

INTERNATIONAL LONGEVITY CENTRE – UK

DATA PROTECTION NOTICE

Who are we?

The International Longevity Centre – UK (the **ILC-UK, we or us**) is a registered charity (no. 1080496) incorporated with limited liability in England and Wales (company no. 3798902). We collect, hold and use personal information to help us run and promote the ILC-UK.

What is the purpose of this notice?

We are data controllers in respect of the personal information that we hold. Because we use your personal information, we have to provide you with certain information in order to comply with new data protection legislation set out in the General Data Protection Regulation (**GDPR**).

This notice contains information on:

- The personal information we collect about you, what we do with this information and why we hold it. This is explained in more detail in section one (see page 2).
- Who else we get personal information from and who else we share personal information with. This is explained in more detail in section two (see page 5).
- What rights you have in relation to your personal information and who to contact if you have any problems. This is set out in section three (see page 6).

We have set out additional information your rights under the GDPR (see page 7), third parties with whom we share your personal information (see page 10) and an explanation of the key terms and phrases that are used in this notice (see page 11).

Where can I get more information?

This notice is at www.ilcuk.org.uk/images/uploads/ILC-UK_Data_Protection_Notice_2.pdf. We can also provide printed versions (including large print versions) on request.



This notice explains how the ILC-UK processes your personal information. Please read this notice (and any other privacy information that we send to you) so that you are aware of how and why we are using your personal information.



We may change this notice from time to time. Please visit the webpage or contact us in order to receive the most up to date version of this notice. Our contact details are set out in section three of this notice (see page 7).

SECTION ONE

ABOUT YOUR PERSONAL INFORMATION

What information do we collect and process?

We collect and process your personal information because you are or were an employee, a donor or a mailing list member of the ILC-UK.

We may collect and process the following categories of personal information about you (although the precise data we collect will vary depending on your connection to the ILC-UK):

- **personal contact details** – names, titles, addresses, telephone numbers and email addresses;
- **information about you** – dates of birth and gender; and
- **employee information** – National Insurance numbers, payroll numbers, bank account details, tax status, salary and employment information.

What sensitive personal information do we collect and process?

Certain categories of sensitive personal information (e.g. race, ethnicity, religious beliefs and sexual orientation) may be revealed on formal documentation that we process in order to carry out standard due diligence checks on current or potential employees (e.g. birth certificates, marriage certificates, driving licenses and passports). You may also decide to provide us with sensitive personal information voluntarily (e.g. when raising queries or making a complaint).

How do we collect your personal information?

When you join the ILC-UK as an employee, you provide personal details that we retain as your employer.

When you attended one of our events or visit our website, you were given the option to be added to our mailing list so as to keep up to date with news relating to the ILC-UK.

This information may be updated. Updated information may come from:

- you (e.g. if you get in touch to let us know a new address);
- other third parties (e.g. if HMRC provides us with information so that we can deduct the correct level of tax from your salary).

In addition, we may request additional information in certain circumstances (e.g. we may ask you to update your details on our system when signing up for one of our events).

Why do we process your personal information?

We use this information to:

- set up your employee record for the ILC-UK;
- manage your employment with the ILC-UK;
- send you information that is relevant to you as a member of the ILC-UK mailing list;

- comply with our legal and regulatory duties; and
- distribute information about the ILC-UK.

What are our legal grounds for processing your personal information?

Your consent

In many cases, we believe we have your explicit consent to process your data for the purposes mentioned in this document. To the extent that this may not be true in some cases, we are relying on the other grounds mentioned here.

In order to comply with our legal obligations

We are under legal obligations to process your personal information in order to comply with charities and other relevant legislation and court rulings. For example, legislation sets out certain actions the ILC-UK must take as an employer (e.g. retaining certain information about the ILC-UK's employees for tax purposes).

It may be necessary for us to process your personal information in order to comply with these legal obligations.

In order to fulfil our legitimate interests

Processing your personal information is also lawful if it is based on our 'legitimate interests'. We have a legitimate interest in promoting the charitable purposes of the ILC -UK and in running, promoting and marketing the ILC-UK and managing the ILC-UK's risks and liabilities. In addition, certain third parties may have legitimate interests which require the processing of your personal information by the ILC-UK (e.g. if you are an employee of the ILC-UK, HMRC may need information in order to comply with regulatory requirements).

In order to rely on this legal ground, we have:

- considered the impact the processing has on your interests and rights; and
- implemented appropriate safeguards to ensure that your privacy is protected as far as possible.

