

# BRIGHTNIGHT LIMITED

## Brightnight Ltd Privacy Policy

Brightnight Ltd is registered with the Information Commissioner's Office with registration number ZA271972. Brightnight Ltd is a company limited by guarantee (number 06570440)

Brightnight Ltd collects and uses personal information about its members. This information is gathered in order to have contact details of who will be taking part in activities related to Brightnight Ltd and to keep members informed. Brightnight Ltd as data controller has to register with the Information Commissioners Office (ICO) and maintain a record of the information it holds and the purposes for which it obtains and uses the personal data. These details must be kept up to date and available for inspection by the ICO. The registration number is ZA271972.

The ICO is the body that oversees compliance with data protection legislation and has powers to force organisations to process data lawfully.

Brightnight Ltd is committed to protecting your personal information. We want your interactions with us to be safe and secure. This Privacy Policy relates to our use of any personal information we hold about you that it is being dealt with correctly and securely in line with legislation.

If you are aged 16 or under, please get your parent/guardian's permission before you provide any personal information to us.

### LAWFUL BASIS OF PROCESSING

We will have explained our legal basis for processing when we first received your personal information. If you have questions about or need further information concerning the legal basis on which we collect and use your personal information, please contact us using the contact details provided below.

### SECURITY OF YOUR INFORMATION

We take the security of your information very seriously. We use appropriate procedures and technical security measures including encryption and archiving systems to safeguard your personal information.

The information held on our membership database is:-

- Name
- Address
- Telephone and mobile numbers
- Email address
- Membership status
- Communication preference
- Donation amount

We do not hold your bank details on the membership database. Basic bank information for anyone we have made payments to is stored within our online banking system, which is accessed by password and card reader by signatories only.

If you wish to correct, update or request deletion of your personal information, you can do so at any time by contacting us using the contact details provided below and we will comply with your request. If your information is amended it is overwritten on the membership database.

# BRIGHTNIGHT LIMITED

## HOW IS YOUR PERSONAL INFORMATION USED

We use your personal information to send you newsletters by email or post; depending on how you have requested that we contact you. We will also use your information to : inform you about company meetings, its policies and rules; invite you to membership subscription renewal opportunities; invite you to other events such as social or fundraising events run by the society/company; or request your help with any of the above activities or the running of the company.

We will never sell your personal information. We do not share your personal information with any external individual or organisation. If we need to we will gain your express permission to do this first.

## HOW LONG DO WE KEEP YOUR INFORMATION?

To make sure we meet our legal data protection and privacy obligations, we only hold on to your personal information for as long as we need it for the purposes for which we collected it (see section 'How is your personal information used' above)

## RIGHT OF ERASURE

This right allows individuals to request that their personal information is deleted when there is no justification for its continued use. It only applies however when:

1. The information is no longer necessary for the reasons it was collected
2. The member provided consent for Brightnight Ltd to hold their personal information but has subsequently withdrawn that consent.
3. There is a legal requirement to erase the personal information.
4. The personal information was collected with parental consent when the member was a child. Now the child is now eligible to be an adult member and they no longer wish for their personal information to be held.

## MANAGING COMMUNICATIONS

We will enable you to stop all email and postal communications you receive from us if you no longer want to be contacted by us. Please see the 'unsubscribe' link or details we include in each email.

If you have elected to receive communication in paper form for personal information and you wish to unsubscribe please contact us by letter to the address below.

## MANAGING YOUR INFORMATION

We need to keep the information we gather about you accurate and up-to-date. Please let us know if you think any of the information we hold on you may be inaccurate.

If you would like to change your personal information details, you can contact us at any time using the details below and let us know exactly what you would like us to change. Changes can be made by email or letter.

If you wish to access, correct, update or request deletion of your personal information, you can do so at any time by contacting us using the contact details below and we will comply with your request.

You can object to us holding your personal information and ask us to delete your personal information. You can exercise these rights by using the contact details provided under below and we will comply with your request.

# BRIGHTNIGHT LIMITED

Similarly, if we have collected and process your personal information with your consent, then you can withdraw your consent at any time. Withdrawing your consent will not affect the lawfulness of any information we held prior to your withdrawal.

If you have any worries or complaints about the way we use your information, please do not hesitate to get in touch with us. We'll do our very best to set your mind at rest or put things right. And if, for whatever reason, you feel we're not meeting the exceptionally high standards we expect of ourselves, you are within your rights to tell the UK Information Commissioner's Office (ICO).

## **SUBJECT ACCESS REQUEST**

You have the right to know what data Brightnight Ltd holds that relates to you. You can make a Subject Access Request at any time by contacting us below. By making this request Brightnight is legally obliged to share all the information that we hold on you, we will respond to a data access request within 72 hours. We then have 30 days in which to fulfil the requests.

## **DISCLAIMER AND COOKIES**

With modern technology you have more and more personal control over what information we and other organisations collect. For example, you can normally delete cookies and tracking technologies sent to your web browser. You can also change related settings to restrict them, such as by using a private browsing mode (although this may affect your browsing experience on some websites). Plus, you can use the settings options in your mobile devices to restrict what sort of information websites and mobile apps are able to access and use about you. We urge you to look out for these functions and tools and use them to manage your privacy in a way that suits you best.

## **INTERNET BASED TRANSFERS**

Given that the Internet is a global environment, using it to collect and process personal data necessarily involves the transmission of data on an international basis. This means, for instance, that data you pass to us may be processed outside the European Economic Area, although the data will always be held securely and in line with the requirements of UK data protection legislation. By communicating electronically with us, you acknowledge and agree to our processing of personal data in this way.

## **WEBSITE**

When people visit the Cliffe Bonfire website, we log non-personally-identifiable information including IP address, profile information, aggregate user data, and browser type. We use this data to monitor usage and improve our website services.

## **EMAIL SUBSCRIPTION SERVICES**

You should not enter information on behalf of another person or about any other person. Your name and email address will be used only for delivering to you the services to which you have subscribed, for sending information about these services, for sending you password reminders and for validating security. They will not be provided to any third parties without your express consent.

If you are sharing your email address with other people, Brightnight Ltd cannot protect any information you provide against access by the other users of your email address, nor can Brightnight Ltd prevent other users of your email address changing your subscription details.

# BRIGHTNIGHT LIMITED

## EXTERNAL PROVIDERS WE USE FOR PERSONAL DATA

Brightnight Ltd uses a range of 3rd party processors who process personal data on behalf of Brightnight Ltd. All 3rd party processors are contractually obligated to process personal data in line with GDPR requirements.

**Marketing Emails.** Brightnight Ltd uses a third party provider, Mail Chimp, to deliver our weekly e-newsletters and other correspondence. We gather statistics around email opening and clicks using industry standard technologies. For more information, please see Mail Chimp privacy notice.

<https://mailchimp.com/legal/privacy>

**Cliffe Bonfire Website.** Brightnight Ltd uses a third party provider Wordpress as the platform for its website. For more information see Wordpress's privacy notice. <https://en-gb.wordpress.org/about/privacy>

## UPDATES TO THIS PRIVACY POLICY

We will need to update this policy from time to time. Whenever we make material changes, we will tell you in advance in the ECN if we hold your email address; we will also inform you of any changes in the Cliffe Clarion.

## CONTACT US

You are welcome to get in touch with us to discuss your information at any time.

Email: [membership@cliffebonfire.com](mailto:membership@cliffebonfire.com)

Registered address: 5 Waite Close, Lewes BN7 2QW

Thank you very much for taking the time to read this policy.

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