

Privacy Statement

Last Updated: 04/06/2018

Who Are We?

When we use the terms "We" "us", "our" or "SCL", we refer to the Society for Computers and Law. More details about us can be found at scl.org/about.

What is this document?

We process certain information about you which relates to you ("*Personal Data*"). This Privacy Policy sets out what Personal Data we process, for what purpose and explains how we process that Personal Data.

It also gives our reasons for processing, which identify our legal basis for doing so under the General Data Protection Regulation and the Data Protection Act 2018.

What Personal Data do we process, and why?

We process the following Personal Data:

User and/or membership profile:

If you register for an account with our site www.scl.org (our "Site") we will process and store Personal Data you submit to create and update that account (your "Account"). Where you are or become a member of SCL and provide Personal Data to us to maintain your membership record, this Personal Data will be added to your Account on this Site, as this account forms our authoritative record of your membership of SCL. As well as Personal Data that you provide to us, we may also add Personal Data to your Account that we observe about you, for example notes of telephone calls that we have with you.

Personal Data collected as part of your Account will include:

- **Name and contact details:** Your name, address, phone number and/or e-mail address.

Purpose	Reason
To service your Account or membership	To perform our contract with you

- **Professional details:** Your employer, job title and other details (such as qualifications), or if you are a student or academic, details about your position, course / specialities and institution.

Purpose	Reason
To service your Account or	To perform our contract with you

membership	
To understand the profile of our membership	In our legitimate interests to meet our charitable objectives

- **Membership details:** Whether you are a member of SCL, the type of membership that you hold, and the date of creation and expiry of such membership.

Purpose	Reason
To service your Account or membership	To perform our contract with you
To understand the profile of our membership	In our legitimate interests to meet our charitable objectives

- **Sign-up and login details:** Your username and password, and the time and date of your login and details about your computer and your ISP (see below for more information)

Purpose	Reason
To service your Account or membership	To perform our contract with you
To understand the use of our Site	In our legitimate interests to meet our charitable objectives

Correspondence:

If you correspond with us, we will process and store:

- **Name and contact details for correspondence:** Your name, phone number and/or e-mail address, and details of your and our correspondence.

Purpose	Reason
To service your request	To perform our contract with you. If we do not have a contract with you, for example because you do not hold an Account, or because your correspondence does not concern a contractual matter, then we will process your Personal Data in our legitimate interests to meet our charitable objectives
To understand the profile of our membership	In our legitimate interests to meet our charitable objectives

Participation in events:

If you choose to register for an event, we will process and store:

- **Participation details:** Your registration to attend events, and your attendance at those events.

Purpose	Reason
To deliver the event	To perform our contract with you
To monitor the attendance of our events to help us improve our services	In our legitimate interests to meet our charitable objectives

Paying for membership or events:

When you pay for membership or events, we will process and store:

- **Payment card details:** To process credit or debit card details, you will be directed to a payment form which is operated by our data processor, Stripe Payments UK Limited (“Stripe”). We will use this Personal Data for the following purposes:

Purpose	Reason
To accept payments from you	To perform our contract with you

Stripe is authorised and regulated by the Financial Conduct Authority as an Electronic Money Institution, and also acts as a controller in its own right. Stripe’s terms and privacy policy are available here: <https://stripe.com/gb/terms>. You can choose to request an invoice and pay by bank transfer or cheque if you prefer not to use a payment card.

Comments and forums:

- **Profile information and submissions:** If you participate in any interactive features of our website, such as comments or forums, we will process and store these comments, posts or other submissions that you make.

Purpose	Reason
To publish your contributions on our website, magazine and other media, which may include re-publishing them	To fulfil our charitable objectives, which are in the public interest

Note that we do not permit anonymous contributions. Any contribution that you make will display your name and other profile information about you. For more information, please contact us as set out below.

E-Learning:

- **Participation and submissions:** If you participate in any e-learning features of our website, we will process and store information concerning your responses to track and record your achievement.

Purpose	Reason

To deliver the e-learning content to you	To perform our contract with you
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Direct marketing:

- We provide regular email listing events, recent content and other information about SCL to those persons who have user accounts on our Site or who are or have been members.
- It is always your choice as to whether to receive marketing. You can ask us not to send you emails of this nature, by contacting us using the contact details below. You can also use your profile section in our website to choose not to receive emails.

What Personal Data do we share?