If relevant, what would be our legal grounds for processing your sensitive personal information?

There are three legal grounds that allow us to process your sensitive personal information (sometimes referred to as special categories of personal data):

- when we obtain **explicit consent** from you (e.g. when you sign one of the ILC-UK's forms which contains the appropriate consent wording);
- when processing is **necessary** for carrying out obligations under employment, social security or social protection law. This includes obligations under charities law; and
- when processing is **necessary** for reasons of substantial public interest.

What would happen if we did not collect and process your personal information?

If we did not collect and process your personal information then:

- we would not be able to deliver the charitable purposes of the ILC-UK;

- we would not be able to manage or administer the ILC-UK appropriately;
- we would not be able to promote and fundraise for the ILC-UK effectively;
- we would not be able to provide the benefits that you may be entitled to as an employee the ILC-UK; and
- we would be in breach of our legal and regulatory duties.

How long do we keep your personal information for?

Employees

We need to maintain records in order to properly perform the contract between us and comply with the legal obligations that we are under as an employer. Additionally, in the case that a dispute should arise between us, we would need access to your employment records for defence against potential legal claims.

As a result, we will generally keep your personal information for up to seven years following termination of your employment. Our service providers (and former service providers) may also have similar valid grounds to keep your personal information for such long periods.

Other

We need to maintain records in order to properly run and promote the ILC-UK, and to circulate details of our publications and events to those on our mailing list.

As a result, we will generally keep your personal information for seven years. Our service providers (and former service providers) may also have similar valid grounds to keep your personal information for such long periods.

SECTION TWO

USING AND SHARING YOUR PERSONAL INFORMATION

How do we keep your personal information secure?

We use a range of measures to safeguard your personal information, in line with the requirements set out in the Data Protection Legislation. These apply to both paper and electronic records. We also require our third party service providers to give certain assurances and agree to contractual terms in respect of data protection and the security of your personal information.

What do we do with any personal information that is provided by third parties?

We receive personal information from sources other than directly from you. This includes information shared by marketing service providers and other relevant third parties (e.g. HMRC).

When we receive this information, we add it to the information we already hold about you in order to help us make sure that your details are as up to date and accurate as possible and so that we can manage your membership of the ILC-UK and the ILC-UK more generally.

Who do we share your personal information with?

For the purposes of managing the ILC-UK, managing its risks and liabilities, and paying employee benefits, we may need to share your personal information with third parties. This will include, but is not limited to, your name, address and contact details. These third parties may include actuaries, administrators, auditors, insurers and/or any other such third parties as may be necessary for the operation of the ILC-UK and to enable us to operate the ILC-UK.

We've set out a list of the key third parties with whom we share your personal information together with links to their data protection and privacy information (see page 10).

Our suppliers and service providers who act as data processors must act in accordance with our instructions. Some of our suppliers and service providers also act as data controllers in respect of your personal information. We've included links to their online privacy information if you want to find out more about how they process your personal information.

In some circumstances, we may have to disclose your personal information by law, because a court or the police or other law enforcement agency has asked us for it. We may also need to pass your personal information to The Pensions Regulator or HM Revenue and Customs.

SECTION THREE

YOUR RIGHTS AND WHO TO CONTACT

What rights do you have in respect of your personal information?

In certain circumstances, you have the following rights in respect of your personal information:

- the right to **object** to us processing your personal information;
- the right to request **access** to personal information relating to you;
- the right to request that we **correct any mistakes** in your personal information;
- rights in relation to **automated decision taking**;
- the right to request to **restrict or prevent processing** of your personal information;
- the right to request to have your personal information **transferred** to another data controller (e.g. if you decide to transfer your pension benefits to another pension scheme); and
- the right to request to have your personal information **deleted**.

We've set out more information about these rights in part two of the additional information starting on page 9.

How will we respond to your request?

We will usually respond to any request that you make in relation to your rights within a month of receiving your request. If your request is particularly complex, we will let you know that we've received your request and let you know when we aim to respond. You can find out more about your rights under the UK's data protection laws at www.ico.org.uk.

Under the UK's data protection legislation, there are exemptions which mean that, in certain circumstances, we may continue to store, process or transfer your personal information (for example where we need to comply with a legal requirement or have a legally valid legitimate interest in doing so) even if you ask us not to.

What should you do if you have any questions or complaints?

