



67a Reading Road

Pangbourne

Berkshire RG8 7JD

Tel: 0118 984 4005

Email: enquiries@policesupers.com

Privacy Notice – last reviewed 19.10.22

Police Superintendents' Association

This privacy notice provides information about the personal information we process as a data controller in compliance with the General Data Protection Regulation (GDPR). GDPR will apply from 25th May 2018. The following provides information as to how we use your data and what rights the GDPR gives you in respect of your data.

What personal data do we process?

The personal data we process include:

- Contact details including date of birth, home address, work and personal contact details, gender, ethnicity, religion and belief, marital status, disability, working arrangements, qualifications and education, sexual orientation and service details (employment, date joined the service and the PSA)
- Financial details, but limited to bank account details necessary for the collection of subscriptions to the PSA.
- Health information - Medical details (physical and mental health) but only in cases where the PSA is supporting you, examples being ill health pension retirements or applications for injury awards.
- Legal and discipline information where the PSA is representing or advising you. This may include legal communications which will be subject to legal privilege.
- Employment cases or issues where the PSA is providing advice, including the provision of legal advice.
- We also hold personal data relating to the employees of the PSA pursuant to their contract of employment.

Whom do we collect it from

We collect information about you from the following sources:

- Directly from you
- From a third party acting on our joint behalf e.g. a lawyer or insurance broker re LPI
- From other organisations e.g. forces

Why do the PSA process personal data and what is the legal basis for doing so?

- We process the personal data of members in order to support and represent in accordance with our role as a Police staff association.
- The processing of any special category personal information, such as health records or information concerning race, ethnic origin, sex, sexual orientation are processed lawfully since they come within the associations exemption at Article 9 (2) (d) namely processing is carried out in the course of our activities, with appropriate safeguards, and the processing relates solely to our members or former members and personal data is not disclosed outside the PSA without the consent of the data subject.

- We also hold personal data pursuant to the individual's consent given when an individual joins the PSA. Where consent has been given, it may be withdrawn at any time by contacting the Assistant Secretary at National Office who has day to day responsibility for the Association's data protection.

How we will use your information

We will use your personal details in order to confirm your identity and address, to confirm membership of the PSA and in order to deal with issues, such as ensuring adequate legal and professional support is provided to you and to deal with any pay, pensions, or conditions of service issues.

We will also use your data in order to best represent you and the wider membership in connection with diversity, equality and educational qualifications.

Whom do we share personal data with?

We share personal data internally strictly on a need to know basis.

Special category data held electronically is encrypted and access is restricted. Hard copy personal data is stored securely with restricted access.

We do not share personal data with anyone external to the Association other than the following and only with your consent:

- Professional advisors including lawyers
- Healthcare, social and welfare organisations
- Insurance providers (e.g. Legal Protection Insurance)

The PSA utilises external companies for IT Support such as maintaining our membership database and other systems, support providers are subject to a duty of confidentiality and are aware of their responsibilities under GDPR.

Retention of Data – How long does the PSA keep personal data for?

We generally keep personal data indefinitely so as to confirm membership should we need to represent you. The PSA has a retention policy and will only retain data that is relevant and necessary. When you retire from the service your PSA file is weeded and only essential information is retained. Banking information (direct debit details) is deleted.

Transferring your information overseas

Our core systems, data and administration services are all carried out and stored within the UK, this includes our membership database. Other data (emails) may be transferred and stored within the European Economic Area (EEA). No data is stored outside the EEA.

Your Rights

We are committed to protecting your rights to privacy. They include:

- Right to be informed about what we do with your personal data
- Right to have a copy of all the personal information we process about you
- Right to rectification of any inaccurate data we process, and to add to the information we hold about you if it is incomplete
- Right to be forgotten and your personal data destroyed

- Right to restrict the processing of your personal data
- Right to object to the processing we carry out based on our legitimate interest

Personal data that is covered by legal professional privilege, and personal data that we process so as to obtain legal advice or representation may fall outside these rights. In other words, we may not be able to accede to data subject requests concerning these categories of data.

Further information and complaints

If you wish to make a complaint about how we have handled your personal information, please contact the Assistant National Secretary who is the Association's data protection lead. You may also contact the Information Commissioner's Office on 0303 123 1113