



THE BRITISH ASSOCIATION
OF THE SOVEREIGN MILITARY HOSPITALLER ORDER OF MALTA

Privacy Statement

The Association of British Members of the Sovereign Military Hospitaller Order of Malta (“BASMOM”) is a charity registered in England and Wales with charity number 1103567. Its registered address is 13 Deodar Road, London, SW15 2NP.

This Privacy Statement should be read carefully to understand how BASMOM collects, uses and stores the personal data

BASMOM is committed to protecting the privacy of its members and all other parties whose details it is from time to time made privy to (“Affiliates”). When Affiliates interact with BASMOM by phone, mail, in person or online, BASMOM receives personal information. This Privacy Statement tells Affiliates about how BASMOM collects, uses and stores Affiliates’ personal information. If Affiliates have any queries about this Privacy Statement, BASMOM should be contacted at DPO@orderofmalta.org.uk.

BASMOM’s Privacy Statement takes into account several legal instruments, including:

- the Privacy and Electronic Communications (EC Directive) Regulations 2003 as amended by The Privacy and Electronic Communications (EC Directive) (Amendment) Regulations 2011 (and any subsequent legislation)
- the General Data Protection Regulation (“GDPR”), which takes effect in the UK from 25th May 2018.

How BASMOM collects information about Affiliates

BASMOM may collect and store information about Affiliates whenever they interact with BASMOM. For example, when Affiliates become a member, volunteer with BASMOM, join BASMOM as a hospital guest on its activities,

make a donation, buy a ticket to an event or products such as Christmas card and books, receive an award or medal or otherwise give BASMOM any other personal information.

BASMOM may also receive information about Affiliates from other parties, such as Justgiving, for a specific purpose – but only if Affiliates have given them permission to share their information.

BASMOM may also collect information through cookies on its website.

What information BASMOM may collect

When Affiliates interact with BASMOM, it may ask Affiliates to give it their names, addresses, email addresses, telephone numbers and other personal information (including, for example: information in relation to Affiliates' health where relevant; passport details where necessary; travel insurance details; occupation; and next-of-kin details). Affiliates' dates of birth and relevant medical information will only be collected if appropriate, for example to register as a volunteer or guest. BASMOM may also ask for details relating to donations, gift aid and other payments where these are necessary.

The Order of Malta website also collects information, which can include Affiliates' IP addresses, browsers, domain names and access times.

How BASMOM uses Affiliates' information

BASMOM will collect data from Affiliates for the

- Administration of membership(s)
- Management of Affiliates' participation as volunteers or guests during its activities
- Fulfilment of orders for goods and services requested
- Administration of donations and legacies
- Research and statistical analysis
- Communication about membership, events, fundraising and other activities that BASMOM think may be of interest to Affiliates
- Complying with its administrative duties, financial regulations and the law

Personal details collected in this way will only be used to provide BASMOM with information it would reasonably expect or to which Affiliates have agreed to, in accordance with this Privacy Statement.

BASMOM promises to comply with its duties under the legislation to keep Affiliates' details secure. BASMOM will only share them with suppliers or professional agents working on its behalf. For events run in conjunction with other Order of Malta organisations internationally, such as the International Holiday Camps, BASMOM will share details with them only as required for managing Affiliates' participation in these events.

When BASMOM receive Affiliates' data, BASMOM will store them in our Cloud database. This database may only be accessed by certain volunteers or employees and always via a secure password.

Volunteers or employees may be given access to Affiliates' data on the Cloud, as necessary, to enable Affiliates' participation in the activities of BASMOM. For example, medical volunteers and the volunteers responsible for Affiliates' particular group may be given access to their personal medical details to ensure their safety and enjoyment of activities with BASMOM.

When Affiliates take part in retreats, pilgrimages and holiday camps, it may be necessary for BASMOM to print off copies of their personal information (including medical information) for the purpose of taking this information with it on location and ensuring that it is available for consultation, again for Affiliates' health and safety. When BASMOM does this, it will ensure that any such documents are stored securely and are accessible only to appropriate volunteers or employees who require this information. BASMOM may also transport Affiliates' information in encrypted form on a device, such as a memory stick or laptop, where necessary.

BASMOM may use the details Affiliates give it to contact them, unless they ask it not to. BASMOM will contact Affiliates to provide information about future activities in which they could participate or about fundraising opportunities. If Affiliates have given BASMOM their postal addresses, email addresses or phone numbers and would prefer not to be contacted by these means, they can email BASMOM at DPO@orderofmalta.org.uk.

BASMOM may also use Affiliates' details (where relevant) to print in the annual Nominal Roll, circulated only to other members of BASMOM.

Affiliates' consent

The legal basis on which BASMOM relies for processing Affiliates' data will be at least one of the following:

- Affiliates have provided their consent to BASMOM using their data in a certain way.
- Such processing is necessary for BASMOM to comply with a legal obligation to which BASMOM is subject.

- It is in BASMOM's legitimate interests to process Affiliates' data, e.g. in order to administer Affiliates' membership, process donations and administer the charity, provided this is not unwarranted by reason of prejudice to them. (BASMOM's legitimate interest in such cases is to raise funds in pursuance of its charitable purposes. When BASMOM processes personal information for its legitimate interests, BASMOM makes sure that BASMOM considers and balances any potential impact on Affiliates, both positive and negative, and their rights under data protection laws. BASMOM will not use Affiliates' personal data for activities where its interests are overridden by the impact on them unless BASMOM has their consent or is otherwise required or permitted to by law.)