You may be entitled to compensation for damage caused by breach of the Data Protection Legislation. If you do not think that we have processed your data in accordance with this notice, please contact us in the first instance (see 'How to contact us' below). If you are not satisfied, you can complain to the Information Commissioner's Office. Information about how to do this is available on their website at www.ico.org.uk/concerns or by calling their helpline on 0303 123 1113.

How to contact us

Please contact us if you have any questions about this privacy notice or the information we hold about you.

If you wish to contact us, please send an email to info@ilcuk.org.uk or write to us at: 11 Tufton Street, London SW1P 3QB. Alternatively, you can call the ILC-UK's helpline on 020 7340 0440.

FURTHER INFORMATION – PART ONE

MORE ABOUT YOUR RIGHTS UNDER THE GDPR

As a data subject, you have a range of rights under the Data Protection Legislation. These rights are explained in more detail below. If you have any comments, concerns or complaints about our use of your personal information, please contact us directly.

You can email us at info@ilcuk.org.uk or write to us at:

11 Tufton Street
London SW1P 3QB

Alternatively, you can call the ILC-UK on 020 7340 0440.

Right to object to our processing of your personal information

You may object to us processing your personal information where we are relying on a legitimate interest as our legal grounds for processing. Our legal grounds for processing are set out in section one of this data protection notice (see page 2).

If you have the right to object to processing (i.e. for personal information that we process in order to fulfil our legitimate interests or the legitimate interests of a third party) **and** you exercise this right, we will no longer be able to process your personal information **unless** we can demonstrate compelling grounds for continuing to do so. We believe we have demonstrated compelling grounds as set out in section one of this data protection notice (see page 2).

Right to access personal data relating to you

You can ask us to confirm whether we are processing your personal information. If we are, you may ask us to provide the following:

- a copy of your personal information (please note that, if you want more than one copy of your personal information, we reserve the right to charge a reasonable fee based on our administrative costs for the provision of such further copies);
- details of the purpose for which your personal information is being, or is to be, processed;
- details of the recipients or classes of recipients to whom your personal information is, or might be, disclosed, including, if the recipient is based in a country outside of the European Union, what protections are in place in relation to the transfer to that recipient;
- the period for which your personal information is held (or the criteria we use to determine how long it is held);
- any information available about where we obtained your personal information; and
- confirmation as to whether we carry out any automated decision-making (including profiling) and, where we do, information about the logic involved and the envisaged outcome or consequences of that decision or profiling.

Requests for your personal information must be made to us in writing (see 'How can you contact us?' below). A copy of your request will be kept on your membership record. To help us find the information easily, please give us as much information as possible about the type of information you would like to see.

If, to comply with your request, we would have to disclose information relating to or identifying another person, we may need to obtain the consent of that person if possible. If we cannot obtain consent, we may need to withhold that information or edit the data to remove the identity of that person if possible.

There are certain types of information which we are not obliged to disclose to you, which include personal information which records our intentions in relation to any negotiations with you where disclosure would be likely to prejudice those negotiations.

Right to correct any mistakes in your information

You can require us to correct any mistakes (including adding missing information) in any of the personal information concerning you which we hold. Please contact us using the contact details set out at the beginning of this section.

Rights in relation to automated decision taking/making

We do not generally use automated decision making or profiling.

Automated decision making occurs when decisions are taken solely on automated processes. Under the Data Protection Legislation, you have the right to ask that, if you are being evaluated (for example, when a bank carried out credit checks before making decisions on issuing loans or credit cards), any decisions are not solely based on automated processes and to have any decision reviewed by a member of staff.

These rights will not apply in all circumstances, for example where the decision is authorised or required by law and steps have been taken to safeguard your interests.

Right to request that we restrict the processing of your personal information

You may request that we restrict the processing of your personal information in any of the following circumstances:

- where you do not think that your personal information is accurate. In this case, we will start processing again once we have checked whether or not your personal information is accurate;
- where the processing is unlawful, but you do not want us to erase your information;
- where we no longer need the personal information for the purposes of our processing, but you need the information to establish, exercise or defend legal claims; or
- where you have objected to processing because you believe that your interests should override our legitimate interests. In this case, we will start processing again once we have checked whether or not our legitimate interests override your interests.

If our processing is restricted in any of the circumstances described above, we will inform you in advance if that restriction is to be lifted.

Right to request that we delete your personal information

You can ask us to delete your personal information where your personal information is being processed on a legal ground other than for complying with a legal obligation and:

- you believe that we no longer need to process it for the purposes set out in this privacy notice;
- you had given us consent to process it, but you withdraw that consent and there is no other legal ground upon which we can process it;
- you have successfully objected to our processing it; or
- it has been processed unlawfully or has not been erased when it should have been.

