



SOVEREIGN MILITARY HOSPITALLER ORDER  
OF ST JOHN OF JERUSALEM OF RHODES AND OF MALTA

GRAND PRIORY OF ENGLAND AND ASSOCIATION OF BRITISH MEMBERS

## Unified Privacy Statement

### Introduction

This statement is jointly adopted by:

- 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; and
- The Grand Priory of England and the Grand Priory of the Blessed Adrian Fortescue of the Order of Malta Trust (“GPE”) a charity registered in England and Wales with charity number 1166645. Their address is 67 Castletown Rd, London W14 9HG.

The statement explains how BASMOM and the GPE collect, use and store data.

BASMOM and the GPE are committed to protecting the privacy of their members and all other persons whose details they may from time to time make privy to (“Members and Affiliates”). When Members and Affiliates interact with BASMOM and the GPE by phone, mail, in person or online, BASMOM and the GPE may receive personal information. This Privacy Statement tells Members and Affiliates how BASMOM and the GPE collect, use and store Members and Affiliates’ personal information. If Members and Affiliates have any queries about this Privacy Statement, BASMOM and the GPE should be contacted at [DPO@orderofmalta.org.uk](mailto:DPO@orderofmalta.org.uk)

This Privacy Statement is intended to accord with all applicable legal requirements, including those contained in:

- the UK General Data Protection Regulations (“GDPR”);
- the Data Protection Act 2018.

### How BASMOM and the GPE collect information about Members and Affiliates

23 GOLDEN SQUARE - LONDON - W1F 9JP  
EMAIL: MC@GPESMOM.ORG

*The Grand Priory of Blessed Adrian Fortescue of the Order of Malta  
Trusts a UK registered charity, no. 1166645*

CRAIGMYLE HOUSE - 13 DEODAR ROAD - LONDON - SW15 2NP  
TEL: 020 7286 1414 - EMAIL: BASMOM@ORDEROFMALTA.ORG.UK

*The Association of British Members is a UK registered charity, no.  
1103567*

BASMOM and the GPE may collect and store information about Members and Affiliates whenever they interact with BASMOM or the GPE. For example, when Members and Affiliates become a member, volunteer, join as a hospital guest on activities, make a donation, buy a ticket to an event or products such as Christmas cards and books, receive an award or medal or otherwise give any other personal information.

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

BASMOM and the GPE may also collect information through cookies on their websites.

### **What information BASMOM and the GPE may collect**

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

The respective websites of BASMOM and GPE also collect information, which can include Members and Affiliates' IP addresses, browsers, emails and access times.

### **How BASMOM and the GPE use Members and Affiliates' information**

BASMOM and the GPE will collect data from Members and Affiliates for the following purposes:

- Administration of membership(s)
- Management of Members and Affiliates' participation as participants or volunteers or guests during its activities
- Fulfilment of orders for goods and services requested
- Administration of donations and legacies

- Research and statistical analysis, for example via cookies
- Communication about membership, events, fundraising and other activities that BASMOM and the GPE think may be of interest to Members and Affiliates
- Complying with administrative duties, financial regulations and the law
- Maintaining the archive pertaining to BASMOM and the GPE

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

BASMOM and the GPE promise to comply with its duties under the legislation to keep Members and Affiliates' details secure. BASMOM and the GPE will only share them with suppliers or professional agents working on their behalf. For the records of and events run with other Order of Malta organisations internationally, such as the Grand Magistry, and the International Holiday Camps..

When BASMOM and the GPE receive Members and Affiliates' data, BASMOM and GPE will store hard copies in a secure, locked location and soft copies on our secure computer systems. These systems may only be accessed by certain members, volunteers or employees and always via a secure password.

Members, volunteers or employees may be given access to Members and Affiliates' data as necessary to enable Members and Affiliates' participation in the activities of BASMOM and the GPE. For example, medical practitioners and the volunteers responsible for Members and Affiliates' participation in activities with BASMOM and the GPE for safety reasons.

When Members and Affiliates take part in retreats, pilgrimages and holiday camps, it may be necessary for BASMOM and the GPE to carry printed copies of personal information (including medical information) for the purpose of ensuring that it is available for consultation for Members and Affiliates' health and safety. When BASMOM and the GPE do this, they will ensure that any such documents are stored securely and accessible only to appropriate members, volunteers or employees who require this information. Where necessary, BASMOM and the GPE may also transport Members and Affiliates' information in encrypted form on a device, such as a memory stick or laptop, which will be stored securely.

