**GUILD OF FREEMEN OF THE CITY OF LONDON**

**PRIVACY POLICY**

**Introduction**. The General Data Protection Regulation (GDPR) (EU) 2016/679 is a regulation in EU law on data protection and privacy for all individuals within the European Union. It also addresses the export of personal data outside the EU. Organisations are required to have a Privacy Policy (also known as a Privacy Notice or statement) that sets out:

* what data is collected,
* how it is processed,
* the legal basis for processing the data:
* the rights of individuals
* how to complain

The Guild of Freemen holds personal data about our employees, members and their guests, and some members of the public e.g when they order Guild merchandise. This policy sets out how we seek to protect personal data and ensure that staff understand the rules governing their use of personal data to which they have access in the course of their work.

**Privacy Policy**

The Guild of Freemen of the City of London collects personal information (e.g. name, address, email, telephone number, gender, date of birth, occupation, bank account details) when you communicate with us. This may be in the form of emails, letters, phone calls and the completion of forms (electronic or otherwise). We use personal information to contact you by post, telephone or email, but we will never sell or disclose any information you provide to us to any third party other than for the purpose for which it was collected. Your electronic information is held on a secure server and access to our electronic data is password protected. Paper records are also kept by the Guild Office. Third party recipients of names and addresses are companies that the Guild uses to print and distribute its communications such as The Freeman, Annual General Meeting papers and the Master’s Programme of Events and caterers for Guild events.

The Guild of Freemen of the City of London is the data controller; the Clerk is the data processor.

The Guild of Freemen of the City of London is a membership organisation and as such has a legitimate interest in processing members' information for purposes connected to the Guild. The processing of personal data for direct marketing purposes may be regarded as carried out for a legitimate interest and is of benefit to members e.g. to send members information about the Guild such as The Freeman journal, AGM papers, Master’s newsletter, the Master’s Programme of Events, additional events through the year and availability of places. We will use members’ information to process membership subscriptions, to seek payment for events and merchandise and to ensure dietary requirements are known by caterers at Guild events.

Please note that our photographer will be taking photos at the events, and the images will be used on the Guild’s website, social media and in the Freemen journal. If you or your guests do not wish to be photographed or have images published you should let the photographer and us know on each occasion.

The Guild has a legitimate interest for marketing activities if we can show the use of people’s data is proportionate and has a minimal privacy impact and that people would not be surprised or likely to object and if we don’t need consent under PECR. The very nature of the Guild as a membership organisation is for the purpose of "charity, benevolence, education and social activities". Members have joined the Guild for those purposes so by joining they have opted in to receive information about events from us - they have subscribed to a service that the Guild provides. We will email and send information by post to members from time to time as matters of interest arise.

If you object to this processing you may ask for your personal data to be removed from the marketing list at any time by emailing clerk@guild-freemen-london.co.uk or telephoning 0207 239 9016.

You have the right to seek confirmation as to whether or not personal data concerning you is being processed, and, where that is the case, access the personal data (*Article 15 of the REGULATION (EU) 2016/679)*. Contact clerk@guild-freemen-london.co.uk or telephone 0207 239 9016.

We will retain and archive member information for historical research purposes by the Guild. You have the right to ask us to erase data that we hold about you. Contact clerk@guild-freemen-london.co.uk or telephone 0207 239 9016.

If you have any concerns about the way The Guild handles your personal information contact clerk@guild-freemen-london.co.uk. If The Guild is unable to resolve your information rights concerns you can raise your concern with the Information Commissioner’s Office <https://ico.org.uk/concerns>

Updates to this policy will be posted to the Guild’s website <https://www.guild-freemen-london.co.uk/assets/files/Legal%20Notices%2018%2004%2018.pdf>