



# PRIVACY NOTICE FOR ARC CUSTOMERS

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In accordance with the General Data Protection Regulation (GDPR), we have implemented this privacy notice to inform you of the types of data we process about you. We also include within this notice the reasons for processing your data, the lawful basis that permits us to process it, how long we keep your data for and your rights regarding your data.

The EU General Data Protection Regulation (GDPR) includes rules on giving privacy information to data subjects in Articles 12, 13 and 14. These are more detailed and specific than in the Data Protection Act and place an emphasis on making privacy notices more transparent, and accessible.

A privacy notice is supplied to any individual at the time they provide us with their personal data. The GDPR says that the information we provide to people about how we process their personal data must be:

- concise, transparent, intelligible and easily accessible;
- written in clear and plain language; and
- free of charge.

This Notice explains when and why we collect personal information about our members, how we use it and how we keep it secure and your rights in relation to it.

We may collect, use and store your personal data, as described in this Data Privacy Notice and as described when we collect data from you.

We reserve the right to amend this Data Privacy Notice from time to time without prior notice. You are advised to check our website <http://www.arcwebonline.co.uk> regularly for any amendments.

We will always comply with the General Data Protection Regulation (**GDPR**) when dealing with your personal data. Further details on the GDPR can be found at the website for the Information Commissioner (<http://www.ico.gov.uk>). For the purposes of the GDPR, we will be the “controller” of all personal data we hold about you.

## Identity and contact details of the Data Controller

ARC is the Data Controller and is committed to protecting the rights of individuals in line with the Data Protection Act 1998 (DPA) and the new General Data Protection Regulation (GDPR).

## Contact details of the Data Protection Officer

**ARC has a Data Protection Officer who can be contacted via email:**

[andrew.botros@arcwebonline.co.uk](mailto:andrew.botros@arcwebonline.co.uk)

## What information do we collect about you?

The GDPR defines **personal data** as the following:

'Any information relating to an identified or identifiable natural person ('data subject'); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person;' Personal data relating to ARC Users or ARC Users institutions can include: name, job title, work address, work telephone number, email address.

'**Special categories**' of personal data (sensitive personal data) relate to racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic data, biometric data, data concerning health or data concerning sexual orientation. Special category data relating to members can include: racial and ethnic origin, religion, health records etc.

## We collect and process the following data from you

| Type of information  | Purposes  | Legal basis of processing  |
|--|---|--|
| ARC User Name, work address, telephone numbers, professional e-mail address(es). | Managing ARC System User List for digital marketing /promotion of ARC events and notices.               | For the purposes of our legitimate interests in operating daily business.  |
| ARC User's Institution   | Managing ARC System User List processing  | Publicly available information   |
| ARC User's Occupation title  | Managing ARC System User List for Conference / event data sharing-delegate lists (consent is requested) | For the purposes of our legitimate interests in operating our daily business. Ensuring that the correct data gets to correct groups of occupation roles. |

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|--|--|--|
| ARC User's institutions' finance contact | Contact for payment of ARC Invoices            | Payment of ARC Invoices  |
| ARC User's Dietary requirements          | Conference / event data processing.            | For the purposes of our legitimate interests in operating our daily business and in making sure that we can provide sufficient and suitable facilities   |
| ARC User's access needs                  | To Cater for Disability needs at events.       | Equality Act-ARC is open to everyone and we ensure that venues we choose meet need requirements. For the purposes of our legitimate interests in making sure that we can provide sufficient and suitable facilities  |
| Written submissions ARC User's           | Conference / event/newsletter data processing. | For the purposes of our legitimate interests in operating our daily business. Consent requested for image and any text provided for any non-commercial and/or educational and/or commercial purposes in any media, including without limitation, printed and online educational and/or promotional materials |

### **How will your information be used?**

- Marketing our National Conferences and Regional events
- Administering finance/bookings for conference / event attendance
- Providing operational information
- Promoting our events
- Ensuring member's safety and security
- Posting photos of ARC events to the ARC website and social media pages.
- The data will not be used to make automated decisions.

### What is our legal basis for processing your personal data?

Please see table above for legal basis of processing your data. Further guidance on why this may be necessary can be found below. ARC may process personal data that satisfies conditions under Article 6 and Article 9.

