



## Privacy Policy

**Approved: 22 July 2021**

**Next Review: January 2020**

This policy will be reviewed annually by the National Committee at the first full committee meeting of the year. This will include checking for any updates required by a change in local or national policy and legislation.

# Contents

<b>Introduction .....</b>	<b>3</b>
<b>Personal data that we process .....</b>	<b>3</b>
Purpose.....	3
Data (key elements).....	3
Basis .....	3
<b>How we use your data.....</b>	<b>5</b>
<b>When we share your data .....</b>	<b>5</b>
<b>Storing your data .....</b>	<b>6</b>
<b>How long we keep your data .....</b>	<b>6</b>
<b>Rights you have over your data .....</b>	<b>7</b>
<b>Cookies &amp; usage tracking.....</b>	<b>8</b>
<b>Modifications .....</b>	<b>8</b>
<b>Appendix 1. Website Privacy Notice Text.....</b>	<b>9</b>
<b>Appendix 2. Cookies Notification Text .....</b>	<b>10</b>
<b>Appendix 3. Conference, retreat or other event sign up Privacy Notice .</b>	<b>10</b>
<b>Appendix 4. MailChimp Events sign up Privacy Policy .....</b>	<b>11</b>

## Introduction

This Privacy Policy details how Quest deals with personal information (data) that we have collected from individuals who interact with our organisation. It explains what we collect, how we store it and how we use it. If you have any comments or questions about this policy, feel free to contact us by email at [quest@questlgbti.uk](mailto:quest@questlgbti.uk) or by post at: Data Enquiry, Quest, BM Box 2585, London WC1N 3XX. A designated officer will respond within 14 days.

The text of our Privacy Notices can be found in the appendices of this document.

It should be read in conjunction with Quest's **Data Protection Policy**.

## Personal data that we process

The following table explains the types of data we collect and the legal basis, under current data protection legislation, on which this data is processed.

Purpose	Data (key elements)	Basis
Signing up as a member	Name, address and contact details, age category, email, payment information, equal opportunities monitoring information (e.g. sexual orientation, religion, disability etc.) and demographic data (e.g. church attendance) Membership history (if any), and contact route.	<b>Contract</b> – by paying your membership fees you have entered into a contractual relationship with us to receive membership services from us. Our sign-up forms use the <b>Cognito</b> system. <b>Legitimate interest</b> – Enabling us to advocate effectively for our members using monitoring and demographic information; and helping us to know if someone has previously been a member; and how they got in touch with us so we can assess the effectiveness of our marketing. <b>Consent:</b> Additionally, as a condition for processing sensitive data, we rely upon your consent (See also Data Protection Policy).

Purpose	Data (key elements)	Basis
Signing up for events	Name, address and contact details email, phone number, accessibility information, emergency medical contact, dietary and payment information.	<b>Contract</b> – by signing up for an event, and when relevant, paying fees you have entered into a contractual relationship with Quest. Our sign-up forms use systems provided by <b>Cognito, PayPal</b> and <b>EventBrite</b> .
Subscribing to email updates about our work	Name, email	<b>Consent</b> – you have given your explicit consent
Enquiring about Quest and its work	Name, email, message	<b>Legitimate Interest</b> - it is necessary for us to read and store your message so that we can respond in the way that you would expect.
Making a donation	Name, email, address, payment information	<b>Legitimate Interest</b> - this information is necessary for us to fulfil your intention of donating money, gift aid when applicable, and your expectation of receiving a confirmation message.
Website functionality	Website activity collected through cookies	<b>Legitimate Interest</b> - it is necessary for us to store a small amount of information, usually through cookies, to deliver functionality that you would expect, such as remembering the details before you have fully completed the process. This is in conjunction with the privacy policy of our payment processor, <b>PayPal</b> and the privacy policies of <b>Cognito</b> and <b>Zapier</b> and <b>Google Workspace</b> to automate membership administration.
Expense claims	Name, address, email and bank details	<b>Legitimate Interest</b> – information necessary to process your claim

Purpose	Data (key elements)	Basis
Website, marketing, and campaigning	Photographs, video and audio recordings	<b>Consent:</b> You have given your explicit consent to use your image (photo or video) or voice

## How we use your data

We will only use your data in a manner that is appropriate considering the basis on which that data was collected, as set out in the table at the top of this policy.

