You will not have to pay a fee to exercise any of your rights. However, we may charge a reasonable administration fee, or not comply with a request, if a request is clearly unfounded, excessive or repetitive so as to be deemed vexatious.

We may need to request specific information from you to help us confirm your identity and to ensure your right to access the information (or to exercise any of your other rights). This is another appropriate security measure to ensure that personal data is not disclosed to any person who has no right to receive it.

12. What if you have queries about this Privacy Policy or the way the BSH uses your personal data?

If you wish to exercise your rights, or if you have any questions about this Privacy Policy, or how we handle your data, or if you wish to make a complaint, please send an email to info@bsh.org.uk, or write to BSH Secretariat, "Nought", The Farthings, Marcham, Oxfordshire OX13 6QD, or call the BSH on 01865 391836, Monday to Friday between 9.30am and 5.30pm (excluding Bank Holidays).

13. Right to Complain

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO) who is the UK supervisory authority for data protection issues. The ICO's contact details are: Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF, telephone: 0303 123 1113, email: <https://ico.org.uk/>.

14. Changes to this Privacy Policy.

BSH reserves the right to update this Privacy Policy at any time, and we will notify you if we make any substantial updates. We may also notify you in other ways from time to time about the processing of your personal data.