By giving Affiliates' personal information, including sensitive personal data such as information about their health, Affiliates consent to BASMOM collecting and using that information in the ways that BASMOM describes in this Privacy Statement and/or in other ways to which they have specifically consented.

Transfer

Affiliates also consent to BASMOM transferring their information, if necessary for any of the above purposes, to countries or jurisdictions which may not provide the same level of data protection as the UK. This may include, for example, their participation in international Order of Malta activities outside the EEA, such as the International Holiday Camps. If BASMOM does transfer their information in this way, BASMOM will comply with its legal obligations as a data controller under GDPR; and BASMOM will put in place a contract with any company BASMOM uses to process information to ensure that Affiliates' details are properly protected.

BASMOM may allow consultants and/or external providers acting on its behalf to access and use Affiliates' information for the purposes for which they have provided it to BASMOM (e.g. to deliver mailings, to analyse data and to process payments). BASMOM will only provide them with the information they need to deliver the relevant service; and BASMOM will make sure Affiliates' information is treated with the same level of care as if BASMOM were handling it directly.

BASMOM will not share, sell or rent Affiliates' information with/to third parties for marketing purposes.

Marketing Consent

BASMOM will only send Affiliates marketing information by e-mail, SMS/text, post or phone if they have given it specific consent. BASMOM will contact Affiliates for the following purposes: to give them information about forthcoming events and activities, or to support the work of BASMOM. If Affiliates withdraw their consent and then subsequently opt in, then their most recent preference may supersede such withdrawal. BASMOM will not contact Affiliates if they list their names and telephone number(s) with the Telephone Preference Service.

Affiliates can opt out of BASMOM using their personal details for marketing at any time by emailing DPO@orderofmalta.org.uk.

How BASMOM protects Affiliates' personal information

BASMOM aims to take appropriate physical, electronic and managerial measures to ensure that BASMOM keeps Affiliates' information secure, accurate and up to date and that BASMOM only keeps it as long as is reasonable and necessary.

Although BASMOM uses appropriate security measures, once BASMOM has received Affiliates' personal information the transmission of information over the internet is never completely secure. BASMOM does its best to protect personal information. BASMOM cannot, however, guarantee the security of information transmitted to the Order of Malta website. Therefore any transmission is at the user's own risk. An exception to this is that credit card details sent to the Order of Malta website which are passed securely to its payment processing partner, in accordance with the Payment Card Industry Security Standards.

BASMOM encourages Affiliates to review the privacy statements of any websites to which they connect from the BASMOM website so that they can understand how those sites collect, use and share their information. BASMOM is not responsible for the privacy statements or other content on sites beyond the Order of Malta website.

How long BASMOM keeps Affiliates' data

BASMOM will keep Affiliates' personal data for no longer than is necessary for the purposes for which it is processed.

If Affiliates ask BASMOM not to contact them any more, BASMOM will keep some basic information about them on its suppression list in order to avoid sending them unwanted materials in the future.

Affiliates' credit card information

If Affiliates use their credit cards to donate to BASMOM, buy something from BASMOM or make a booking via the Order of Malta website, BASMOM may pass Affiliates' credit card details securely to its payment processing partner as part of the payment process. BASMOM does this in accordance with the Payment Card Industry Security Standards. BASMOM does not store any credit card details on the website.

Membership

BASMOM will continue to hold where relevant personal information for the duration of Affiliates' membership of BASMOM and following their death, resignation or expulsion such data will be securely archived.

Volunteering

If Affiliates apply for a volunteering opportunity with BASMOM, BASMOM will use the information they give it to assess their suitability for the role. If BASMOM wants to disclose information about Affiliates to someone outside BASMOM, BASMOM will make sure BASMOM tells them beforehand, unless BASMOM is required to disclose this information by law.

BASMOM will hold Affiliates' personal information for 36 months after the volunteering opportunity they have applied for. After this date BASMOM will destroy or delete Affiliates information.

BASMOM Archive

BASMOM holds an archive which records members and guest and volunteer attendance at its activities. This helps BASMOM maintain an historical record, and provides aggregate data about its members, volunteer and guest profiles. All data are stored securely. Only the Chancellor, the BASMOM Secretary and the BASMOM Archivist have access; and any personally identifiable information is released only at the request of the data subject himself/herself.

How to find out what personal information BASMOM hold about Affiliates

Affiliates can request details of the personal information BASMOM holds about them under the GDPR. If Affiliates would like a copy of the information BASMOM holds on them, in the first instance they should email BASMOM at

DPO@orderofmalta.org.uk - or write to the Data Protection Officer of BASMOM at 13 Deodar Road, London SW15 2NP.

How to change the personal information BASMOM hold about Affiliates

If Affiliates want to update the information BASMOM hold for them or if they think any information BASMOM holds about them is incorrect or incomplete or if they wish BASMOM to delete the information that BASMOM holds about them, they should get in touch as soon as possible. They can contact BASMOM at: DPO@orderofmalta.org.uk - or by writing to the Data Protection Officer of BASMOM at 13 Deodar Road, London SW15 2NP.

Affiliates should let BASMOM know if they have any queries or concerns about the way that their data are being processed by contacting BASMOM as above. They are also entitled to make a complaint to the Information Commissioner's Office. For further information see the Information Commissioner's guidance at <https://ico.org.uk/for-the-public/personal-information>.

This Privacy Statement may change from time to time. Affiliates should check this page occasionally to see if BASMOM has included any updates or changes and that they are happy with them.

February 2018