For example, we may use your personal information to:

- reply to enquiries you send to us
- handle donations or other transactions that you initiate
- send you communications by your preferred method relating to our work which we think may be of interest to you and other necessary communications required under our Constitution
- advocate or campaign on behalf of members

## When we share your data

We will only pass your data to third parties in the following circumstances:

- we are required by law to share your data
- you have provided your explicit consent for us to pass data to a named third party
- we use a third party purely for the purposes of processing data on our behalf and we have in place a data processing agreement with that third party (such as through our contract with the data processor) that fulfils our legal obligations in relation to the use of third party data processors.
- The external data processors that we use are Cognito, Zapier, MailChimp, Google Workspace and Eventbrite.

In addition, we will only pass data to third parties outside of the EU where appropriate safeguards are in place as defined by Article 46 of the General Data Protection Regulation.

## **Storing your data**

When we collect your data on a form on our website that data is temporarily stored securely with / by our online form provider Cognito before transfer using Zapier to a secure Membership Database held on Quest's intranet provided by Google Workspace. The Cognito data transferred is then verified and deleted.

Some contact information, which might include but be limited to name, address, telephone and email may be stored in Google Workspace Contacts to allow Quest personnel to email, contact by phone or write to members.

Your data may also be held, depending upon your preferences and the membership services supplied, by MailChimp and Eventbrite on their online secure servers. In all cases, how they (including Cognito) store your data is covered by their own privacy policies, and in accordance with prevailing law.

Quest is a volunteer led organisation and we rely on our personnel using personal computers and other electronic devices. Quest personnel are required to process all Quest data and information within our Google Workspace Intranet on computers and other devices to ensure that we are able to ensure that your data is protected and that we can enforce appropriate security measures.

## **How long we keep your data**

We take the principles of data minimisation and removal seriously and have internal policies in place to ensure that we only ever ask for the minimum amount of data for the associated purpose and delete that data promptly once it is no longer required. In the case of membership renewals your data will be deleted from our records if you have not responded to an invitation to renew, after the next Quest AGM. If you are not a member of Quest your name and email address will be retained to let you know about future conferences, retreats or other events unless you opt out of such mailings using the option on the sign-up form. All other data will be kept for a maximum period of four

months following the Conference, retreat or other event, allowing for any necessary follow-up tasks. If you have agreed to us claiming Gift Aid on your behalf (subject to eligibility) we will keep your data as required by HMRC regulations and for at least four years following the termination of your membership.

Full details of how long we keep records are recorded in our Standing Orders.

Where data is collected based on consent, we will seek renewal of consent at least every six years.

## **Rights you have over your data**

You have a range of rights over your data, which include the following:

- Where data processing is based on consent, you may revoke this consent at any time and we will make it as easy as possible for you to do this (for example by putting 'unsubscribe' links at the bottom of all our emails)
- You have the right to ask for rectification and/or deletion of your information
- You have the right of access to your information
- You have the right to lodge a complaint with the Information Commissioner if you feel your rights have been infringed

A full summary of your legal rights over your data can be found on the Information Commissioner's website here: <https://ico.org.uk/>

## **Enforcing your rights**

If you would like to access the rights listed above, or any other legal rights you have over your data under current legislation, or if you wish to complain about how we are processing your data, please get in touch with us by email at [quest@questlgbti.uk](mailto:quest@questlgbti.uk) or by post at: Data Enquiry, Quest, BM Box 2585, London WC1N 3XX. A designated officer will respond within 28 days. A copy of our complaints procedure can be obtained from our website.

Please note that relying on some of these rights, such as the right to deleting your data, will make it impossible for us to maintain your membership of the

organisation and any associated activities or services. However, where possible we will always try to allow the maximum access to your rights while continuing to deliver as many services to you as possible.

