



**INFORMATION POLICY AND PRIVACY NOTICE
OF THE
ARTILLERY CLERKS' ASSOCIATION**



Edition Number 1
Adopted by the Association Committee – December 2024

ARTILLERY CLERKS' ASSOCIATION INFORMATION POLICY AND PRIVACY NOTICE

PRIVACY NOTICE

1. The Data Protection Act 1998 has been replaced by the General Data Protection Regulation (GDPR) and the Data Protection Act 2018, which govern how personal data is collected, stored, and processed. As an organisation that handles personal data, the Artillery Clerks' Association is committed to complying with these regulations and ensuring the privacy and security of all individuals' personal information.
2. This Information Policy and Privacy Notice outlines our legal obligations under GDPR and explains how we collect, use, and protect your personal data. It also provides transparency on the specific ways we process personal data and your rights in relation to that data.
3. Under GDPR, we are required to process personal data in a manner that is:
 - **Fair:** We will handle your data with integrity and transparency, informing you about its use.
 - **Lawful:** We will only process personal data when we have a legitimate basis for doing so, in compliance with the law.
 - **Transparent:** We will provide clear, accessible information about how your personal data is used and processed.
 - **For specified and lawful purposes:** Your data will only be used for purposes that are clearly stated at the time of collection.
 - **Data minimisation:** We will ensure that only data that is necessary for the specified purpose is collected and processed.
 - **Accuracy:** We will take steps to ensure that the data we hold is accurate and up to date.
 - **Storage limitation:** We will not keep your personal data for longer than necessary.
 - **Integrity and confidentiality:** We will ensure your data is processed securely, protected from unauthorised access, and kept confidential.
4. We will not use your data for any purpose other than what it was originally collected for unless we have Lawful Basis to do so¹.
5. If we need to update or correct any personal data, we will make sure to do so promptly and transparently.

¹ For example: Consent, Legitimate interests, Legal obligation. <https://ico.org.uk/for-organisations/uk-gdpr-guidance-and-resources/lawful-basis/a-guide-to-lawful-basis/>

How We Use Your Information

6. When you provide personal data to the Artillery Clerks' Association, whether by signing up for membership or through other means, this section explains how we use, store, and protect that data. It also outlines why we request certain information, how we may share it, and what rights you have regarding your data.
7. To achieve our Association and charitable objects, and to support both our members and beneficiaries, the Artillery Clerks' Association processes a variety of personal data. Some of this processing is necessary to meet our legal obligations, while other uses are based on your consent or our legitimate interests as an Association and as a charity. We will ensure that your data is only used in ways that are relevant and necessary for these purposes.
8. In accordance with GDPR, we will process your personal data for the following reasons:
 - **Charitable and Regimental Purposes:** We use your data to communicate with you about charity and regimental events, including details of welfare support, member activities, and updates on regimental matters.
 - **Legal Obligations:** Certain activities may require us to process data in order to fulfil legal duties or obligations (e.g., compliance with regulations, financial reporting, etc.).
 - **Legitimate Interests:** Where applicable, we may process your data for purposes that align with the legitimate interests of the Association, such as improving member engagement, supporting the regimental community, and ensuring the efficient operation of the Association.

Sensitive Data:

9. We will not process sensitive or special categories of personal data (such as health information or racial/ethnic data) without your explicit consent and/or appropriate lawful bases for processing. If we need to process such sensitive data, we will inform you of the Lawful Bases we are using before doing so.

Fundraising:

10. We will only contact you directly about fundraising activities with your explicit consent (specified on the attached form at Annex B). Should you choose to participate in any fundraising activities, we will ensure that your information is used responsibly and in accordance with GDPR.

Data Sharing:

11. We may share your personal data with third parties in certain circumstances, such as with trusted service providers, regulatory authorities, or partners directly involved in our charitable activities. Any data sharing will always be in accordance with GDPR requirements and will be limited to what is necessary.

Why We Ask for Your Personal Information

12. The Artillery Clerks' Association requests your personal information in order to effectively support our members and ensure that we can keep you informed about relevant events and activities. We use the information you provide for the following purposes:
 - **Association and Regimental Events:** To keep you updated on upcoming events, activities, and news related to the Association and the regimental community.

- **Connecting with Old Friends:** To assist in reconnecting you with former colleagues and members who may be trying to reach out.
 - **Welfare Support:** To provide you with support if you require assistance, particularly in relation to welfare services.
13. By consenting to the Association holding your personal information, you enable us to administer your membership, process subscriptions, and ensure you receive timely information about future Gunner events and activities.
 14. If you are comfortable with us holding and using your information for these purposes, we kindly ask you to complete the attached form at Annex B, which will allow us to process your details in accordance with GDPR.

