

ODN Europe takes its duty to process your personal data very seriously. This policy explains how we collect, manage, use and protect your personal data.

We do occasionally update this Policy, latterly for the [implementation of GDPR in May 2018](#), so please do return and review this Policy from time to time.

Refer to the sections below for more details on how and why we use your personal information:

- Who are we?
- The personal data we collect and how we use it
- What are your rights?
- Legitimate interests
- Retaining your information

#### **Who are we?**

ODNE Europe is a company registered in Scotland, registration number SC433171. Our Registered office is 15 Golden Square, Aberdeen, AB10 1WF

#### **What personal data we collect and how we use it**

What we need

ODN Europe is what's known as the 'controller' of the personal data you provide to us. We will usually collect basic personal data about you like your name, postal address, telephone number, email address and your bank details for subscription fees and ad hoc payments such as events. We will be very clear with you if we wish to collect further information, such as date of birth, and include our reason for collecting such information.

ODN Europe members' data is held on secure servers for the purpose of conducting membership business only. ODN Europe engages an agency ([CJ Association Management Ltd](#)) to provide its administrative secretariat support.

If you do not want us to use your data then you have the option to object to such use.

#### **Why we need it**

We collect your personal data for specific activities, such as project updates, newsletters, registration or membership requests, surveys and events. These are summarised as:

1. To provide you with information that we feel may be of interest to you (for example, to notify you about a forthcoming event).
2. To meet our contractual obligations to you.
3. To notify you about any changes to our website, including improvements, and service or product changes that may affect our website.

The information is either needed to fulfil your request or to enable us to provide you with membership services. If you choose to withhold requested information, we may not be able to provide you with all the member benefits.

### **E-newsletters**

We use a third party provider, MailChimp, to deliver our ODNE Europe e-newsletters. We gather statistics around email opening and clicks using industry standard technologies including clear gifs to help us monitor and improve our e-newsletter. For more information, please see [MailChimp's privacy policy](#)

### **Our marketing**

Sometimes we will process your personal data to provide you with information about our work or our activities that you have requested or are expecting.

On other occasions, we may process personal data when we need to do this to fulfil a contract (for example, if you have purchased an event ticket) or where we are required to do this by law or other regulations.

ODN Europe also processes your data when it is in our legitimate interests to do this and when these interests do not override your rights. Those legitimate interests include providing you with information on our activity updates, newsletters, registration or membership requests, feedback, competition entries and events. We may also include information on work with ODN Europe's partners, of direct relevance and interest to you. Please see the section on 'Legitimate Interest' for more information.

### **How we obtain your details**

We will also hold information about your details so that we can respect your preferences for being contacted by us.

We collect your personal information in a number of ways:

- When you provide it to us directly
- When you provide permission to other organisations to share it with us (including social media)
- When we collect it as you use our websites or apps (see website policy below)
- When you have given it to a third party and you have provided permission to pass your information on to us
- From publicly available sources

We combine the information from these sources with the information you provide to us directly.

### **Disclosing Your Information**

We may only disclose your personal information to third parties:

1. Where we outsource any or all of our activities to independent contractor(s), such as [CJ Association Management](#) Ltd;
2. Where we are legally required to disclose your information, for example in response to a mandatory request from law enforcement authorities;
3. To assist fraud reduction and minimise credit risks.

### **Membership applications**

When submitting a membership or supporter application, personal data will be required. Should an application be successful, all the policies and procedures outlined in this document will apply with regard to personal data retention. For those whose applications are unsuccessful, we only hold the information for a limited period after refusal and any personally identifiable details are removed.

### **Children**

If you are under 18 years of age please ensure you obtain your parent/guardian's consent before sending any personal information to ODN Europe. Please note we will not knowingly communicate to persons under 18 years without that written consent.

### **Geographic location of data storage**

All the personal data we hold is processed by our staff in the UK.

### **What are your rights?**

GDPR, implemented on 25<sup>th</sup> May 2018, gives all individuals a number of rights relating to their personal data held by companies, organisations and other third parties.

These are the Right:

- Of Access: Giving transparency over the information held about you, which will be provided to you within one month
- To be informed: Giving transparency over how your personal information is used
- Of rectification: The right to have your information updated or amended if it is wrong
- To restrict processing: You may ask to stop third parties using your information
- To be 'forgotten': Ask us to remove your personal information from our records
- To object: Object to the processing of your information for marketing purposes
- Of data portability: To obtain and reuse your personal data for your own purposes
- To withdraw from automated decision making and profiling: Not be subject to a decision when it is based on automated processing

If you would like to know more about your rights under the data protection law see the [Information Commissioners Office](#) website.

