

WHITCHURCH BRIDGE COMPANY

PRIVACY POLICY

1. Introduction

- 1.1 The Whitchurch Bridge Company (“we” or “our”) complies with the General Data Protection Regulation (GDPR) in relation to the personal data we hold. For the purposes of GDPR our Data Controller is Geoff Weir, Company Secretary
- 1.2 This Privacy Policy explains how we use any personal data collected about you. It applies to the information we collect about:
- visitors to our web site;
 - registered Bridge Card holders
 - employees and applicants for employment

2. Visitors to our website

- 2.1 You can browse our website without needing to tell us who you are or reveal any information about yourself. We do not attempt to identify those visiting our website.
- 2.2 If you post a message on our Message Board, your name and email address (if you choose to give one) as entered by you will be visible on our website. We will use this information only for the purposes of responding to your message.
- 2.3 Our website does not use cookies.
- 2.4 We collect anonymous information about visitors to our website e.g. IP address, browser type, pages visited. We use it to administer our website and for purposes such as troubleshooting, testing, security and statistical analyses.

3 Registered Bridge Card holders

- 3.1 When you purchase a Bridge Cards you may voluntarily register your name, address and email/mobile details with us for the following purposes only:
- to return your Bridge Card deposit to you should you return your Bridge Card (in good condition) for any reason
 - to stop your Bridge Card if you tell us it has been lost
 - to compile non-personalised statistical data on Bridge usage
 - to help investigate payment or usage queries from you
- 3.2 This data is securely stored in both paper form and digitally on a passworded database and is used for the purposes stated in para 3.1 only. It will not be disclosed to any third party for marketing or other purposes.
- 3.3 Any Bridge Card holder may request to see the information we hold about them by writing to us at our Registered Office below. We will amend or delete the information as requested and will confirm in writing when this has been done.
- 3.4 If you return your Bridge Card we will securely destroy your paper registration form and delete your details from the record of the Bridge Card you returned.

4 Holders of Concessionary Free Bridge Cards for the Disabled

- 4.1 All holders of Concessionary Free Bridge Cards for the Disabled must be registered. The provisions of section 3 apply.
- 4.2 When you apply for a Concessionary Free Bridge Card for the Disabled we will securely store your paper Registration Form and evidence of eligibility
- 4.3 If/when you return your Concessionary Free Bridge Card for the Disabled we will securely destroy your paper registration form and evidence of eligibility.

5 Frequent User Scheme (FUS)

- 5.1 All holders of Bridge Cards in the FUS must be registered. The provisions of section 3 apply.
- 5.2 When you join the FUS we securely store your original Application Form and a copy of your Bank Standing Order mandate – the original is sent to your Bank.
- 5.3 If/when you leave the FUS we will securely destroy your original Application Form and our copy of your Bank Standing Order mandate.

6 Employees

- 6.1 When you apply to work for us we will only use the information you give on your Application Form to process your application. We may disclose information to a third party when we want to take up a reference listed on their Application Form.
- 6.2 We may securely retain Application Forms from unsuccessful applicants for up to 1 year in case a suitable vacancy occurs.
- 6.3 When you take up employment with us we will create a file relating to your employment. Personal data as required by HMRC (eg date of birth, NI number) is held in a secure, passworded payroll software system on a passworded standalone desktop. We do not hold any “special categories” of personal information as defined by the GDPR, such as ethnic origin or sexual orientation.
- 6.4 Hard copy payroll reports containing personal information are securely stored for 6 years for audit and HMRC purposes.
- 6.5 We will only disclose personal information we hold on our employees in the following circumstances:
 - when requested by bodies with the necessary statutory powers such as the Police or the Department for Works and Pensions.
 - when setting up those employees to whom we must offer an auto-enrolment pension with our pension provider (NEST).
- 6.6 Any employee or unsuccessful job applicant may request to see the information held about them by writing to us at our Registered Office below. We will amend or delete the information as requested (subject to the requirements of HMRC and other statutory bodies for employer and payroll purposes) and will confirm in writing when this has been done.

7 Disclosure of Information

7.1 We will not disclose any personal information we hold on users of our website or registered Bridge Card holders to third parties for marketing or other purposes. However we may be obliged to hand over such information if requested by bodies with the necessary statutory powers such as the Police.

7.2 If you think we may hold personal information about yourself you may request to see it by writing to us at our Registered Office below. We will amend or delete it if you so request in writing. We will respond in writing to all requests and confirm when your request has been complied with.

8 Breach of Personal Data

8.1 If we become aware of a breach of personal data, or of an event such as theft or computer hack which may lead to a breach of personal data, we will act immediately to contain the breach and to notify those who may be affected.

Geoff Weir
Company Secretary
28th April 2018