NATIONAL LIBERAL CLUB - PRIVACY NOTICE

This privacy notice will explain how we use your personal data and your rights regarding that information. It applies to information we collect about:

- Visitors to our website
- People who join the Club as members
- People who visit the club as a guest of a member
- People who visit the Club as a reciprocal member, or guest of a reciprocal member
- People who make an enquiry/book our conference and banqueting facilities
- People who make an enquiry about membership
- People who make a dining reservation
- People who contact us via social media or via our Website or other digital channels

Part 1 - What information are we collecting and processing?

We are collecting and processing different elements of data depending on your interaction with NLC.

Members

We are collecting and processing your name, address, email, date of birth, financial data and relevant membership info.

- Why are we collecting your data?

To provide you with information about your membership and NLC activities.

- How are we processing and using this data?

Your name, date of birth, financial and contact information will be stored in a secure database (CRM System) and will be used to send you communications about your membership and NLC activities only. The Member's Online Portal also retains card information from direct debits, and when a member has purchased tickets for events. Members can delete their card data from the Member Portal at any time. Some financial transaction data will be stored so that we can maintain appropriate financial records to be compliant with Companies Act 2006.

- What is the legal basis for processing this data?

We process this data based on your consent. You consent by submitting your data through the

membership application process and updating your membership profile on the Club website at

<u>www.nlc.org.uk</u> or the NLC Member App. You can withdraw your consent at any time by emailing us at <u>membership@nlc.org.uk</u>

We store your name, date of birth, and contact details on our finance and CRM database so that we can maintain appropriate financial records to be compliant with Companies Act 2006.

We may request proof of ID and/or age to comply with our legal obligations under our Premises License and for Financial Security checks.

- E-newsletter

We use membership data stored in our membership CRM database and email software to deliver our member e-newsletters.

Members are asked to supply a current email address when joining the Club or renewing their

membership, and it is this email address that is used to communicate news, events and information about the Club. If you do not wish to receive this, you are able to opt out at any time by emailing us at membership@nlc.org.uk

We gather statistics around email opening and clicks using industry standard technologies to help us monitor and improve our e-newsletters and target our marketing more effectively. If you send us a private or direct message via social media the message will be stored by the

relevant platform provider. We will not share these messages publicly or with any other organisations without permission.

- Are we sharing your data with others and who are we sharing it with?

We do not share your information outside of our organisation and associated systems or use it for purposes other than the ones above.

- How long will we keep your data for?

We will keep your data for seven years or until you opt out, whatever comes first, after which we will delete it securely. Some appropriate financial records will be retained to be compliant with Companies Act 2006.

Members & Non-Members

- Visitors to our Website

When someone visits www.nlc.org.uk we use a third-party service, Google Analytics, to collect

standard internet log information and details of visitor behaviour patterns. We do this to find out

things such as the number of visitors to the various parts of the site. This information is only processed in a way which does not identify anyone. We do not make, and do not allow Google

to make, any attempt to find out the identities of those visiting our website. If we do want to collect personally identifiable information through our website, we will be up front about this. We will make it clear when we collect personal information and will explain what we intend to do with it.

- Use of Cookies

Cookies are used to improve your experience when visiting our website.

A cookie is a small file of letters and numbers that is downloaded on to your computer when you

visit a website. Cookies are used by many websites and can do a number of things, e.g. remembering your preferences, recording what you have put in your shopping basket, and counting the number of people looking at a website. For further information on managing and blocking cookies <u>www.ico.org.uk/for-the-public/online/cookies/</u>

- Member Guest Data

The National Liberal Club is committed to processing members' guest data in a transparent manner.

In accordance with the National Liberal Club Premises License, we are required to keep a list of visitors to the Club. Membership guest data is stored in hard copy files and electronically on our CRM database software. Guests of members must provide their name and, on occasion, location of where they are visiting from, i.e. 'London'. The data may then be used to contact the member regarding their visit. This data is not used for any other purpose.

- Reciprocal Member Data

In accordance with the National Liberal Club Premises License, we are required to keep a list of visitors to the Club. Reciprocal membership data is stored in hard copy files and electronically on our CRM database software. Reciprocal members must provide their name, email address, and detail of their affiliated Club. The data may then be used to contact the reciprocal member, or their club, regarding their visit and Club activities. This data is not used for any other purpose.

- Reciprocal Member Guest Data

In accordance with the National Liberal Club Premises License, we are required to keep a list of visitors to the Club. Reciprocal member guest data is stored in hard copy files and electronically on our CRM database software. Reciprocal members must provide the name of any guests visiting the club. The data may then be used to contact the reciprocal member, or their club, regarding their visit. This data is not used for any other purpose.

- Event Enquiries/Bookings

Enquiry data by email or telephone is stored securely by the conference & banqueting team for

the purpose of future event bookings.