The Data we Hold within the Association.

15. Information assets identified in an audit conducted in December 2024, which include, or may at times include personal information, are listed separately at Annexure A to this policy document.

Who Is Your Data Shared With?

16. Where there is a legitimate requirement the personal data we collect may be shared with organisations within the Royal Regiment of Artillery (RHQ RA) and other entities that fall under the umbrella of Royal Artillery Charities and funds. These organisations include:
 - The Royal Artillery Charitable Fund (210202)
 - The Royal Artillery Institution (245882)
 - The Royal Artillery Association (238197)
 - The Royal Artillery Benevolent Fund (210202-19)
 - The Royal Artillery General Charitable Trust (275558)
 - The Central Sergeants' Mess
17. These organisations are dedicated to supporting you and your dependants throughout your service and retirement. They offer a range of events, publications, and subscriptions that may be of interest to you.
18. If you choose to subscribe to any of the publications offered by these organisations, your contact details (such as your address) will be provided to the relevant publishers solely for the purpose of delivering the publication to you. We have a strict agreement with these publishers to ensure that your information is handled securely and is only retained by them for as long as necessary to distribute the publication. Once the publication is delivered, your personal data is securely disposed of by the publisher.
19. We are committed to ensuring that any data shared with these organisations is protected and processed in accordance with GDPR.

How We Store Your Information

20. The personal information you provide to the Artillery Clerks' Association is securely stored on a local hard drive, located within a desktop computer. This hard drive is managed solely by the Secretary of the Artillery Clerks' Association and is used exclusively for the purposes outlined in this policy.
21. The hard drive is fully managed, and we have implemented strict procedures and policies to ensure that your information is protected from misuse or unauthorised access. The following measures are in place to comply with GDPR and to safeguard the confidentiality, integrity, and security of your personal data.
 - **Password Protection:** The hard drive is protected by a bespoke password, which is a unique and complex passphrase that is only routinely held by the Association Secretary so that he can undertake his responsibilities. The password is regularly updated to ensure ongoing protection against unauthorised access and an emergency copy is held securely off site.
 - **Access Control:** Access to the hard drive is strictly limited to the Association Secretary or in case of emergency the Chair of the Association.
 - **Physical Security:** The hard drive is securely housed and properly protected, with measures in place to prevent unauthorised access, theft, or damage.
22. We are committed to taking all necessary steps to protect your information, including access controls and regular reviews of our data protection policies.

How Long We Keep Your Information For

23. We retain your personal information in accordance with the retention policies set by the Royal Artillery Association (RAA), the Artillery Clerks' Association overarching governing body.
 - **Membership Data:** If you have a membership subscription and pay annually, we will retain your personal data for as long as you continue to subscribe. Should you cease subscribing, we will retain your data for a period of 6 years, in line with legal and regulatory requirements. During this time, we will not use your data for any purpose other than what it was originally collected for, unless we have Lawful Basis for doing so.
 - **Event-Related Contact:** If you have given consent for us to contact you about future events or activities, we will retain your information for this purpose for as long as we have a legitimate reason to do so or until you choose to withdraw your consent. You may withdraw your consent at any time, and upon doing so, we will promptly remove your information from our records.
24. We are committed to ensuring that your data is only retained for as long as necessary for the purposes for which it was collected.

Your Rights

25. As a data subject, you have the following rights under GDPR:
 - **Right to Access:** You have the right to request a copy of the personal data we hold about you. To exercise this right, please submit a **Subject Access Request (SAR)** in writing to the Secretary of the Artillery Clerks' Association using the contact details below.
 - **Right to Rectification:** If any of the personal data we hold about you is inaccurate or incomplete, you can request that it be corrected or updated.

- **Right to Deletion:** You may also request that your personal data be deleted from our records at any time. To do so, please contact the Secretary in writing. You should be aware that deletion of your data may have an impact on your continued membership of the Association or the services that the Association provide to you. This will be explained in more details should you request the deletion of your data.

26. For any of the above requests or for further information regarding your data, please contact:

Secretary of the Artillery Clerks' Association

Email: **Secretary@artyclerkassn.org**

27. The return address for the form at Annex B is via email at **Secretary@artyclerkassn.org**

The Data we Hold within the Association.

