

# South Downs Woodturners Privacy Policy

Adopted 8<sup>th</sup> January 2026

All previous Privacy Policies are rescinded and replaced by this document.

## 1. Club contact details

- 1.1. South Downs Woodturners (“the Club”, “Us”, “We”)
- 1.2. Beeding and Bramber Village Hall  
High Street  
Upper Beeding  
East Sussex  
BN44 3WN
- 1.3. [secretary@southdownswoodturners.com](mailto:secretary@southdownswoodturners.com)

## 2. The personal data we collect

- 2.1. The Club collects and maintains the following personal data about each member (“You”)
  - 2.1.1. First Name
  - 2.1.2. Last Name
  - 2.1.3. Postal address including postcode
  - 2.1.4. Email address
  - 2.1.5. Phone number
  - 2.1.6. GDPR documentation status
  - 2.1.7. Current membership status
  - 2.1.8. Current newsletter receipt status
  - 2.1.9. Current club competition level
- 2.2. The Club collects and maintains the following personal data about each tool library loan
  - 2.2.1. First name
  - 2.2.2. Last name
  - 2.2.3. Library item reference
  - 2.2.4. Loan date
- 2.3. The Club collects and maintains the following personal data when members use the Club website to purchase items or services
  - 2.3.1. First name
  - 2.3.2. Last name
  - 2.3.3. Email address
  - 2.3.4. Phone number
  - 2.3.5. Transaction datetime
- 2.4. Additional data may be recorded for one-off or non-routine Club activities including but not limited to
  - 2.4.1. Club auctions
  - 2.4.2. Club competitions

2.5. In such cases the only personal data collected are First name and Last name

### **3. The lawful basis for processing personal data**

- 3.1. Under the UK General Data Protection Regulation (UK GDPR), the lawful bases we rely on for processing your personal data are:
  - 3.1.1. Your consent
  - 3.1.2. The Club has a legitimate interest

### **4. How your personal data is stored and secured**

- 4.1. The Club uses Brevo to store data as referenced in paragraph 2.1
  - 4.1.1. The Club is the Data Controller and Brevo is the Data Processor
  - 4.1.2. This personal data is secured behind a username and password logon to Brevo.
  - 4.1.3. Brevo logon details are known to the Club's Chair, Secretary and Membership Secretary
  - 4.1.4. Brevo's Data Protection Policy is available here -  
<https://www.brevo.com/legal/privacypolicy/>
- 4.2. The Club uses Microsoft OneDrive to store data as referenced in paragraph 2.2
  - 4.2.1. The Club is both the Data Controller and Data Processor
  - 4.2.2. This personal data is secured behind a username and password logon to OneDrive
  - 4.2.3. OneDrive logon details are known to the Club's Tool Librarian
  - 4.2.4. Microsoft OneDrive's Data Protection Policy is available here -  
<https://learn.microsoft.com/en-us/sharepoint/onedrive-privacy-security-overview>
- 4.3. The Club uses SumUp to store data as referenced in paragraph 2.3
  - 4.3.1. The Club is the Data Controller and SumUp is the Data Processor
  - 4.3.2. This personal data is secured behind a username and password logon to SumUp.
  - 4.3.3. SumUp logon details are known to the Club's Chair, Secretary, Treasurer and Club members authorised to take SumUp payments for Club membership subscriptions as well as purchases made through
    - 4.3.3.1. The Club shop
    - 4.3.3.2. The Club raffle
    - 4.3.3.3. Other ad hoc purchases made at, but not limited to, craft fairs, demonstrations
  - 4.3.4. SumUp's Data Protection Policy is available here -  
<https://www.sumup.com/en-gb/privacy/>
- 4.4. The Club uses Microsoft OneDrive to store data as referenced in paragraph 2.4
  - 4.4.1. The Club is both the Data Controller and Data Processor
  - 4.4.2. This personal data is secured behind a username and password logon to OneDrive
  - 4.4.3. OneDrive logon details are known to the Club's Secretary

4.4.4. Microsoft OneDrive's Data Protection Policy is available here - <https://learn.microsoft.com/en-us/sharepoint/onedrive-privacy-security-overview>

## 5. Your data protection rights

5.1. Under data protection law, you have rights including:

5.1.1. **The right of access** – you have the right to ask us for copies of your personal information.

5.1.2. **The right to rectification** – you have the right to ask us to rectify personal information you think is inaccurate. You also have the right to ask us to complete information you think is incomplete.

5.1.3. **The right to erasure** – you have the right to ask us to erase your personal information in certain circumstances.

5.1.3.1. Your membership data described in paragraph 2.1 will be deleted on the second anniversary of the expiration of your most recent membership.

5.1.4. **The right to restriction of processing** – you have the right to ask us to restrict the processing of your personal information in certain circumstances.

5.1.5. **The right to object to processing** – you have the right to object to the processing of your personal information in certain circumstances.

5.1.6. **The right to data portability** – you have the right to ask that we transfer the personal information you gave us to another organisation, or to you, in certain circumstances.

## 6. How to contact the Club if you wish to make a request

6.1. A member shall request the exercise of their rights by contacting the Secretary via [secretary@southdownswoodturners.com](mailto:secretary@southdownswoodturners.com).

6.2. There is no fee payable for exercising your rights.

6.3. The Club has one (1) month to respond to you.

## 7. Complaints procedure

7.1. A member may make a complaint related to their personal data by contacting the Club Secretary via [secretary@southdownswoodturners.com](mailto:secretary@southdownswoodturners.com).

## 8. Breach procedure

8.1. If the Club is made aware of a data breach, it shall, as soon as possible,

8.1.1. notify all members of the breach.

8.1.2. work with the Data Processor to determine the scale, root cause, and remediation plan of the breach.

## 9. Information Commissioners Office (ICO) details

9.1. Information Commissioner's Office  
Wycliffe House  
Water Lane

Wilmslow

Cheshire

SK9 5AF

9.2. 0303 123 1113

9.3. [www.ico.org.uk](http://www.ico.org.uk)

Proposed for adoption at the Club Committee meeting to be held on 8 January 2026