



# Alpine Club Privacy Policy

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## How your personal information is used by the Alpine Club

Last updated May 2018

Data Protection law changed on 25 May 2018 with the introduction of the General Data Protection Regulation and therefore, like all clubs with members, the Alpine Club has reviewed the use of members' data in the running of the club.

## How we use your personal information

This is to let you, as a member, know how the Club uses your personal data, including what you tell us about yourself. This notice explains how we do this and tells you about your privacy rights and how the law protects you.

Our Privacy Policy

We will:

- keep your data safe and private.
- not share your data with third parties other than those identified in this document.
- allow you to see your personal data on-line or request a copy of it.

GDPR-Alpine Club Privacy Policy – Approval on 12<sup>th</sup>  
June 2018



### **What is in scope and what is out of scope?**

As the Alpine Club Main Committee is responsible for the management of the Alpine Club, their responsibility as regards GDPR is just for the Alpine Club and therefore the content of this document is purely related to the Alpine Club.

As the Alpine Club Main Committee is not responsible for the management of the other legal entities detailed below, it is their individual management teams who are responsible for their compliance with GDPR and any matter should be taken up with their management team:

- Alpine Club Library
- George Starkey Hut Ltd
- Mount Everest Foundation
- Spirit of Mountaineering

If you have any questions, or want more details, about how the Alpine Club uses your personal information, contact the Honorary Secretary [honsec@alpine-club.org.uk](mailto:honsec@alpine-club.org.uk) or, in the first instance, by calling the Club on 020 7613 0755



## **Confidentiality**

As a member of the Alpine Club, whether you are an Officer of the Club, a Volunteer and of course as a Member, please ensure the confidentiality of the club members' personal data and information at all times as defined by the General Data Protection Regulation. In particular, ensure that the data and information that is available to you is not made available to any person who is not a member, either intentionally or inadvertently.



## How the law protects you

The law requires the Club to only use your personal information for the purposes for which it was collected and not to keep your data for longer than is necessary for that purpose, i.e. the Club can only use your personal information if we have a proper reason to do so. This includes sharing it with organizations identified in this document

The law allows the Club to hold and use your personal information:

- If you gave your consent for the Club to hold the information.
- If the Club has identified a legitimate interest to do so.

A legitimate interest is when we have identified, or where we believe, there is a clear benefit to you as a member and that as a member you would reasonably expect the Club to use the data in that way. Any legitimate interest must not unfairly go against what is right and best for the Club's members. Where the Club relies on legitimate interest, this is stated and also what that legitimate interest is.



## How the Alpine Club and its members may use your personal information

Note - where the Club has identified “Legitimate Interest” as the basis this is stated:

Who in the Club may use your personal information?	What data the Club or member of the Club may use	Legitimate Interest
<p>Membership Secretary, other members of the Club’s management team, volunteers, as well as the Club’s office staff.</p>	<p>The details provided to the Club by the member on their application form are entered into the Club’s Membership Database upon the applicant being admitted to the Club; this includes the year of their election.</p> <p>The Club’s Membership database may contain changes to this original data made by the member themselves by logging onto the Membership Database to keep their data up to date or by the Club’s management team, volunteers or office staff after making changes advised to them by a member.</p> <p>Details regarding any offices held and the date of first holding that office are recorded.</p> <p>If the member was a member of the Ladies Alpine Club or the Alpine Climbing Group this is noted as is the year they were admitted and any office they held.</p> <p>Subscription information including amounts due and paid</p>	<p>This is the central repository of every member’s data that the Club uses to manage and develop its relationship with the members, ensuring that at all times this data is as up to date as possible and available for use in running the Club.</p>



Who in the Club may use your personal information?	What data the Club or member of the Club may use	Legitimate Interest
	are recorded. Previous year subscription information is also held. (This is under review)	
Membership Sub-Committee	The data entered onto the Membership Application forms both for those applicants that will be admitted following the process as well as those that are unsuccessful.	
Club Archive	<p>Main Committee papers and any papers relating to Sub-Committees and Working Groups lodged with the archive.</p> <p>Repository for a range of items of data related to current, former members and other people associated with mountaineering.</p>	The Club retains information to maintain the Club heritage.
Meet Organiser	Information that the Meet Organiser requests from an individual who wishes to attend an Alpine Club meet potentially before and during the meet.	
Members	Names, addresses and contact details of other members. The information is made available on-line once the member has identified themselves by logging into the Members' Area.	<p>This is the central repository of every member's data that the Club uses to manage and develop its relationship with the members, ensuring that at all times this data is as up to date as possible.</p> <p>For those members with a log in, it is available for obtaining other members' contact details so that members can network with one another.</p>



