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|  | **British Transport Police Federation**  **Privacy Policy**  **Last updated: 27 October 2021** |

**Introduction**

We are committed to protecting any personal information we obtain about you and this Privacy Policy sets out how we obtain, use and protect any personal information you provide to us, whether online, via phone, text, email, in letters or in other correspondence.

Whenever you provide such information, we are legally obliged to use your information in line with all laws concerning the protection of personal information, including the General Data Protection Regulations (EU 2016/279), Data Protection Act 1998 and the Privacy & Electronic Communications (EC Directive) Regulations 2003.

**Who we are**

British Transport Police Federation is the staff association for police Constables, Sergeants, Inspectors and Chief Inspectors in the British Transport Police. BTP Federation represents 2800 officers across Great Britain.

**Types of personal data we collect**

We may obtain (sensitive) personal data about you (such as your name, address, membership number, telephone number, rank, age, family, health, ethnicity, gender, lifestyle and social circumstances, education and employment and information regarding offences) when you complete an online or hard copy form and/or enquire about or access any representation or services.

For example, we will obtain your personal data when you update your contact details. We may also obtain sensitive personal data about you if you volunteer it during the completion of an online or hard copy form in relation to our provision of services or representation. If you volunteer such information, you will be consenting to our processing it for the purpose of providing this representation or service and other similar services to you.

We may monitor your usage of this website. This will not include tracking of your individual personal data. This data will be aggregated or statistical, which means that we will not be able to identify you individually.

The BTP Federation website contains hyperlinks to websites owned and operated by third parties. These third party websites have their own privacy policies, including policies on their use of cookies, and we urge you to review them. They will govern the use of personal information you submit or which is collected by cookies whilst visiting these websites. We cannot accept any responsibility or liability for the privacy practices of such third party websites and your use of such websites is at your own risk.

**Using your personal information**

We will use your personal data for the purposes of providing representation and services to you as a member, family of member, supporter, enquirer, employee, customer, service provider or professional consultant or representative of the British Transport Police Federation:

* to help us identify you and any accounts you hold with us
* providing representation
* providing current and future services of a similar nature
* fulfilling any legal obligations - contractual, regulatory or otherwise
* which we consider to be in your vital interest
* administration
* statistical analysis
* fraud prevention and detection
* to notify you any changes to our website or our services which we may make
* improving our services
* pursuing the legitimate interests of the BTP Federation
* marketing

**Sharing your personal information**

We will only use your information within BTP Federation for the purposes for which it was obtained. BTP Federation will not, under any circumstances, share or sell your personal data with any third party for marketing purposes.

We will comply with legal requests where disclosure is required or permitted by law (for example to government bodies for tax purposes or law enforcement agencies for the prevention and detection of crime), subject to such bodies providing us with a relevant request in writing and stating the legal requirement.

We may need to share your information with “data processors” such as our service providers, associated organisations and agents, or suppliers, who help us to prepare and send the materials relating to our work such as our email service providers.

In these situations, the relationship between BTP Federation and the third-party data processor will be governed by a contract and strict security requirements will be in place to protect your personal information. They will only act under our instruction and will not be allowed to use your data for their own purposes.

**How the law applies to BTP Federation’s use of personal information**

We are required under law to make sure that we have a valid ground for processing your data. The law sets out six different grounds for when personal data can be processed (plus additional ones where sensitive data is used) The three legal grounds that are most relevant to BTP Federation’s use of your personal information are:

* Consent
* Legitimate Interest
* Contract

**Overview**

BTP Federation will only process your personal information if any of the following apply:

* We have asked you for your express consent and have a record of this (for example, we will ask for your consent to send you marketing communications by email)
* We have a legitimate interest to do so. Our use will be fair and balanced and never unduly have an impact on your rights (for example, it is in our legitimate interests to analyse the data you provide so that we can improve our services and tailor our communications to you)
* We have a contract with you which we can only fulfil by using your personal information (for example, paying for a service we have purchased a service from you)

**Consent**

In some cases we will rely on consent, for example, to send you or create marketing emails. You can withdraw consent for these channels and activities by contacting us.

**Legitimate Interests**

This legal ground for processing means that we can process your personal information if we have a genuine and legitimate reason for doing so, and that reason is not overridden by your rights and interests as an individual.

Examples of the legitimate interests processing activities we undertake, or may undertake in the future, are:

* For administration purposes
* To conduct research
* To analyse data to better understand our members and tailor our communications to them

We have considered and balanced our legitimate interests against individuals’ privacy rights in these scenarios and we do not believe that any adversely affect the rights or interests of our members. If you would like to find out more or ask us to stop processing your data in these ways, you can do this at any time by contacting us.

**Contractual relationships**

In some cases, we will be in a contractual arrangement with you which means that we have to process your data in order to fulfil those obligations. Some examples of this include if you are providing a service to us for which payment is required.

**Keeping your data secure**

We will use appropriate technical and organisational measures to safeguard your personal data, for example:

* we store your personal data on secure servers
* where required, encryption, privacy and password protection are in place

Whilst we will use all reasonable efforts to safeguard your personal data, you acknowledge that the use of the internet is not entirely secure and for this reason we cannot guarantee the security or integrity of any personal data which are transferred from you or to you via the internet.

**Your data protection rights**

The accuracy of your information is really important to us. We want to ensure that we are able to communicate with you in ways that you are happy with, and to provide you with information that is of interest. If you wish to change how we communicate with you, or update the information we hold, then please email us: info@btpfed.co.uk

You have the right to request access to personal data which we may process about you and be provided with a copy (subject to exemptions defined within the Data Protection Act 1988). If you wish to exercise this right you should:

* put your request in writing
* include proof of your identity and address (e.g. a copy of your driving licence or passport, and a recent utility or credit card bill)
* specify the personal data you want access to, including any account or reference numbers where applicable.

You have the right to require us to correct any inaccuracies in your data free of charge. If you wish to exercise this right you should:

* put your request in writing
* provide us with enough information to identify you
* specify the information that is incorrect and what it should be replaced with.

You have the right to require the cessation of any personal data processing for the purpose of direct marketing. Details of this will be included on every direct marketing communication which we send to you. If you wish to exercise this right you should:

* put the request in writing

**Notification of changes to this policy**

This Privacy Policy may change from time to time. For example, we will continue to update it to reflect new legal requirements. Please visit this website page to keep up to date with the changes to our Privacy Policy.

**Contact us**

If you have any questions about this Policy, or about how BTP Federation manages your data please contact us. If you are unhappy with the content of this Policy, please talk to us directly so we can help resolve any problem or query.

Our Data Protection Officer is Mark Marshallsay and he can be reached on [Mark.Marshallsay@btpfed.co.uk](mailto:Mark.Marshallsay@btpfed.co.uk) You also have the right to contact the Information Commissioners Office (ICO) if you have any concerns about Data Protection using their help line 0303 123 1113 or at [www.ico.org.uk](http://www.ico.org.uk)

Policy last updated: 27 October 2021.

**I have read and understood the British Transport Police Federation Privacy Policy**

Name: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

Collar Number: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

Signature: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_­­\_\_\_\_

Date: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_