Purpose	Further information
We share your Personal Data with our service providers process your Personal Data for the purposes set out above and for the reasons listed above	In particular, we use several third-party service providers to help us with aspects of our operations. These include service providers to provide our IT services and infrastructure, to manage our accounts and to print and post our magazine.
We sometimes share your Personal Data with our trustees, volunteers or advisors	We are a charity, and our trustees and volunteers are typically partners or employees of third parties. We may, within our legitimate interests, share certain Personal Data by email to their organisational email accounts (for example, by forwarding emails received to SCL to our trustees' email accounts for action).
We sometimes share your name and affiliation with hosts of events	Events may be hosted by a third party. Many of our events are hosted by law firms or other organisations.. Sometimes, the host of the event requires your name and affiliation (for example your employer) as a way to identify you to grant access to their building, and in order to perform our contract with you we will need to share those details. The recipient will process that Personal Data as data controller. If you would like any assistance from SCL to understand how they use your Personal Data, please let us know, and we will refer you to the necessary person or department of the host.

<p>We sometimes share your name, contact details and affiliation, and other relevant Personal Data, with other members</p>	<p>As a membership organisation, we may share your Personal Data with other members where it is in our legitimate interests to do so. For example, we might share your contact details with members who are organising events or collating material for our publications, if we believe that you might have an interest in speaking or attending such event or contributing to such publication.</p>
<p>We may share your Personal Data for other purposes to help us comply with law or where it is in our legitimate interests to do so</p>	<p>We may share your Personal Data to meet any applicable law, regulation, legal process or enforceable governmental request; to enforce applicable legal terms and conditions or our other legal rights, including investigation of potential violations; to detect, prevent, or otherwise address fraud, security or technical issues or to protect against or prevent harm to the rights, property or safety of SCL, our members or the public as required or permitted by law.</p>

Where is your Personal Data stored and processed?

We will process and store your Personal Data in our membership database, email and office servers and equipment. We employ organisational and technical methods to protect your Personal Data.

We do not ordinarily transfer your Personal Data outside of the European Economic Area, except as follows:

- We use certain service providers as our data processors who are located outside or transfer your data outside of the European Economic Area (“EEA”). These include Xero (<https://www.xero.com/uk/about/terms/privacy/>), Mailchimp (<https://mailchimp.com/legal/privacy/>) and Postmark (<https://postmarkapp.com/eu-privacy>).
- Where we use such processors, we ensure appropriate safeguards are in place to protect your Personal Data. The appropriate safeguards that we rely on are ensuring that our processors are members of the EU-US Privacy Shield, details of which can be found at: https://ec.europa.eu/info/law/law-topic/data-protection/data-transfers-outside-eu/eu-us-privacy-shield_en, or the standard contractual clauses recognised by the EU Commission for this purposes (“SCCs”), details of which can be found at

https://ico.org.uk/media/1571/model_contract_clauses_international_transfers_of_personal_data.pdf. Please contact us using the details below if you would like further information.

- All connections to our Site are routed via a node (a “Cloudflare Node”) on our web application firewall provider CloudFlare Inc’s distributed network. This network allows us to deliver our Site to you more quickly, and to protect our server from direct access and attack. If you use our Site outside of the EEA, or if your connection is routed outside of the EEA, then you may connect to a CloudFlare Node outside of the EEA. If you are located inside the EEA, you will most likely connect to a Cloudflare Node that is also inside the EEA, although this is not guaranteed. CloudFlare acts as our data processor pursuant to an agreement with includes SCCs, but may also act as a data controller in its own right, for example to use your Personal Data to help differentiate between legitimate and malicious web traffic. For more details about how CloudFlare Inc. may collect or use your Personal Data please refer to: <https://www.cloudflare.com/security-policy/>

What security measures do we use?

We are committed to implementing technical and organisational security measures to keep your Personal Data safe. We regularly review them to help satisfy ourselves that they are in line with known and emerging risks, and to help prevent breaches.

How long do we keep your Personal Data?

We will not keep your Personal Data longer than reasonably necessary to fulfil the purposes described in this Privacy Policy and the Terms of Service or as prescribed by law. We endeavour to retain your Personal Data according to the following retention period policy:

Type of Personal Data	Retention period
Name and contact details, professional details, membership details, sign-up and login details, participation details and other membership details stored in our main Account database.	Up to two to three years following you ceasing to become a member. For visitors who do not become members, we will delete data between two and three years following your last interaction with us. In either case, certain details including basic contact details will be transferred to secure storage for up to seven years to help ensure that we retain knowledge of the operation of our charity.
The above Personal Data where it is recorded elsewhere than our	Up to seven years

membership database, for example in papers of Trustee board meetings.	
Financial and legal records, including details of your membership subscriptions and event attendance.	Up to seven years.

We may retain your Personal Data for longer where it is necessary for us to do so, for example in connection with a dispute or to evidence our compliance with law.