Who in the Club may use your personal information?	What data the Club or member of the Club may use	Legitimate Interest
		Any member who wishes to have their details withheld from the rest of the Club can at any time contact the Honorary Secretary to request to have their details removed with the exception of name, membership number, date of birth and membership status.
Montane Alpine Club Climbing Fund Sub-Committee	The data entered onto the MACCF application form so that the Sub-Committee members may consider individuals for funding from MACCF	
Club Newsletter Editors	The Newsletter editor may share members' details in a newsletter.	
Club Facebook Page and Facebook Messenger	The Alpine Club does not collect any individual information or data of members or followers of the Facebook platform.	
Club Twitter	The Alpine Club does not collect any individual information or data of members or followers of the Twitter platform.	
Paypal	<p>Those members that pay for any Club goods and services will share their identity, debit or credit card details with PayPal through the Club's PayPal link.</p> <p>These debit and or credit card details are not shared by PayPal with the Club.</p> <p>If you wish to know further details please refer to the</p>	



Who in the Club may use your personal information?	What data the Club or member of the Club may use	Legitimate Interest
	PayPal User Agreement.	

### Which 3<sup>rd</sup> parties the Alpine Club may shares member’s personal information with and why

Note - where the Club has identified “Legitimate Interest” as the basis this is stated:

Which 3 <sup>rd</sup> parties the Club may share your personal information with	What data the Club will share	Legitimate Interest
Montane	Contact details of members receiving a Montane Alpine Club Climbing Fund (MACCF) grant may be shared with Montane to facilitate arrangements for the expedition as well as discuss potentially further support.	
BMC	Name, contact details and date of birth	Annually to affiliate members to the British Mountaineering Council.  Upon being affiliated the BMC will use the data to communicate with you about your membership and request from you which communications you will wish to receive.



Which 3 <sup>rd</sup> parties the Club may share your personal information with	What data the Club will share	Legitimate Interest
		More information about how the BMC uses data can be found at <a href="http://www.thebmc.co.uk/privacy">www.thebmc.co.uk/privacy</a> .
St Andrews Press	Membership Card Supplier <ul style="list-style-type: none"> <li>• Membership Card Distribution List</li> <li>• Membership Details: Name, Address, Membership No, Status</li> </ul>	So that members will receive an annual Membership Card that will enable them to confirm their membership of the Alpine Club and therefore gain access to the RGS, the Alpine Club Library, receive discounts at retail outlets as well as concession rates in certain Alpine huts.
Charlesworth Press	Newsletter Mailing <ul style="list-style-type: none"> <li>• Distribution List</li> </ul>	So that members will receive the three copies of the Club's Newsletter each year.
Cordee Ltd.	Alpine Journal Mailing <ul style="list-style-type: none"> <li>• Distribution List</li> </ul>	So that members will receive the annual Alpine Journal produced by the Club.
Heart Internet	Membership data is held on databases stored on servers provided by Heart Internet; they are Data Processors for the Club.	
Facebook	<p>The Alpine Club does not share any of its members data with the Facebook platform. Neither does the Alpine Club add members to its Facebook pages and groups or messenger tool.</p> <p>In situations where the Alpine Club uses individual member's names, photos or videos it will seek consent before publication.</p> <p>Posts and other content on Facebook pages may contain names, pictures or videos of individual Alpine Club members,</p>	In cases of redistributing publicly available information (e.g. from posts of individuals, news articles from other public sources) the Alpine Club may decide to repost these without prior consent in order to inform its Facebook audience on mountaineering activities, achievements and aspects of general mountaineering interest that are in line with the Alpine Club's ambitions and ethos.



Which 3 <sup>rd</sup> parties the Club may share your personal information with	What data the Club will share	Legitimate Interest
	<p>e.g. in reports on Club Activities and Expeditions, publicly available news-items and similar.</p> <p>Members themselves can decide themselves to join and leave the relevant Alpine Club Facebook pages and groups. The Alpine Club can provide the relevant page names and group names to interested parties.</p>	
Twitter	<p>The Alpine Club does not share any of its members data with the Twitter platform. Neither does the Alpine Club add members to its Twitter profile.</p> <p>In situations where the Alpine Club uses individual member's names, photos or videos it will seek consent before publication.</p> <p>Posts and other content on Twitter pages may contain names, pictures or videos of individual Alpine Club members, e.g. in reports on Club Activities and Expeditions, publicly available news-items and similar.</p> <p>Members can decide themselves to follow or unfollow the Alpine Club Twitter account. The Alpine Club can provide the relevant Twitter account name to interested members.</p>	<p>In cases of redistributing publicly available information (e.g. from Tweets of individuals, news articles from other public sources) the Alpine Club may decide to retweet these without prior consent in order to inform its Twitter audience on mountaineering activities, achievements and aspects of general mountaineering interest that are in line with the Alpine Club's ambitions and ethos.</p>