1. Information assets identified in a audit conducted in December 2024, which include, or may at times include personal information, are listed below:
 - The Association Members' Postal Address and Contact List.
 - The Association E Mail Address List.
 - The Association Website.
 - The Association Magazine – The Crossed Quills.
 - The records held by the Association Secretary.
 - The records held by the Association Treasurer, Association Reunion Secretary, Association Welfare Officer & Association Historical Secretary.
 - The Minutes and Correspondence held by the Association Secretary.
2. The Association Members' Postal Address and Contact List is managed by the Secretary and is reviewed at least annually, sometimes more frequently. It consists of a database of the last known postal address of Association members.
3. The Association E Mail Address List provides the Secretary with an efficient Email communication route with Officers and members of the Association.
4. The Association Website potentially contains the following personal information:
 - The Name and Office of members of the Association Committee.
 - The names of recently deceased members of the Association with date of death
 - May from time-to-time name Association members celebrating Anniversaries, Promotions and Honours and Awards.
5. The Association Magazine (The Crossed Quills) is published and circulated to Members annually and potentially contains the following personal information:
 - The Name and Office of members of the Association Committee and the Name of potential Members.
 - The names of recently deceased members of the Association with date of death.
 - May from time-to-time name Association members celebrating Anniversaries, Promotions and Honours and Awards.
 - Photographs on past events of a historical nature (including Reunions, Ceremonial, Team photographs, etc.)
6. The records held by the Association Secretary, Treasurer, Association Reunion Secretary & Association Historical Secretary may include Personal Information provided by Members on Membership Application Forms, Bank Standing Orders, Gift Aid Mandates, Individual Reunion Returns and associated attendance spreadsheets, Historical Returns, Welfare reports/referrals.

7. The information held by the Association Welfare Officer is minimal and restricted to what is required to keep the Association Committee apprised of any known welfare issues of individuals within the Association. This information may consist of a list of ongoing welfare cases which records the name of the member and a short description of the issue, restricting the details to a very 'broad brush' description in order to avoid specifics. The information is kept secure via a combination of passwords, passcodes, facial and fingerprint recognition. The details are reviewed regularly and weeded/deleted once no longer required.

8. The Minutes and Correspondence of the Association may, from time to time, mention individuals by name and also include some personal information about named individuals, Prospective members, past members who may, or have not, held office within the Association and of Widows.

ARTILLERY CLERKS' ASSOCIATION DATABASE CONSENT FORM

Annex B

Please complete this form in **Black or Blue Ink**

PERSONAL DETAILS

Title		Initials		Surname	
First Name				Middle Name	
Preferred Name				Date of Birth (dd mm yyyy)	
Spouse/Partner's Name				Post Nominals	

Note: Please include academic qualifications and professional memberships (i.e. MBE, BSc, MIET)

Address Line 1					
Town/City					
County			Post Code		
Country (if not UK)					
Email Address					
Telephone Number			Mobile Number		

SERVICE DETAILS

Rank		Service Number	
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The Artillery Clerks' Association database holds personal information in order for the Association to provide support for its serving and retired members and their dependants. Some of this data we process on the basis of Legitimate Interest as described in our privacy notice. We may use the information to contact you about Association and regimental events, process requests for welfare support and other related regimental activity including helping Gunners to keep in contact with old friends. The Artillery Clerks' Association data is shared between these related Gunner organisations in order to conduct its business. The Artillery Clerks' Association is legally bound by the Data Protection Act to ensure that any data it holds on individuals is relevant, accurate and not excessive. Additionally, it must be fairly and lawfully processed, held for defined purposes, be accurate and up to date, not kept for longer than necessary, processed in line with your rights and must be secure. We will ensure that all data held on our database is treated in accordance with these principles. We will not sell or misuse any personal data and we do not intend to contact you too often; we merely need your formal agreement for us to use your data to establish routine correspondence, if required. You can withdraw your consent at any time by writing or emailing Secretary@artyclerkassn.org

The Artillery Clerks' Association Secretary may hold my personal data and process it in order to

Events/News/Updates	YES	NO
<ul style="list-style-type: none"> Contact me if any other fellow Gunner is trying to get in touch (e.g. reunions) 		
Artillery Clerks' Association Membership		
<ul style="list-style-type: none"> You can contact me via Email 		
<ul style="list-style-type: none"> You can contact me via Telephone 		
<ul style="list-style-type: none"> You can contact me via Letter 		
Fundraising		
<ul style="list-style-type: none"> Contact me about RAA or Association Fundraising initiatives/activities 		
Signature:		Date: