

## **Privacy Notice**

### Identity and Contact Details

Leicestershire & Rutland Bee Keeping Association (LRBKA) was founded in 1882 and is a small registered charity with the objective “to preserve the honeybee, by promoting the craft of beekeeping and educating the public of the benefit of bees to the environment”.

Walnut Lodge  
Park Lane  
Walton  
LEICESTER  
Leicestershire  
LE17 5RQ

UK Charity number: 1163520

Data Protection Fee: We are a small organisation that does not process large amounts of personal data, with no CCTV usage. We believe that we are exempt from paying the fee because we are a not-for-profit organisation, an exempt purpose, and the following conditions apply,

- we are only processing data for the purposes of establishing or maintaining membership or support for a body or association not established or conducted for profit, or providing or administering activities for individuals who are members of the body or association or have regular contact with it
- we only hold information about individuals whose data we need to process for this exempt purpose
- the personal data we process is restricted to personal information that is necessary for this exempt purpose”

Data Protection Officer (DPO): For the same reasons given above, we believe we do not need to appoint a DPO at this organisation. However, we have designated an Assigned Representative.

Assigned Representative: Although we do not believe that we need to appoint a DPO, we have created the role of Assigned Representative who is a member of the organisation, normally a trustee, who will take on the responsibility for acting as the point of contact for data subjects, enquiries regarding data protection issues and for liaison with the ICO, should the need arise. Contact can be made with the Assigned Representative at the above address or through the normal contact routes given on the website, addressed to The Assigned Representative.

### Purposes for processing personal data

We process your personal data to run our organisation. The purposes for processing personal data include

- Delivery of member services (including processing of payments, newsletters, meeting notices, classes and name badges)
- Contracts with suppliers
- Recovering Gift Aid from HMRC
- Enquiries from the public and organisations regarding assistance with swarms
- Attending and running events aimed at educating the general public
- working with the appropriate authorities when there is or there is suspected of being in the area an outbreak of a notifiable disease or an infestation of an alien organism that may be detrimental to bees and beekeeping

### Lawful basis

We have examined the types of personal data we hold and the reasons for us obtaining and processing that data and believe that data and data processing falls chiefly under the following lawful basis:

- (b) Contract: the processing is necessary for a contract you have with the individual, or because they have asked you to take specific steps before entering into a contract.

For the avoidance of any doubt, we take the meaning of the term contract in its widest form, to cover all types of contract, either explicit or implicit, whether written or verbal and whether or not any financial transaction takes place. For example, where a person agrees verbally to deliver an invited presentation free of charge, we would consider there to be a contractual relationship between that person and LRBKA. As such, we would consider that we could lawfully disseminate to our membership the relevant details of the speaker under lawful basis (b) Contract.

We believe that some of our data processing also falls under lawful basis Legitimate Interest (see following section).

### Legitimate interest

Our charity objective is “to preserve the honeybee, by promoting the craft of beekeeping and educating the public of the benefit of bees to the environment”. Therefore, we have identified that the LRBKA has a legitimate interest in working with the appropriate authorities, including but not limited to the National Bee Unit, when there is or there is suspected of being in the area an outbreak of a notifiable disease or an infestation of an alien organism that may be detrimental to bees and beekeeping. We have also identified that the appropriate authorities have a legitimate interest in working with the LRBKA in this regard. We will submit to the appropriate authorities, without further reference to the members, sufficient personal details for the authorities to identify and contact the members in order to make whatever arrangements are necessary at the apiary sites used by the members to deal with the disease or infestation in the area. For the

avoidance of any doubt, the arrangements necessary for the authorities to deal with the disease or infestation in question may include the destruction of the bees and/or bee keeping equipment belonging to members. We believe that the collective interests, rights and freedoms of the bee keeping community in the area, including commercial bee keepers, outweigh those of the members individually when there is or there is suspected of being an outbreak of a notifiable disease or an infestation of an alien organism that may be detrimental to bees and beekeeping.

#### Recipients of personal data

On the whole, personal data is received by trustees and officers of the organisation, notable exceptions being HMRC, our auditors and Huddle (cloud storage). We do not pass on or sell your details to any third parties for their own commercial use.

#### Transfers to any third-countries or international organisations

Data are held on Huddle, a cloud-storage service. Huddle's Privacy Policy states that data may be stored outside the European Economic Area, but that wherever the data are stored it will take all steps reasonably necessary to ensure that the data are treated securely and in accordance with its privacy policy.

#### Retention periods

LRBKA has been in existence in one form or another since 1882. We hold an archive of the bee keeping activity within the region, extending back to our founding. We wish to continue this tradition under GDPR. Personal data will normally be held in their full form for a maximum of seven years after the expiry of use and then in a minimal form for the purposes of archiving of the bee keeping activity within the region. Data relating to trustees will be kept in its full form for up to thirty-years.

#### Rights available to data subjects

You have a number of rights under GDPR regarding your personal data that we hold and process. You have the right to know what type of data we hold on you, to see what data we hold about you and to make corrections to the data that we hold. You have a right to receive a copy of the data. You have rights in relation to automated decision making and profiling (which we do not carry out). You have the right to object to us processing your data. You have the right to instruct us to delete your data. You have the right to instruct us to restrict the processing of your data. Whilst requests regarding any of your rights can be made verbally or in writing, it would be appreciated if such requests are made in writing through the general contact channels on our website, addressed to The Assigned Representative. We are required to provide you with a response within thirty-days.

Your rights can be somewhat limited, depending upon the lawful basis under which an organisation operates. As we operate chiefly under lawful basis Contract, your rights to erase your data, restrict the processing of your data or object to the processing of your data are limited. However, we will consider a request under your right to erase your data, restrict the processing of your data or object to the processing of your data as a request to also terminate your contract with the Association, for which there will be no refund of any fees paid.

#### Right to withdraw consent.

We hold and process your personal data under lawful purposes Contract and Legitimate Interest. This means that we do not need your consent to hold and process your personal data and neither will we seek your consent. Therefore, whilst you have a right to withdraw consent, you have not given us any consent for you to withdraw.

#### Right to lodge a complaint with a supervisory authority

We would hope that if you have an issue with any way in which we hold and process your data that you would raise the issue with us in the first instance. Issues can be raised verbally or in writing, but it would be appreciated if such issues are raised in writing through the general contact channels on our website, addressed to The Assigned Representative. Nevertheless, you have the right to raise a formal complaint with the Information Commissioner's Office regarding what we do with your data, further information about which can be found at [www.ico.org.uk](http://www.ico.org.uk).

#### Statutory or contractual obligation to provide personal data

We hold and process your personal data chiefly under lawful purpose Contract. For a contract to exist with the organisation, certain personal data must be provided, the specific nature of which is to be decided by the organisation. Failure or refusal to provide the required data will result in the contract not proceeding or, in the event of an existing contractual arrangement, terminating.

#### Automated Decision-making and profiling

We do not use automated decision-making and/or profiling systems.

#### Website - [www.lrbka.org](http://www.lrbka.org)

Our website does not use cookies.

We do not store the IP address of anyone browsing our website. The only way in which we use such IP addresses is for statistical purposes, keeping a count over time of the number of people accessing our website pages. This helps us to improve our website.

The website contains links to other websites. You should be aware that

once you have clicked on such a link you will have left our website. Our GDPR policy and Privacy Notice do not extend to those other websites. You should exercise caution and investigate the privacy statement applicable to the website in question.