

## ANNEX A

### WORSHIPFUL COMPANNY OF CUTLERS PRIVACY NOTICE - MEMBERS & PROSPECTIVE MEMBERS

1. **Our Intent.** We are committed to safeguarding the privacy of our members. The Company will only use the information that we collect about you lawfully and in accordance with the Data Protection Act 1998 (the "Act").
2. **Changes to Data Protection Legislation.** Data Protection legislation and the Act is currently going through a period of change. The introduction of the European Union's General Data Protection Regulation (GDPR) and the new British Data Protection Bill, that will replace the Act and is currently passing through Parliament is the basis of this change. This Privacy Notice is therefore intended to comply with the Act and GDPR but may change over time.
3. **Members' & Prospective Members' Terms & Conditions.** This Privacy Notice forms part of Terms & Conditions for being a member or prospective member of the Company. In legal terms, members are "Data Subjects," i.e. "you." However, we may also under this collect personal information regarding your spouse and dependents if appropriate.
4. **The Data Controller.** The Worshipful Company of Cutlers (to be known as the 'Cutlers' Company' or 'the Company'...) are from a legal perspective classed as the 'Data Controller.'
5. **Data Protection Officer (DPO).** The Cutlers' Company DPO is the Clerk. The Cutlers' Company DPO fulfils a number of roles, one of which is to be the primary and independent point of contact for data protection matters. The formal mechanism for members to raise concerns regarding the processing of personal data is primarily to email: [clerk@cutlerslondon.co.uk](mailto:clerk@cutlerslondon.co.uk); or send a letter by registered mail to: Cutlers' Hall, Warwick Lane, London EC4M 7BR at which point the inquiry will be actioned. However, verbal enquiries from guests will treated appropriately by Company staff members, although a written follow up may be requested if appropriate.
6. **Purpose of Processing Personal Data.** We collect personal data primarily to support our fellowship programme, support the City and the Lord Mayor and raise money and support charitable works.
7. **Lawful Basis of Processing Personal Data.** The lawful basis of, processing your personal data are as follows:
  - a. **Consent.** Once you have agreed to this Privacy Notice of our Terms & Conditions, you will be registered for the processing of your personal data, based upon your Consent.
  - b. **Categories of Personal Data Processed.** The information we hold should be accurate and up-to-date. The personal information which we hold will be held securely in accordance with our internal data protection and security policies. The type or categories of personal data we will collect about you includes your:
    - 1) Name.
    - 2) Postal address.
    - 3) Email address.
    - 4) Mobile, and/or landline number.
    - 5) Other information (as indicated on the Company Membership Application Form).

If you apply for further roles or appointments within the Company, we may request further information and retain additional records, such as interview notes. Equally minutes of meetings and records of decisions may include your name and other information about you.

8. **Category of Recipients of Personal Data.** Your name and contact details will primarily only be used internally within the Company, the Cutlers' General Charitable Trust and The Cutlers' Surgical Award Fund. However, if you participate in a dinner or charitable outreach activity, we will normally have to provide your name and possibly other details to other stakeholders and we will ensure that these 3<sup>rd</sup> parties are also compliant with GDPR legislation.

9. **Transfer of Personal Data Outside the EEA (European Economic Area).** Personal data will only be transferred outside the EEA or other areas of adequacy determined by the EU, for specific events. If this is required, consent will be explicitly requested from you.

10. **Sensitive Personal Data.** We will never collect sensitive personal data about you without your explicit consent and a clear explanation why it is required.

11. **Spouse and Children Personal Data.** If we hold personal data about a member's partner, we will ask for specific permission consent from the partner for this.

12. **Sale or Passing of Personal Data to Third Parties.** We will not sell or pass your personal data to any commercial or charitable organisation.

13. **Retention of Personal Data.** We will retain your personal data as follows:

a. **Information Held Under Consent.** We will hold your information whilst you are a member of the Company. Upon leaving, we will request your consent to continuing to hold your name and relevant details to support our historical records.

b. **Data Subject's Rights.** Under the Act and in even more so under the GDPR you have a number of Rights which we have outlined below:

c. **Right of Access.** You are entitled to access your personal data so that you are aware of and can verify the lawfulness of the processing. This is achieved through the mechanism of a Subject Access Request (SAR) and you have the right to obtain:

- 1) Confirmation that your data is being processed (held)
- 2) Access to your personal data (a copy) and
- 3) Other supplementary information that corresponds to the information in this privacy notice.

14. **Fees and Timings.** Under GDPR and from 25 May 2018, this information will be provided without charge; without delay and within one month. If an extension is required or requests are considered manifestly unfounded or excessive, in particular because they are repetitive, the Company may choose to charge a reasonable fee taking into account the administrative costs of providing the information; or refuse to respond.

15. **Identify Verification.** To protect your personal data, the Cutlers Company will seek to verify your identity before releasing any information, which will normally be in electronic format.

16. **Right of Rectification.** You are entitled to have personal data rectified if it is inaccurate or incomplete. The Cutlers' Company will respond within one month of your request. In the unlikely event that The Cutlers' Company does not take action to the request for rectification, we will inform you of your rights to complain or seek judicial remedy.

17. **Right of Erasure.** You may request the deletion or removal of personal data where there is no compelling reason for its continued processing. The Right to Erasure does not provide an absolute 'right to be forgotten'. However, you do have a right to have personal data erased and to prevent processing in specific circumstances:

- a. Where the personal data is no longer necessary in relation to the purpose for which it was originally collected/processed.
- b. When you withdraw consent.
- c. When you object to the processing and there is no overriding legitimate interest for continuing the processing.

18. **Right to Restrict Processing.** Under the Act, you have a right to 'block' or suppress processing of personal data. The restriction of processing under the GDPR is similar. When processing is restricted, the Cutlers Company is permitted to store the personal data, but not further process it. In this event exactly what is held and why will be explained to you.

19. **Right to Data Portability.** You may request to obtain and reuse your personal data for your own purposes across different services. This allows you to move, copy or transfer personal data easily from one IT environment to another in a safe and secure way, without hindrance to usability. The Right to Data Portability only applies:

- a. To personal data you have provided to the Cutlers' Company.
- b. Where the processing is based on your consent or for the performance of a contract and
- c. When processing is carried out by automated means.

In these circumstances the Cutlers' Company will provide a copy of your data in CSV and/or PDF format free of charge within one month.

20. **Automated Decision Making and Profiling.** The Cutlers' Company does not employ any automated decision-making or conduct profiling of Data Subjects. However, if you have consented to be held on our Customer Relationship Management (CRM) database we may periodically send you marketing information so that you are informed of upcoming events and job opportunities. These will be automated but they do not involve automated decision-making or profiling.

21. **Agreement.** I confirm that I have read and understood this notice and that I give my permission for:

- a. The Worshipful Company of Cutlers ("the Company") to hold my personal details in its database in both paper and electronic forms.
- b. The Company to share my details with the Worshipful Company of Cutlers' General Charitable Trust and Cutlers' Surgical Award Fund.
- c. (For Liverymen) The Company to pass my name and address to the Town Clerk, City of London Corporation for inclusion in the Common Hall Register.

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Name

\_\_\_\_\_  
Date