

The General Service Board of Alcoholics Anonymous (Great Britain) Limited Privacy Notice Updated May 2018

What is the purpose of this document?

The General Service Board of Alcoholics Anonymous is committed to protecting the privacy and security of your personal information.

This privacy notice describes how we collect and use personal information about you during and after your relationship with us, in accordance with the General Data Protection Regulation (GDPR).

It applies to all members, trustees, employees and professional contacts.

The General Service Board of Alcoholics Anonymous is a "data controller". This means that we are responsible for deciding how we hold and use personal information about you. We are required under data protection legislation to notify you of the information contained in this privacy notice.

This notice applies to current and former members, trustees and employees. This notice does not form part of any contract with you. We may update this notice at any time.

It is important that you read this notice, together with any other privacy notice we may provide on specific occasions when we are collecting or processing personal information about you, so that you are aware of how and why we are using such information.

Data protection principles

We will comply with data protection law. This says that the personal information we hold about you must be:

1. Used lawfully, fairly and in a transparent way.
2. Collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes.
3. Relevant to the purposes we have told you about and limited only to those purposes.
4. Accurate and kept up to date.
5. Kept only as long as necessary for the purposes we have told you about.
6. Kept securely.

The kind of information we hold about you

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

There are "special categories" of more sensitive personal data which require a higher level of protection.

We will collect, store, and use the following categories of personal information about you:

Identity Data – includes first name, surname, title, date of birth and gender.

Contact Data – includes postal address, email address, emergency contact details and telephone numbers.

Financial Data – includes bank account details, records of orders and gift aid declarations.

Communications Data – includes your preferences in receiving emails and letters from us and your communication preferences.

How we use particularly sensitive personal information

"Special categories" of particularly sensitive personal information require higher levels of protection. We need to have further justification for collecting, storing and using this type of personal information.

One special category of personal data relates to physical and mental health conditions.

As an assumption may be made that members of the Fellowship of Alcoholics Anonymous are suffering from alcoholism all personal data held is considered special category data.

The General Service Board of Alcoholics Anonymous (Great Britain) Limited may process this data in the course of its legitimate activities and will not disclose any personal data outside of the charity without the consent of the data's owner.

How is your personal information collected?

We collect personal information about members, trustees, employees and professional contacts through emails, letters, registration forms, application forms, telephone calls and also through forms submitted via our website.

Basis for processing of personal information

Purpose/Activity	Type of Data	Lawful basis for processing including basis of legitimate interest
To maintain a record of groups, officers at region and intergroup, sub-committee members.	a) Identity b) Contact c) Financial d) Communications	Necessary for our legitimate interests in ensuring group information is up to date and for keeping in touch with members.
To maintain a record of attendees at service events.	a) Identity b) Contact c) Communications	Necessary for our legitimate interests in ensuring that we can organise our events in a safe and effective manner.
To process contributions including the administration of gift aid declarations and holding onto that information as required.	a) Identity b) Contact c) Financial	a) Necessary for our legitimate interests in ensuring that the fellowship is adequately funded and accountable. b) Necessary to comply with a legal obligation.
To keep the fellowship informed of activities and services through email communications.	a) Identity b) Contact c) Communications	Necessary for our legitimate interests to share the work of the fellowship.
To keep the fellowship informed of activities and services through postal communications.	a) Identity b) Contact c) Communications	Necessary for our legitimate interests to share the work of the fellowship.
To support and manage our employees and trustees including where necessary sharing information with payroll providers and public authorities (such as HMRC and the Charity Commission).	a) Identity b) Contact c) Financial	a) Necessary in order to comply with a legal obligation b) Performance of a contract with you. c) Necessary for our legitimate interests in ensuring staff are paid and managed effectively.

To keep professionals informed of public events and the work of Alcoholics Anonymous.	a) Identity b) Contact c) Communications	Consent – which may be withdrawn at any time by contacting the Office Manager at the General Service Office.
To keep an archive of the fellowship of Alcoholics Anonymous in Great Britain.	a) Identity b) Contact	Necessary for our legitimate interests to record the history of the fellowship.

Some of the above grounds for processing will overlap and there may be several grounds which justify our use of your personal information.

