



1 January 2024

## **RNA Data Protection Policy**

The Royal Naval Association Confirms that it will comply with the procedures and practices laid out in the Data Protection Act and the GDPR and the Associations Privacy policy.

### **Background**

The RNA data Controller is the Chief Exec/General Secretary and is registered with the Information Commissioner's office as such.

The RNA data Processors are the Central Database Manager and the Finance Manager.

All data is recorded on a central server with backup records held in an encrypted remote server. All terminals accessing the central computer are located within the central Offices. This is a secure location inside a secure MOD Building behind a secure fence.

The GS, DGS and FC have remote access to the central computer for home working.

This policy includes such processing of data as carried out in Central Offices and 'at home'.

The RNA holds data on its members and Branches for three purposes;

1. In order to record their Member's details and financial transactions on a SAGE database.
2. In order to record the names, contact details and status of its Members.
3. In order to record the names and contact details of current Branch, Area and National Council officials.
4. In order to communicate with its Members as may be required to inform Members of Association events, share advice and promulgate news and information from Service Charities of benefit to the Members.

The RNA does not hold any 'Special categories of personal data'.

**Data Processing** - Membership Data is collected annually using a form supplied by Central Office and completed by RNA Branch Secretaries or Branch Membership Secretaries. Returns are collated with the original returns being retained in a central library.

Membership data is held on a central database of all members. This database also contains Branch, Area and National Association Officials. Members data is collected and uploaded to the central database by each Branch's nominated membership secretary only. Individuals have the right to check the accuracy of their data and Branch officials are responsible for updating their Branch officials and Member's details.

Collated data is processed on a Branch basis to compile Association wide Membership figures and trends. No processing of data at an individual basis is undertaken.

Financial data is collected as Individual Members and Branches donate. There may also be Branch levees and disbursements for Association wide transactions and for the ongoing purchases of goods by individuals for personal purchases and for those acting on behalf of a Branch. Individuals have the right to access their own data to check its accuracy. Branches and Members send in updates as and when necessary.

Branch Secretaries - Membership, Record Keeping and Data Protection

Each Branch of the Royal Naval Association is autonomous and as such has access to its own Branch Members details as required through their Branch Secretary. Good record keeping is a primary task of the Branch Secretary and their access to the Database and accurate record keeping is subject to the Data Protection Act. This data must be protected in accordance with this Act and must not be shared, other than for the purpose it was originally collected. Branch Secretaries act as the Data Controller in Branch. Central Office is the Data Controller for the Association, any data sent to Central Office will never be shared other than:

**Data Sharing** – No personal or financial data is shared with other individuals or organisations. Anonymised and Collated data is shared publicly in order to allow financial inspection to take place in compliance with the Charities Act and Charities Commission guidance and to report on the activities of the Association as a charity.

## **PRIVACY POLICY**

### **1. What this privacy notice covers**

The Royal Naval Association is committed to protecting your personal information. In this notice, references to 'we' or 'us' means the RNA. This notice explains how we collect and use the personal information about you.

### **2. Who we are**

The Royal Naval Association is a charity operating under a Royal Charter and registered with the Charity Commission under number 266982.

The Royal Naval Association operates the website [www.royalnavalassoc.com](http://www.royalnavalassoc.com) (the "Website").

The Royal Naval Association is a data controller under the data protection rules and our Data Protection Officer is the Membership Support Manager contactable at RNA Central Office, Building 1/087, Scott Rd, HMNB Portsmouth, PO1 3LU or 02392 723747.

### **3. Information we gather**

The Royal Naval Association gathers certain information about you.

We collect information in the following ways:

- i. Information you give us.  
When you become a member of the RNA you will give us information. You may also give us information when using our Website or purchasing merchandise. Information may include your name, date of birth, postal address, email address, phone number, financial and credit card information.
- ii. Information we get from your use of our Website and services.  
Each time you visit our Website, we may automatically collect certain information. This information includes technical information, such as Internet Protocol (IP) addresses used to connect your computer to the internet, your login information, browser type and

version, browser plug-in types and versions, operating system and platform and information relating to what pages you have viewed (e.g. using cookies as described further below);

#### **4. How we may use your information**

We rely on the legitimate interest basis to use your personal information in some circumstances. For example, when you apply to become a member of The Royal Naval Association, we have a legitimate organisational interest to use your information to respond to you and give you the benefits of being a Member as explained on the Website regarding features of being a Member.

We also rely on obtaining your consent to use your personal information. For example, we will seek your consent to receive marketing via email and post about the RNA.