## **Cookies & usage tracking**

A cookie is a small file of letters and numbers that is downloaded on to your computer when you visit a website. Cookies can be used by websites to do a number of things, eg remembering your preferences and counting the number of people looking at a website. Quest uses what are called 'necessary cookies' (necessary cookies are absolutely essential for the website to function properly. This category only includes cookies that ensures basic functionalities and security features of the website and not personal information.)

We also use Google Analytics to generate statistical and other information about our website usage by means of cookies, which are stored on users' computers. The information collected by Google Analytics is not personally identifiable. The data is collected anonymously, stored by Google and used by us to create reports about website usage. Google's privacy policy is available at <http://www.google.com/privacypolicy.html>.

## **Modifications**

We may modify this Privacy Policy from time to time and will publish the most current version on our website. If a modification meaningfully reduces your rights, we'll notify people whose personal data we hold and is affected.

## **Further information**

Further information can be found in Quest's Data Protection Policy.

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## **Appendix 1. Website Privacy Notice Text**

Quest Privacy Notice: Quest takes your privacy seriously and will only use personal information to contact you concerning your membership of the organisation. This may include nomination forms and papers for the Annual General Meeting, sending you the Quest Bulletin and other important notices. We will never pass your details to other organisations, companies or individuals without your consent unless legally obliged to do so.

- For our complete Privacy Policy click here:
- For our cookies policy click here:

Data Retention: Personal information will only be held by Quest for the length of your membership. If your membership lapses, we will retain that information for a maximum period of twelve months following the membership renewal date during which time we will send (a) reminder(s) / invitation(s) to renew. If however you indicate that you do not wish to renew/remain a member of Quest, then your details will be deleted after the AGM.

Right of Complaint: You have the right to complain to the Information Commissioner's Office (ICO) if you consider there is a problem with the way Quest has handled your personal data. However, we would hope you would bring it to our attention in the first instance, using our complaints procedure, so that the issue can be appropriately rectified. Quest's Privacy Policy (including Cookie use) can be found here. Quest's Complaints Policy can be found here.

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## **Appendix 2. Cookies Notification Text**

This website uses necessary cookies to improve your experience while you navigate through the website. We also use Google Analytics to generate statistical and other information about our website usage by means of cookies, which are stored on users' computers. The information collected by Google Analytics is not personally identifiable. The data is collected anonymously, stored by Google and used by us to create reports about website usage. Google's privacy policy is available at <http://www.google.com/privacypolicy.html>. Quest's Privacy Policy (including Cookie use) can be found here. Quest's Complaints Policy can be found here.

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## **Appendix 3. Conference, retreat or other event sign up Privacy Notice**

By completing this form, you are agreeing to Quest retaining and processing your data as necessary for the purpose of allocating you a place at our conference, retreat or other event, taking your payment, and communicating with you prior to the date. If you are not a Quest member, your name and email address will be retained to let you know about future conferences, retreats or other events unless you opt out of such mailings using the option below. All other data will be kept for a maximum period of four months following the Conference, retreat or other event date to assist with the completion of any follow-up tasks, after which point it will be deleted.

So that we can build an impression of how delegate numbers are representative of local Quest group participation, convenors will be periodically notified of which delegates have booked from their area, where a local group has been identified by the person booking. This will however be limited to name only with only the convenor of the relevant group and the conference organiser having access as necessary.

We use Cognito, Zapier and MailChimp systems to support our automated processing. Their privacy policies are available by clicking on the relevant links.

Quest's Privacy Policy (including Cookie use) can be found [here](#). Quest's Complaints Policy can be found [here](#).

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## **Appendix 4. MailChimp Events sign up Privacy Policy**

You are invited to complete this form if you would like to receive information and updates about our annual conferences, retreats and events.

Signing up on this page ensures that you will receive information and updates in the future.

You can unsubscribe at any time by clicking the link in the footer of our emails.

Quest's Privacy Policy (including Cookie use) can be found [here](#). Quest's Complaints Policy can be found [here](#).