If you fail to provide personal information

If you fail to provide certain information when requested, we may not be able to keep in touch with you and/or fulfil our charity and/or legal requirements.

Change of purpose

We will only use your personal information for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If we need to use your personal information for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal information without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

Data sharing

We may have to share your data with third parties, including third-party service providers and other entities in the group.

We require third parties to respect the security of your data and to treat it in accordance with the law.

We may transfer your personal information outside the EU.

If we do, you can expect a similar degree of protection in respect of your personal information.

Why might you share my personal information with third parties?

We will share your personal information with third parties where required by law, where it is necessary to administer the employer's relationship (staff only) with you or where we have another legitimate interest in doing so.

Which third-party service providers process my personal information?

"Third parties" includes third-party service providers (including contractors and designated agents) and other entities within our group. The following activities are carried out by third-party service providers:

- Payroll (staff only)
- Auditors (trustees and staff only)
- Pension providers (staff only)

How secure is my information with third-party service providers and other entities in our group?

All our third-party service providers and other entities in the group are required to take appropriate security measures to protect your personal information in line with our policies. We do not allow our third-party service providers to use your personal data for their own purposes. We only permit them to process your personal data for specified purposes and in accordance with our instructions.

What about other third parties?

We may share your personal information with other third parties, for example in the context of printing of directories. We may also need to share your personal information with a regulator or to otherwise comply with the law.

Data security

We have put in place measures to protect the security of your information including the encryption of all office and trustee emails. Further details of these measures are available upon request.

Third parties will only process your personal information on our instructions and where they have agreed to treat the information confidentially and to keep it secure.

We have put in place appropriate security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal information to those employees and other third parties who have a business need to know. They will only process your personal information on our instructions and they are subject to a duty of confidentiality. Details of these measures may be obtained from the Office Manager at the General Service Office.

We have 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.

Data retention

How long will you use my information for?

We will only retain your personal information for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements. Details of retention periods for different aspects of your personal information are available in our retention policy which is available from the Office Manager at the General Service Office. To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

In some circumstances we may anonymise your personal information so that it can no longer be associated with you, in which case we may use such information without further notice to you. We will retain and securely destroy your personal information in accordance with our data retention policy and/or applicable laws and regulations.

Rights of access, correction, erasure, and restriction

Your duty to inform us of changes

It is important that the personal information we hold about you is accurate and current. Please keep us informed if your personal information changes during your working relationship with us.

Your rights in connection with personal information

Under certain circumstances, by law you have the right to:

Request access to your personal information (commonly known as a "data subject access request"). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.

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

Request erasure of your personal information. This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal information where you have exercised your right to object to processing (see below).

Object to processing of your personal information where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground. You also have the right to object where we are processing your personal information for direct marketing purposes.

Request the restriction of processing of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.

Request the transfer of your personal information to another party.

If you want to review, verify, correct or request erasure of your personal information, object to the processing of your personal data, or request that we transfer a copy of your personal information to another party, please contact the Office Manager at the General Service Office in writing.

You will not have to pay a fee to access your personal information (or to exercise any of the other rights). However, we may charge a reasonable fee if your request for access is clearly unfounded or excessive. Alternatively, we may refuse to comply with the request in such circumstances.

What we may need from you

We may need to request specific information from you to help us confirm your identity and 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 information is not disclosed to any person who has no right to receive it.

Right to withdraw consent

In the limited circumstances where you may have provided your consent to the collection, processing and transfer of your personal information for a specific purpose, you have the right to withdraw your consent for that specific processing at any time. To withdraw your consent, please contact the Office Manager at the General Service Office. Once we have received notification that you have withdrawn your consent, we will no longer process your information for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so in law.

Changes to this privacy notice

We reserve the right to update this privacy notice at any time, and we will provide you with a new privacy notice when we make any substantial updates. We may also notify you in other ways from time to time about the processing of your personal information.

If you have any questions about this privacy notice

If you have any questions about this privacy notice or how we handle your personal information, please contact the Office Manager at the General Service Office. You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues.

General Service Office
PO Box 1
10 Toft Green
York
YO1 7NJ

aainformation@gsogb.org.uk

01904 644026