Which 3 <sup>rd</sup> parties the Club may share your personal information with	What data the Club will share	Legitimate Interest
Clear Direct	Member's UK Bank details.	To enable those members who have provided their UK bank account details to the Club, as the source of the funds to pay their annual membership fee in an efficient manner, the Club provides these details to "Clear Direct" the Bureau that the Club uses to collect payment of membership fees via Direct Debit.
Alpine Club Library	Valid Membership of the Alpine Club.	To enable the ACL to validate an AC member's membership in order to enable that member to use the facilities of the Library remotely or request material in advance of physically visiting the library.
George Starkey Hut Ltd	Valid Membership of the Alpine Club.	To enable the GSH Ltd to validate an AC member's membership in order to: <ul style="list-style-type: none"> <li>• Make a booking as an individual member of the AC</li> <li>• Apply to become a member of GSH Ltd</li> <li>• Confirm on-going membership of the AC in order to continue to be a valid member of GSH Ltd.</li> </ul>
Oread Mountaineering Club	Valid Membership of the Alpine Club.	To enable the Oread Mountaineering Club to validate an AC member's membership in order for that member to make a booking as an individual member of the AC
Club Auditors	All financial transactions with the club will be available to the Club's auditors. These may contain personal information – names and addresses and are provided in order to complete	



Which 3 <sup>rd</sup> parties the Club may share your personal information with	What data the Club will share	Legitimate Interest
	the statutory requirement.	
Bank	Those members who provide their bank account details in order to have their expenses settled will have these details shared with the Club's bank.	
Accommodation Providers	As part of organising a meet it might be necessary to provide accommodation providers with basic personal information such as name, date of birth and contact details.	To enable the Meet Organiser to organise the meet on behalf of the members.
Mountain Guides	Some meets use mountain guides to strengthen individual skills. In order to identify the level of mountain experience, the Meet Organiser may choose to share the climber's name and recent climbing experience with the guide.	In order to co-ordinate the services of the guide.
Emergency Services	As part of organising a meet the Meet Organiser may collect data on members and guests in case of an emergency. This information may include mobile phone numbers, contact numbers and details of next of kin, car registration numbers and medical information. In the case of an emergency, this information may be shared with the emergency services.	

## Information to be communicated

### Club

The Club's policy is to make every effort to only send to members communications that are relevant to them. For example communications regarding the Alpine Club, Alpine Club Library, George Starkey Hut Ltd, Mount Everest



Foundation, Climb Action Nepal, Spirit of Mountaineering, Mountain Heritage Trust, Piolet d'Or, BMC or items of alpine mountaineering and climbing that we feel are of interest to members.

The Club will not send political or commercial messages.

### **Members**

Members are encouraged to communicate information on aspects of mountaineering and climbing that they believe may be of interest to other members.

Members must not send political or commercial messages, including topics in which they have a commercial interest (for instance do not include trips / expeditions you are guiding as a commercial guide, left over expedition fundraising merchandise you want to sell, messages promoting books you have written, apps you have developed or films that you have produced).

Members are welcome to send suggestions to the main committee or the social media & communications sub-committee, of other potential communications that do not meet the criteria provided above.

If you have any doubt, please contact the Office Manager or the Honorary Secretary.

### **Communication Medium**

#### **Office Circular**

The Club may send emails to all members who have declared an email address. The topics of these emails cover announcements likely to be of interest to all members such as: up-coming lectures, death announcements, details



regarding the AGM, any SGMs as well as Club dinners etc. Currently it is not possible to opt out of receiving these emails; however, this is under review.

### **Alpinet**

Members having provided their e-mail address, may opt into Alpinet: the member-to-member email service.

Members can opt out of Alpinet at any time.

