THE BRITISH-RUSSIAN LAW ASSOCIATION'S <u>DATA PRIVACY POLICY</u> 25 May 2018

The BRLA is committed to protecting your privacy. This privacy notice sets out the basis for which any personal data we collect from you, or that you provide to us, will be processed by us. All our policies and procedures for data management is compliant with the EU GDPR terminology.

Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it.

For the purpose of the Data Protection laws, the data controller is Rupert D'Cruz of 3 King's Bench Walk, Temple, London, EC4Y 7HR.

Legitimate Interest

We process your data when it is in our legitimate interests to do so and when these interests are not overridden by your data protection rights.

Information we collect about you

As a member or contact of ours your data will be held by the data controlled in his automated filing systems.

This may include;

- contact details (including names, employment details, postal addresses, email addresses and telephone numbers) and
- your bank details where you have used this to transfer payment for membership subscriptions, sponsorship or our AGM dinner
- other professional information you may send us about yourself (including cvs)

How your personal information is collected

Your personal information may be collected directly from you when subscribe for membership through our website or contact us directly by e-mail or provide us with your business card for the purpose of placing you on our circulation or other similar source of information about yourself through our registration process, feedback forms or by corresponding with us by phone, email or otherwise.

How we use your Personal Data

Any other information that you freely give and which may constitute sensitive information is not retained. Information given freely by yourself when applying for membership of the Association is only used for the purpose of keeping you informed about our activities and issues relating to membership of the Association. We will not share any information with 3rd parties without your consent.

Restricted us of your data

We will only use your information when it is fair and lawful to do so. Most commonly, we will use your personal information in the following circumstances:

1. Where it is necessary for our legitimate interests (or those of a third party) namely providing you with information about our events or those in which we are involved in a supporting or promotional capacity or other information about the Association, but only where your interests and fundamental rights do not override those interests.

2. Where you have given your consent and that consent has not subsequently been withdrawn by you.

We may also use your personal information in the following circumstances, which are likely to be rare:

3. Where we need to protect your interests (or someone's interests).

4. Where it is needed in the public interest.

We will retain your data on our secure data base. From time to time we may contact you to confirm whether you wish to continue using us or to confirm deletion of your personal information from our data base.

Data Subject Rights

Under certain circumstances, you have the right to:

• Access your information.

You are entitled to request access to the information we hold about you (known as a 'data subject access request'). You are entitled to receive a copy of the personal information we hold about you and to check that it is being lawfully processed.

• **Correct your information.** If the information we hold for you is incomplete or incorrect, you have the right to request a correction.

• Request erasure.

Where there are no reasons for continuing the processing of your personal information, you are able to request the removal or deletion of the personal information.

• Object to processing.

Where we relies on legitimate interest for the processing of your personal information, or for the purposes of direct marketing, you have the right to object to the processing.

• Request the restriction of processing.

You are entitled to request for a suspension for the processing of your personal information, for example, if you are awaiting the reasons for the processing of the information or require us to establish its accuracy.

• Transfer your personal information.

You are able to request the transfer of your personal information to another party.

It is important that the personal information we hold for you is accurate and up to date. If you would like 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;

No fee

These rights are available to you at no cost; however we may charge a reasonable fee where a request is deemed to be excessive or unfounded. In such circumstances, we may otherwise refuse to comply with the request.

How long is your personal data retained?

We will generally hold your personal data for a minimum of three years or for as long as is necessary for the purposes for which it was collected thereafter or whenever you tell us you no longer want to remain on our contact list. Personal information may be retained for as long as necessary to comply with our legal obligation, or in order to protect yours or another person's vital interest.

Security

We understand the importance of protecting your privacy and we will ensure your data is safeguarded and held securely in accordance with our obligations under the Data Protection laws. Appropriate technical and organisational measures have been implemented to ensure personal information is protected and to prevent your personal data from being lost, used, accessed in an unauthorised way, altered or disclosed. Details of these measures are available upon request.

We have in place procedures and a policy to deal with any potential data security breaches, data subjects and any applicable regulators will be notified where we are legally required to do so

Deletion of Data on request

You may contact us at any time to request removal of your personal information. We will action any request within 48 hours and will confirm deletion by email.

How do you know what Information we have retained

You may ask us to divulge any information we retain about you. This request should be made in writing and should include the approximate date you registered with us and must be signed by you. We will respond by email within 30 days of receiving your written request. Following your request we will either delete or make appropriate changes to your data. Please email: rdc@littletonchambers.co.uk

Complaints

If you consider that our processing of your personal information infringes the Data Protection laws, 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.

Transfer of Data

Unless explicitly requested by you in writing we will not transfer in part or whole any of your Personal Information to any other party.

Contact details

All requests should be sent to: rdc@littletonchambers.co.uk

How do we inform you of Policy Changes

We reserve the right to revise this policy or any part of it from time to time and will provide you with a new policy notice where any substantial updates are made. We may also notify you through other means, about the processing of your information.

Any policy changes due to revised legislation or business reasons will be published on our web page.