If you would like to change the way you hear from us or no longer wish to receive direct marketing communications from then use the contact form on our 'Contact Us' page or [email us](#).

### **Legitimate interests**

There are a number of lawful reasons that mean we can use (or 'process') your personal information, including 'legitimate interests'. Broadly speaking Legitimate Interests means we can process your personal information if:

1. We have a genuine and legitimate reason to do so  
and
2. We are not harming any of your rights and interests.

### **Sharing your information**

We will never sell your personal information to other organisations.

We only disclose information to third parties or individuals when obliged to by law, for purposes of national security, taxation and criminal investigations, and the following:

- If you have agreed we may do so;
- When we use other companies to provide services on our behalf, e.g. processing, mailing or delivering orders, answering questions, sending mail and emails or processing credit/debit card payments;
- If we receive a complaint about any content you have posted or transmitted to or from one of our sites, to enforce or apply our Terms & Conditions or if we believe that we need to do so to protect and defend the rights, property or personal safety of ODN Europe, our websites, our visitors, and for other lawful purposes.
- If we merge with another organisation to form a new entity, information may be transferred to the new entity;
- We may disclose aggregate statistics about our site visitors, to describe our services and operations to prospective partners, advertisers and other reputable third parties and for other lawful purposes, but these statistics won't include any personally identifying information.

### **Retaining your information**

We hold your information only as long as necessary for the purpose of completing the activity for which it was collated.

If you decide not to support ODN Europe or request that we have no further contact with you, we will keep some basic information in order to avoid sending you unwanted materials in the future and to ensure that we don't accidentally duplicate information.

### **Access to Information**

All individuals have the right to access personal information that is held about them. You can request a copy of any information that we hold about you. Please contact us if you wish to make such a request by emailing [info@odneurope.org](mailto:info@odneurope.org)

### **Information Collected from Website Visitors**

In running and operating this website ODN Europe may collect and process certain data and information relating to you and your use of this site. This information is anonymous and is used for analysing website traffic. For details, please see our Cookie Policy below.

Where we have given you (or where you have chosen) a password so that you can access certain parts of our site, you are responsible for keeping this password confidential.

### **Third Party Links**

You may from time to time find links to third party websites on our website. These websites should have their own privacy policies which you should check. We do not accept any responsibility or liability for their policies whatsoever as we have no control over them.

## Cookie policy

### Use of Cookies

Cookies are small text files sometimes used to improve the website experience of a visitor to a website. We may sometimes use cookies on this website to record aggregate statistical information about the visitors to our site and the use that our visitors make of the website. When collected this information is used by us to improve our website. Please note that no personally identifiable information is recorded.

All computers have the ability to decline cookies. You can easily decline or remove cookies from your computer using the settings within the Internet Options section in your computer control panel.

This data and information is detailed below:

1. When someone visits ODN Europe we use a third party service, Google Analytics, to collect standard internet log information and details of visitor behaviour patterns. We do this to find out things such as the number of visitors to the various parts of the site. This information is only processed in a way which does not identify anyone. Personally identifiable information will only be collected in a manner in which the site visitor is aware of, and will explain what we intend to do with it. You can find out more by visiting the [Google Analytics Cookie policy page](#).
2. Information that users provide to us as a result of filling in forms on our website, such as when a visitor registers for information. This is considered a conscious opt-in to receive communications from IFSF on matters relating to the organisation, its news and events.

### Managing your cookies

The links below will take you to the web browser's help page where you can manage your cookies:

- [Internet Explorer](#)
- Mozilla [Firefox](#)
- [Google Chrome](#)
- [Opera](#)
- [Safari](#)
- [Safari iOS](#)
- [Android](#)
- [Blackberry](#)
- [Windows Phone](#)

To [manage your Google Analytics cookies](#), you can visit the Google Analytics help page, however please keep in mind that information we obtain from Google Analytics goes towards improving the user experience on our site.

## Access to Information

All individuals have the right to access personal information that is held about them. You can request a copy of any information that we hold about you. Please [contact us](#) if you wish to make such a request.