Right to request transfer of your personal information

You may, in specified circumstances, ask a data controller to provide you with an electronic copy of personal information that you have provided to it, or to have such a copy transmitted directly to another data controller.

Those circumstances do not, however, generally apply in relation our processing of your personal information in connection with the ILC-UK. This is because:

- our legal grounds for processing will not normally be that you have consented to the processing; and
- we do not carry out processing by automated means.

Right to withdraw consent

You have the right to withdraw any consent you have given us at any point (e.g. consent to contact you with marketing and promotional materials).

What will happen if your rights are breached?

You may be entitled to compensation for damage caused by breach of the Data Protection Legislation. If you do not think that we have processed your information in accordance with this notice, please contact us in the first instance.

If you are not satisfied, you can complain to the Information Commissioner's Office. Information about how to do this is available on their website at www.ico.org.uk/concerns or by calling their helpline on 0303 123 1113.

FURTHER INFORMATION – PART TWO

THIRD PARTIES AND TRANSFERS

For the purposes of managing and administering the ILC-UK, we may need to share your personal information with certain third parties. This section lists the key third party service providers with whom we share your personal information.

ROLE	THIRD PARTY	OTHER INFORMATION AND THIRD PARTY PRIVACY NOTICES (IF APPLICABLE)
Donation Site Host	BT	https://myoffice.bt.com/adhoc.aspx?id=338163&s_cid=btb_FURL_business/privacy
Event Ticketing	Eventbrite	https://www.eventbrite.co.uk/support/articles/en_US/Troubleshooting/eventbrite-privacy-policy?lg=en_GB
Mailing List Administrator	MailChimp	https://mailchimp.com/legal/privacy/
Marketing Database and Journalist Services	Gorkana	http://www.gorkana.com/about-gorkana/privacy-policy/

Transfers of your personal information out of the EU

Your information may be transferred out of the European Union. Our service providers have confirmed that they either:

- do not transfer the ILC-UK's data outside of the European Union; or
- do or may transfer the ILC-UK's data outside of the European Union, but only when certain protections that are approved by the European Commission are applied. These protections aim to ensure the security of your personal information, safeguard your privacy rights and give you remedies in the unlikely event of a security breach or to any other similar approved mechanisms.

FURTHER INFORMATION – PART THREE

KEY TERMS AND PHRASES

Data controller	means the natural or legal person or other body who, alone or jointly with others, determines the purposes and means of the processing of personal data. This means that the data controller exercises overall control over the 'why' and 'how' of a data processing activity.
Data Protection Act 1998	is the legislation that currently applies to the processing of personal data in the UK. The Data Protection Bill 2017 – 19 will repeal the Data Protection Act 1998.
Data Protection Legislation	means the Data Protection Act 1998, the Data Protection Bill 2017 – 19 and the General Data Protection Regulation, together with regulatory guidance issued by the European Commission (via the Article 29 Working Party) and the Information Commissioner's Office.
Data protection principles	<p>means the principles that are set out in the Data Protection Legislation relating to the processing of personal data. In the General Data Protection Regulation, there are six principles:</p> <ul style="list-style-type: none">• lawfulness, fairness and transparency;• purpose limitation;• data minimisation;• accuracy;• storage limitation; and• integrity and confidentiality. <p>In addition, there is an overarching principle of accountability.</p>
Data processor	means a natural or legal person or other body who processes personal data on behalf of the data controller.
Data subject	means the identified or identifiable living individual to whom personal data relates.
General Data Protection Regulation (GDPR)	is the primary EU legislation that, on and from 25 May 2018, will apply to the processing of personal data in all member states of the EU.
Information Commissioner's Office (ICO)	is the UK's national data protection authority. It is a public body that is charged with regulating information rights, public sector transparency and individual's privacy in the UK.
Personal data or Personal information	means any information relating to an identified or identifiable natural person; an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number etc.
Privacy notice	means the information that is provided to inform individuals about what you do with personal data. Under the Data Protection Legislation, data controllers must provide

accessible information to individuals about the use of their personal data.

Processing

means any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

Special categories of personal data

(also referred to as sensitive personal data)

means:

- personal data that is personal data which reveals racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership;
- the processing of genetic data, biometric data for the purpose of uniquely identifying a natural person;
- data concerning health; or
- data concerning a natural person's sex life or sexual orientation.