We may use your information for a number of purposes including the following:

- i. Compliance with legal, regulatory and corporate governance obligations and good practice
- ii. To provide you with information about our work or our activities that you have agreed to receive
- iii. We may send appropriate communications to our members on behalf of individuals and organisations with whom we have a formal relationship.
- iv. Keep a record of your relationship with the RNA

We will use the information we get from your use of our Website and services to:

- i. administer our Website and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes
- ii. improve our Website to ensure that content is presented in the most effective manner for you and for your computer
- iii. allow you to participate in interactive features of our service, when you choose to do so
- iv. as part of our efforts to keep our Website safe and secure
- v. make suggestions and recommendations to you and other users of our Website about goods or services that may interest you or them; and
- vi. any other reasonable purposes of The Royal Naval Association, acting always in accordance with the data protection law (as amended from time to time).

We will use the information you give us to:

- i. perform services you have requested (such as providing you with Membership Benefits or providing you with information you have asked for);
- ii. provide you with information about other goods and services that we offer that are similar to those that you have already purchased or enquired about;
- iii. notify you about changes to our service, including but not limited to any changes to the Member Benefits;

- iv. ensure that content from our Website is presented in the most effective manner for you and for your computer; and
- v. any other reasonable purposes of The Royal Naval Association, acting always in accordance with the data protection law (as amended from time to time).

## 5. Marketing

It is your choice as to whether you want to receive information about our work, how we raise funds and the ways you can get involved. If you do want us to use your personal information in these ways please tick the relevant box situated on the form on which we collect your data.

We will not normally contact you for marketing purposes by email. By subscribing to RNA emails or opting in to email communication from the RNA, you grant us the right to use the email to provide you with Association news.

We may include information from other organisations in these communications.

You can also change any of your contact preferences at any time including telling us that you don't want us to contact you for marketing purposes by telephone, by post, or by contacting Central Office on [admin@royalnavalassoc.com](mailto:admin@royalnavalassoc.com). Should you have a query regarding this please contact our Data Protection Officer.

We will not use your information for marketing purposes if you have indicated that you do not wish to be contacted for such purposes. However, we will retain your details on a suppression list to help ensure that we do not continue to contact you.

## 6. Information Sharing and Disclosure

We may disclose your personal information to third parties if we are under a duty to disclose your personal data in order to comply with any legal obligation (for example to government bodies and law enforcement agencies).

- i. We are under a duty to disclose or share your personal data in order to comply with any legal obligation, or in order to enforce or apply other agreements; or
- ii. to protect the rights, property, or safety of the Royal Naval Association, Our Members, or others. This includes exchanging information with companies and organisations for the purposes of fraud protection and credit risk reduction. No data will be sent outside of EEA<sup>1</sup>.

We require these third parties to comply strictly with our instructions and data protection laws and we will make sure that appropriate controls are in place.

## 7. Keeping your records

We keep records only for as long as required to operate the service in accordance with legal requirements and accounting rules.

## 8. Where we may store your information

The data that we collect from you will be transferred to, and stored at The Royal Naval Association registered office and online systems.

By submitting your personal data, you agree to this transfer, storing or processing.

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<sup>1</sup> This is iaw current legislation.

The Royal Naval Association will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this Privacy Notice.

Where we have given you a password which enables you to access certain parts of our site, you are responsible for keeping this password confidential. We ask you not to share a password with anyone.

## **9. Your rights**

You have the right to:

- i. Have any inaccuracies in your data corrected. If you would like to update the details we hold about you other than online, please contact our Data Protection Officer via telephone, email or by letter.
- ii. Request that we delete your personal data.
- iii. Request that we do not process your personal data for marketing purposes.
- iv. You have a right to request a copy of the personal information we hold about you. We require you to prove your identity with two pieces of approved identification. Please address requests to the Data Protection Officer and we will respond within one month, of receipt of your written request and confirmed ID. Please provide as much information as possible about the nature of your contact with us to help us locate your records. This request is free of charge unless the request is manifestly unfounded or excessive.

## **10. Changes to this notice and the way we treat personal information**

We may update the terms of this privacy notice at any time, so please do check it from time to time.

We will notify you about significant changes in the way we treat personal information by sending a notice to the primary email address you have provided to us or by placing a prominent notice on our Website. By continuing to use our Website you will be deemed to have accepted such changes.

## **11. Enquires and Complaints**

The Data Protection Officer is the first point of contact regarding any enquires arising from this Privacy Notice. Where possible, please raise all enquires in writing.

If you are unhappy with our work or something that we have done or failed to do, please inform us in writing. The Royal Naval Association will acknowledge receipt of all complaints and will endeavour to investigate the complaint within 15 working days

All complaints should be sent to:

The RNA Central Office  
Bldg 1/087, Scott Rd  
H M Naval Base  
Portsmouth  
PO1 3LT

You may also complain directly to the Information Commissioner's Office if you are concerned with how we are handling your personal information using their online form which can be found here: <https://ico.org.uk/concerns/handling/>.

## **12. Changes to this Notice**

We may change this Privacy Notice from time to time. If we make any significant changes in the way we treat your personal information we will contact you directly.

***Information Commissioner's Office – Registered Organisation***

***This Notice was last updated January 2024***