Your rights

You have the following rights in relation to the personal information we hold about you:

- **Your right of access**

If you ask us, we'll confirm whether we're processing your personal information and, if necessary, provide you with a copy of that personal information (along with certain other details).

- **Your right to rectification**

If the personal information we hold about you is inaccurate or incomplete, you are entitled to request to have it rectified. If you are entitled to rectification and if we've shared your personal information with others, we'll let them know about the rectification where possible. If you ask us, where possible and lawful to do so, we'll also tell you who we've shared your personal information with so that you can contact them directly.

- **Your right to erasure**

You can ask us to delete or remove your personal information in some circumstances such as where we no longer need it or if you withdraw your consent (where applicable). If you are entitled to erasure and if we've shared your personal information with others, we'll let them know about the erasure where possible. If you ask us, where it is possible and lawful for us to do so, we'll also tell you who we've shared your personal information with so that you can contact them directly.

- **Your right to restrict processing**

You can ask us to 'block' or suppress the processing of your personal information in certain circumstances, such as where you contest the accuracy of that personal information or you object to us. If you are entitled to restriction and if we've shared your personal information with others, we'll let them know about the restriction where it is possible for us to do so. If you ask us, where it is possible and lawful for us to do so, we'll also tell you who we've shared your personal information with so that you can contact them directly.

- **Your right to data portability**

You have the right, in certain circumstances, to obtain personal information you've provided us with (in a structured, commonly used and machine readable format) and to reuse it elsewhere or to ask us to transfer this to a third party of your choice.

- **Your right to object**

You can ask us to stop processing your personal information, and we will do so, if we are: (a) relying on our own or someone else's legitimate interests to process your

personal information, except if we can demonstrate compelling legal grounds for the processing; or (b) processing your personal information for direct marketing purposes.

- **Your right to withdraw consent**

If we rely on your consent (or explicit consent) as our legal basis for processing your personal information, you have the right to withdraw that consent at any time.

- **Your right to lodge a complaint with the supervisory authority**

If you have a concern about any aspect of our privacy practices, including the way we've handled your personal information, you can report it to the relevant Supervisory Authority.

Please note that some of these rights may be limited where we have an overriding interest or legal obligation to continue to process the data or where data may be exempt from disclosure.

Contacting Us

If you wish to access, correct, remove, or prevent processing of any of your Personal Data, please send your requests, or any questions about this Privacy Policy, to:

SCL Chief Executive: Caroline Gould

Email: caroline.gould@scl.org

Please be aware that in some cases we may not be able to process your request, for example, if it is technically impractical, risks the privacy of others, or causes a disproportionate burden on us.

However, we will do our best to respond promptly and comply with your requests.

Changes

We may update this Privacy Policy from time to time. We will post any Privacy Policy changes on our Site.

Cookies Statement

We use website tracking technologies (commonly known as "Cookies") as set out below.

How do you use Cookies?

We use three different categories of Cookies as follows:

- "Strictly Necessary Cookies"

These Cookies are an essential part of our log in system and other interactive parts of our website. They contain a "session ID" which is a unique number that identifies you to our site. We use them to make sure that you stay logged into our website from

page to page and can use our interactive features correctly. Without these cookies, services you have asked for, like reading full articles or booking seminars, cannot be provided.

These Cookies are not shared with third parties other than our website developers as necessary for them to support and develop the site.

Unless you ask us to remember you from visit to visit (in which case we will use a Cookie to do so), these Cookies will automatically expire shortly after the end of your visit to our site.

- "Security Cookies"

As noted in our Privacy Policy, we may protect our website using web application firewall provider CloudFlare Inc's services ("CloudFlare"). CloudFlare may place cookies on the browsers of your visitors to your CloudFlare-protected sites. CloudFlare does this to in order to track malicious visitors to our website and to other protected websites, to reduce the chance of blocking legitimate users, and to provide customized services. For more details please refer to: <https://www.cloudflare.com/security-policy/>

- "Performance Cookies"

We also use Cookies to track your visit, so that we can understand how many times our site is visited and how popular certain articles or pages are (i.e. the performance of our site). Our service provider is GoSquared. For more details please refer to <https://www.gosquared.com/legal/privacy/> Occasionally we may host other websites which use other service providers in a similar manner.

Certain Performance Cookies will be saved on your computer for up to two years following your last visit, in order to recognise your visits from time to time.

How do I disable cookies?

You can remove Cookies at any time by clearing these Cookies from your browser. You can also set your browser to refuse to accept Cookies. Refer to your browser's "Help" function for further details.

If you are interested in the topic of cookies more widely, our site contains several articles, news stories, blog posts and other information on this subject – just search for "cookies".