



## **Berkshire Ornithological Club**

### **General Data Protection Regulation (GDPR) – Legitimate Interests Assessment (LIA)**

Under the GDPR, the BOC has to identify the lawful basis for holding and processing personal data. This assessment documents how the BOC decided on the lawful basis and how it complies with the GDPR.

#### **Legitimate interests**

The BOC has checked that this is the most appropriate basis, for the following reasons.

- The BOC holds personal contact details for all its members for membership purposes, including communicating with members, identifying who has or has not paid subscriptions, claiming Gift Aid, providing annual reports and issuing permits. These are legitimate interests.
- The BOC would be unable to provide services to its members if it did not hold and process their contact details. Contact details are used appropriately to ensure effective communications and in the least intrusive way possible.
- Members provide their personal data voluntarily so that the Club can communicate with them. They would not otherwise be able to benefit fully from their membership of the BOC. Their individual rights do not override these legitimate interests.

#### **Holding, processing and deleting data**

The officers in the BOC who collect, hold and process personal data understand their responsibilities to protect the rights, interests and privacy of its members.

The BOC only uses individuals' personal data in ways that they would reasonably expect (as detailed above); members know that the Club uses their contact details for communications. Safeguards are in place to ensure minimal adverse impact on members. Contact details are only supplied to other officers or committee members when necessary for legitimate reasons, such as organising meetings, seeking volunteers, etc.

Personal data is never used in any way that could be intrusive or harmful to members. The Club does not provide personal data to anyone who does not have a legitimate reason for processing it; no personal data is ever provided to third parties without the explicit permission of the individuals involved.

The Club does not offer its members the option to 'opt out' as this would mean that they would not receive any communications from the BOC and therefore could not benefit fully from membership. The Club would also be unable to comply with its constitution. However, the Club will delete an individual's personal data if requested by that individual.

If a member leaves, their data is stored (but not processed) for a maximum of seven years, for financial probity and in case they return as members. During this time, the data is not processed or provided to anyone.

#### **Children's data**

Young people under 18 years old can join the BOC. We only collect and process personal data about people under 18 if we have the permission of their parent or guardian

## **Legitimate interests assessment**

This assessment provides a documented record of the decisions made by the BOC when ensuring it complies with the GDPR. The BOC committee reviews this assessment and the Club's privacy notice at least annually, and revises it as necessary, e.g. if any relevant circumstance changes.

Jane Campbell  
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Berkshire Ornithological Club