- Event Booking Data

When booking a meeting or banqueting room at the Club, your booking details will be securely stored in our CRM database to ensure ease of booking next time you visit us.

We record your name, email address and telephone number for the purpose of taking your events booking.

If you sign up via our website using a 'Guest Account' you will also join our events newsletter where you will receive an email at least once a month keeping you up to date about events at the National Liberal Club that are available to attend for guests. You can unsubscribe at any time.

- Dining Room Booking Data

When booking a table at the Club, your details will be stored in our CRM database, our online table booking platform to enable your booking and ensure ease of booking next time

you visit.

- People who email or message us, or receive emails from us

We will monitor any emails sent to us, including file attachments, for viruses or malicious software. Please be aware that you have a responsibility to ensure that any email you send is

within the bounds of the law.

We gather statistics around email opening and clicks using industry standard technologies to help us monitor and improve our e-newsletters and target our marketing more effectively. If you send us a private or direct message via social media the message will be stored by the

relevant platform provider. We will not share these messages publicly or with any other organisations without permission.

Part 2 - Data Sharing & Disclosure

In certain circumstances, it is appropriate that the Club shares or discloses personal data. Where possible and appropriate, the data subject's consent will be sought prior to any sharing

or disclosure.

Personal data will only be shared without the subject's consent in the following circumstances:

- In the vital interests of the data subject or another person.
- Where the subject lacks capacity and the data is being shared with a legal guardian.
- Under court order or for the purposes of prevention or detection of crime.
- Seeking legal advice or representation.
- For the purposes of providing a confidential reference in the interests of the data subject.
- In order to comply with a legal obligation.

Records of all data sharing and disclosures, data sharing requests, the conditions for sharing or

disclosure, and the outcomes of such activities, are maintained by the National Liberal Club.

-Information Security

GDPR states that organisations must ensure 'appropriate security of personal data, including

protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures'. With continual changes to both technology and the demand for ever-easier ways by which information can be accessed and shared, it is important that a consistent approach be adopted to safeguard information.

The National Liberal Club will ensure that appropriate technical and organisational measures are in place, supported by privacy impact and risk assessments, to ensure a high level of security for members' personal and confidential data, and a secure environment for information

held both manually and electronically.

- Records Management

Records management refers to a set of activities required for systematically controlling the creation, distribution, use, maintenance, and disposition of recorded information maintained as

evidence of business activities and transactions.

Good records management practises ensure not only record quality, but that personal data is only kept for as long as necessary for its original purpose and help support data minimisation.

The National Liberal Club is committed to implementing robust records management policy, process and practises to ensure compliance with the UK GDPR & Data Protection Act 2018.

Part 3 - Your Rights

Under the Data Protection Act 1998, you have rights as an individual which you can exercise in

relation to the information we hold about you. You can also get further information on:

- Agreements we have with other organisations for sharing information
- Our instructions to staff on how to collect, use and delete personal data
- How we check that the information we hold is accurate and up to date

- Access to personal information

The National Liberal Club tries to be as open as it can be in terms of giving people access to their personal information. Individuals can find out if we hold any personal information by making a 'subject access request' under the UK GDPR & Data Protection Act 2018. If we do hold information about you, we will:

- Give you a description of it
- Tell you why we are holding it
- Tell you who it could be disclosed to
- Let you have a copy of the information

To make a request to the National Liberal Club for any personal information we may hold you need to put the request in writing addressing it to our Membership team, or in writing to the address provided below.

If you agree, we will try to deal with your request informally, for example by providing you with

the specific information you need over the telephone.

If we do hold information about you, you can ask us to correct any mistakes by, once again, contacting the Membership team.

- Complaints or queries

The National Liberal Club tries to meet the highest standards when collecting and using personal information. For this reason, we take any complaints we receive about this very seriously. We would also welcome any suggestions for improving our procedures. This privacy notice was drafted with brevity and clarity in mind. It does not provide exhaustive

detail of all aspects of the National Liberal Club's collection and use of personal information. However, we are happy to provide any additional information or explanation needed. Any requests for this should be sent to the address below.

If you want to make a complaint about the way we have processed your personal information,

you can contact us at the address below.

- Links to other websites

This privacy notice does not cover the links within this site linking to other websites. We therefore, encourage you to read the privacy statements on the other websites you visit.

- Changes to this privacy notice

We keep our privacy notice under regular review. This privacy notice was last updated on 02/12/2024

- How to contact us

If you want to request information about our privacy policy or report a data breach, you can email us or write to:

Membership Secretary National Liberal Club Whitehall Place London SW1A 2HE

Email: membership@nlc.org.uk

Telephone: 020 7930 9871

www.nlc.org.uk