### **Social Media – Facebook and Twitter**

Facebook: - The Alpine Club has established on Facebook a page, and a group limited to members. Meet leaders have created closed groups for their individual meets. All of these are used to inform members about the Alpine Club's activities, share photographs and videos and to distribute mountaineering related news and articles of interest. The pages as well as the groups are aimed to be interactive, inviting users to share their relevant news, photos or information, while the Alpine Club remains in full control of the contents. No personal data from the page or groups are stored or processed by the Alpine Club outside the Facebook platform. Facebook users opt in voluntarily to follow or join a group. Followers/members of the page and/or groups can opt out at any time by clicking on the relevant button or the interface.

Twitter: - The Alpine Club has established a Twitter account in order to tweet and retweet information about the Alpine Club's activities, share photos and videos and to distribute mountaineering related news articles or information of interest. No personal data from Twitter is stored or processed by the Alpine Club outside the Twitter platform.



## Groups of Personal Information

The Club from time to time uses member's personal data or aggregates members' personal data in a number of ways. Here is a list of all the ways that the Alpine Club uses members' data or aggregates personal information

<b>Personal Information</b>	<b>Description</b>
Location	Where you live is used to ensure hard copy correspondence and Club publications are sent to you, the completion of the BMC affiliation return and to profile the membership.
Climbing and Mountaineering Experience	Information with Membership application or Meet application.
Letter of Support	Information with Membership application.
Membership Type	Aspirant, Associate, Full or Honorary and Alpine Climbing Group membership.
Financial	Your bank account from which you wish to pay your Annual Subscription as well as your membership payment history.
Contact	How to contact you; both e-mail, phone and by post.
Documentary Data	Details about you that are stored in documents and papers in various formats, or copies of them.
Age/Year of Birth	Your year or birth is used to profile the membership and also for the calculation of your membership subscription rate.
Gender	Your gender is used to profile the membership.
Vehicle details	Your car registration number may be collected by the Meet Organiser to be used in case of an accident.



Misc Types of Data	Any offices you have held within the Club, MACCF applications, MACCF reports, Locum Parentis, next of kin.
Consent	Any permissions, consents or preferences that you give to the Club. These include how you wish the Club to contact you and whether you are sent Club communications and publications.

The Facebook page offers “insights” on aggregated (non-individual level) for the Facebook page of the Alpine Club; information is only available on an aggregate level with no information on individual behaviour. From time to time the Alpine Club uses the aggregate data/information to analyse the suitability of the Facebook platforms for providing information on the Club activities. The data and information are not shared with third parties.

## Sending data outside of the EEA

We will only send your data outside of the European Economic Area (‘EEA’) to:

- Members who live outside the EEA
- Clubs or other alpine associations that we are holding joint events with, such as meets
- Following your instructions to do so.

If we do transfer information to our agents, clubs or alpine associations outside of the EEA, we will make sure that it is protected in the same way as if it was being used in the EEA and if necessarily encrypted.



## If you choose not to give personal information or wish to have personal information withheld

If you choose not to give some or all of your personal information this will not prevent you from being a member. However, it may delay or prevent us from communicating with you and providing to you some or all of the benefits of being a member of the Alpine Club.

Any member who wishes at any time to have details withheld from the rest of the Club's membership can do so by contacting the Honorary Secretary and asking for their personal details to be removed. The only information that will be retained is the information required to collect the member's subscription, including their name and membership number.

## How long we keep your personal information

Information on members and former member of the Club is retained where the information is likely to be of interest for later research - name, years in the club, positions held, original application forms etc. This information will be kept indefinitely as it is vital in the context of the Club's heritage.

From time to time former members or unsuccessful applicants for membership may re-apply to the Club for membership and the retention of data from the former member or the individual who previously applied is helpful in the application



process. In the case of unsuccessful applicants for membership their basic personal details will be retained electronically on the membership database, however, their application form will be destroyed within a year.

## How to get a copy of your personal information

You can get a copy of the personal information the Club holds by contacting the Honorary Secretary at:

Alpine Club

55 Charlotte Road

London

EC2A 3QF

UK

## Letting us know if your personal information is incorrect

You have the right to question any information we have about you that you think is wrong or incomplete. Please contact us if you want to do this.



If you do, we will take reasonable steps to check its accuracy and correct it.

## Disclosure of personal data - Employees

The Club will disclose employees' personal data to third parties for the following purposes:

- To comply with legal requirements
- In respect of the Company's auto-enrolment pension scheme
- In respect of fulfilling the requirements of the payroll bureau service

## Cookies

To find out more about how we use cookies please read our cookies policy.

Alpine Club, 55 Charlotte Road, London, EC2A 3QF, UK