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

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

### **Members and Affiliates' consent**

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

- Members and Affiliates have provided their consent to BASMOM and the GPE using their data in a certain way.
- Such processing is necessary for BASMOM or the GPE to comply with a legal obligation to which BASMOM or the GPE are subject
- It is in BASMOM or the GPE's legitimate interests to process Members and Affiliates' data, e.g. in order to administer Members and Affiliates' membership, process donations and administer the charity activities, provided this is not unwarranted by reason of prejudice to them. (BASMOM and the GPE's legitimate interest in such cases is to administer membership and/or raise funds in pursuance of their charitable purposes. When BASMOM and the GPE process personal information for their legitimate interests, BASMOM and the GPE make sure they consider and balance any potential impact on Affiliates, both positive and negative, and their rights under data protection laws. BASMOM and the GPE will not use Affiliates' personal data for activities where BASMOM and the GPE's interests are overridden by the impact on Affiliates unless BASMOM and the GPE have Members and Affiliates' consent or are otherwise required or permitted to by law.)

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

## **Transfer**

Members and Affiliates also consent to BASMOM and the GPE transferring their information, if reasonably 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 or the GPE transfer Members and Affiliates' information in this way, BASMOM and the GPE will comply with their legal obligations as a data controller under GDPR; and put in place a contractual relationship to process information to ensure Members and Affiliates' details are properly protected.

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

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

## **BASMOM and the GPE Marketing Consent**

BASMOM and the GPE will only send Affiliates marketing information by e-mail, SMS/text, post or phone if they have given it specific consent. BASMOM and the GPE will contact Members and Affiliates for the following purposes: to give them information about forthcoming events and activities, or to support the work of BASMOM and/or the GPE. If Members and Affiliates withdraw their consent and then subsequently opt in, then their most recent preference may supersede such withdrawal.

Members and Affiliates can opt out of BASMOM or the GPE using their personal details for marketing at any time by emailing [DPO@orderofmalta.org.uk](mailto:DPO@orderofmalta.org.uk).

## **How BASMOM and the GPE protect Members and Affiliates' personal information**

BASMOM and the GPE take appropriate physical, electronic and managerial measures to ensure that they keep Members and Affiliates' information secure, accurate and up to date and that they only keep it as long as is reasonable and necessary.

Although BASMOM and the GPE use appropriate security measures, once BASMOM and the GPE have received Members and Affiliates' personal information the transmission of information over the internet is never completely secure. BASMOM and the GPE do their best to protect personal information. BASMOM and the GPE cannot, however, guarantee the security of information transmitted to their websites. Therefore any transmission is at the user's own risk. An exception to this is that credit card details sent to their websites which are passed securely to its payment processing partner, in accordance with [the Payment Card Industry Security Standards](#).

BASMOM and the GPE encourage Members and Affiliates to review the privacy statements of any websites to which they connect from their websites so that they can understand how those sites collect, use and share their information.

BASMOM and the GPE are not responsible for the privacy statements or other content on sites beyond their own websites.

## **How long BASMOM and the GPE keep Members and Affiliates' data**

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

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

## **Members and Affiliates' credit card information**

If Members and Affiliates use their credit cards to donate to BASMOM or the GPE, buy something

from BASMOM or the GPE, or make a booking via their websites, BASMOM or the GPE may pass Members and Affiliates' credit card details securely to its payment processing partner as part of the payment process. BASMOM and the GPE do this in accordance with the Payment Card Industry Security Standards. BASMOM and the GPE do not store any credit card details on their websites.

## **Membership**

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

## **Volunteering**

If Members and Affiliates apply for a volunteering opportunity with BASMOM or the GPE, BASMOM or the GPE will use the information they give it to assess their suitability for the role. If BASMOM or the GPE want to disclose information about Members and Affiliates to someone outside BASMOM or the GPE, BASMOM and the GPE will make sure they tell Members and Affiliates beforehand, unless BASMOM and the GPE are required to disclose this information by law.

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

## **BASMOM and the GPE Archives**

BASMOM and the GPE hold archives which record members', guests' and volunteers' attendance at its activities. This helps BASMOM and the GPE maintain historical records, and provides aggregate data about members, volunteers and guest profiles. All data are stored securely. Only the Chancellor of BASMOM, the Chancellor of the GPE, the BASMOM Secretary and the BASMOM Archivist have access; and any personally identifiable information stored in the Archives is released only at the request of the data subject himself/herself.

## **How to find out what personal information BASMOM and the GPE hold about Members and Affiliates**

Members and Affiliates can request details of the personal information BASMOM and the GPE holds about them under the GDPR. If Members and Affiliates would like a copy of the information BASMOM and the GPE hold on them, in the first instance they should email BASMOM at [DPO@orderofmalta.org.uk](mailto: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 and the GPE hold about Members and Affiliates**

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

Members and Affiliates should let BASMOM and the GPE know if they have any queries or concerns about the way that their data are being processed by contacting BASMOM and the GPE 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. Members and Affiliates should check this page occasionally to see if BASMOM or the GPE have included any updates or changes and that they are happy with them.

Adopted by BASMOM Council	2018
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