Please see examples below:

| Article 6 - Personal Data  | Article 9 - Special Categories   |
|--|--|
| The data subject has given <b>consent</b> to the processing *  | The data subject has given <b>explicit consent</b> to the processing   |
| Processing is necessary for the performance of a <b>contract</b> with the data subject   | Processing is necessary for the purposes of carrying out the obligations of the controller or of the data subject in the field of <b>employment/honorarium</b>   |
| Processing is necessary for compliance with a <b>legal obligation</b>  | Processing is necessary to protect the <b>vital interests</b> of the data subject or of another natural person where the data subject is physically or legally incapable of giving consent               |
| Processing is necessary in order to protect the <b>vital interests</b> of the data subject or of another natural person  | Processing is carried out in the course of its legitimate activities by a foundation, association or any other <b>not-for-profit</b> body with a political, philosophical, religious or trade union aim. |
| Processing is necessary for the performance of a task carried out in the <b>public interest</b>  | Processing relates to personal data which are made <b>public</b> by the data subject   |
| <p>Processing is necessary for the purposes of the <b>legitimate interests</b> pursued by the controller or by a third party.</p> <p>This condition can only be used by ARC if processing does not fall within our core function.</p>  | Processing is necessary for the Association, exercise or defence of <b>legal claims</b> or whenever courts are acting in their judicial capacity   |
| Processing is necessary for reasons of <b>substantial public interest</b>  |  |
| Processing is necessary for the purposes of preventive or occupational medicine, for the assessment of the working capacity of the employee, medical diagnosis, the provision of <b>health or social care</b> or treatment, or the management of health or social care systems |  |
| Processing is necessary for reasons of public interest in the area of <b>public health</b>   |  |
| Processing is necessary for <b>archiving purposes</b> in the public interest, scientific or historical research purposes or statistical purposes   |  |

Please note that rules around consent are much stricter under GDPR. Consent means offering individuals genuine choice and control and requires a positive opt-in. Pre-ticked boxes and any other methods of consent by default are not lawful.

The GDPR gives individuals a specific right to withdraw consent. ARC will tell people about their right to withdraw, and offer them easy ways to withdraw consent at any time.

**\*\*In order to rely on the 'legitimate interests' condition ARC must meet certain requirements.**

The first requirement is that ARC must need to process the information for the purposes of your legitimate interests or for those of a third party to whom they disclose it.

The second requirement, once the first has been established, is that these interests must be balanced against the interests of the individual(s) concerned. The "legitimate interests" condition will not be met if the processing is unwarranted because of its prejudicial effect on the rights and freedoms, or legitimate interests, of the individual. ARC's legitimate interests do not need to be in harmony with those of the individual for the condition to be met. However, where there is a serious mismatch between competing interests, the individual's legitimate interests will come first.

More information relating to conditions for processing can be found on the ICO's website.

### **Who receives your information?**

ARC are the primary recipients of your data.

We will only disclose your data to other organisations /companies if related to an event we have convened- such as an accommodation and/or catering provider in conjunction with our conference / event.

ARC would not normally transfer your data outside of the EU. If we were needed to we would contact you and justify our reasons; giving you opportunity to withdraw from such data processing.

How long will your information be held? GDPR states that personal data must be kept 'no longer than is necessary for the purposes'

We only routinely process contact information for longer than 12 months. I.e. Dietary information etc will not be processed from previous event data captures. We will always ask you to update such information on data refresh points and new event registration.

## **What are your rights?**

You have a right to access your personal information, to object to the processing of your personal information, to rectify, to erase, to restrict and to port your personal information.

Any requests or objections should be made in writing (email is a legitimate form) to the ARC Data Protection Officer: -

Andrew Botros

ARC Technology Ltd

St Mina's House,

29a High Road

Byfleet

Surrey

KT14 7QH

Email: [Andrew.botros@arcwebonline.co.uk](mailto:Andrew.botros@arcwebonline.co.uk)

## **Security of your information**

Your data will be kept secure in a password protected spreadsheet held in a professional work cloud account (Microsoft Azure) through ARC Network.

## **How to make a complaint**

If you are unhappy with the way in which your personal data has been processed you may in the first instance contact the ARC Data Protection Officer using the contact details above.

If you remain dissatisfied then you have the right to apply directly to the Information Commissioner for a decision. The Information Commissioner can be contacted at: - Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF

[www.ico.org.uk](http://www.ico.org.uk)