

# Privacy Policy

Overeaters Anonymous South and East England (OASEE) upholds our 12<sup>th</sup> Tradition of anonymity, and is committed to protecting the privacy of everyone who shares their personal information with us.

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## Scope of this policy

OASEE will process personal data of OA members and non-members. Individuals may subscribe to the newsletter, members may attend Intergroup meetings, and may act as Officers for Intergroup. Registers will be kept of meetings, and contact details saved to email accounts. If members arrange events or workshops and produce publicity material then this will be distributed and published to the website.

OASEE is committed to upholding the privacy of individuals whose personal information is being processed, and this policy describes how this commitment will be met. It applies to Intergroup officers, representatives, and OA members who deal with personal data on behalf of OASEE or in connection with OASEE.

This policy should be read in conjunction with the Data Protection Policy and the Information Security Policy.

## General principles

OASEE takes full responsibility for the personal information we process. Privacy will be protected, and personal information never disclosed, unless with explicit consent, or where this is to a data processor (like Dropbox, or our website hosts) or where this is required by law. We will only use personal data for the purpose which it was disclosed, and securely delete / destroy it once it is no longer required.

## Intergroup Officers and Representatives

Officers and Representatives will supply their contact details to OASEE so that they can be contacted in order to fulfil their role within OA. If their contact details change they should notify the Executive Secretary ([secretary@oasouthandeastengland.org.uk](mailto:secretary@oasouthandeastengland.org.uk)) so that the records can be updated.

The details of the officers / representatives will be held on record for one year after they have left their role. If they have signed a register of attendance at meetings then this record will be kept for one year after the meeting. Details will not be shared with third parties, save that email addresses will (in the course of their use) be shared with email providers, and information will be held on Dropbox.

If any officer or representative would like to object to the processing of their data, or request that processing be restricted, they should do so in writing to the Chair of OASEE.

## Events flyers

OA members sometimes supply their contact details in flyers and promotional material for events and workshops. The flyers supplied to OASEE for this purpose will be published on the website. A record will be kept of what information is provided. Once the event has passed then the flyer will be removed from the website, and a request made for Google to delete the record of the flyer.

The website is hosted by Global Gold, and therefore the contact information in the flyers will be processed by Global Gold on behalf of OASEE. Once the flyer has been deleted from the website then it is no longer in the possession of Global Gold.

If the OA member wishes to have the flyer removed prior to the event then they should contact the Chair of OASEE who will direct the Website Officer to ensure that the flyer is removed.

## Data subject rights

Under the GDPR, data subjects (people whose data is being processed), have several rights:

- a) The right to [know](#) what data has been collected about them, and how such data has been processed
- b) The right to [make changes](#) to inaccurate data
- c) The right to [withdraw consent](#) to data processing
- d) The right to ask for data to be [deleted](#)
- e) The right to [object](#) to data processing, or for it to be [restricted](#)
- f) The right to [data portability](#) (this only applies to automated processing, which does not happen in the context of OASEE)
- g) The right to [complain](#) to the Information Commissioners Office

If you would like to exercise any of these rights then please contact the Chair of OASEE.

## Right to access information

Individuals have the right to access any personal data that relates to them which OASEE holds, and to be given the following information:

- The reason why the data is held
- The source of the data (if not directly from the individual themselves)
- Whether it has been disclosed to anyone else, and if so, who
- How long it will be stored
- The right to request that the data be updated, or deleted, or processing restricted in any way
- The right to lodge a complaint to the [Information Commissioners Office](#)
- Whether any automated decision-making was used to process the data

This is called a 'subject access request'. Any person who wishes to exercise this right should contact the Chair of SEEIG via email ([chair@oasouthandeastengland.org.uk](mailto:chair@oasouthandeastengland.org.uk)). The information should be provided within 30 days, without charge. The Chair will always verify the identity of anyone making a subject access request before handing over any information.

### *Process for subject access requests*

Any subject access requests should be forwarded to the Chair of OASEE, who should record them in the SAR template.

The individual making the request should be contacted and their identity confirmed, if necessary by a telephone conversation, or by being asked to supply written evidence of their identity.

The Chair should collaborate with other Officers to identify all information which is held concerning the subject. OA does not collect a great deal of personal data, and so it is likely that the information will be limited to their attendance at meetings, and their subscription to the newsletter, however if the person has been an Officer or Intergroup representative then there may be more information, including emails from them and concerning them.

All material should be reviewed and an assessment made of whether it can be immediately disclosed, or whether disclosure may adversely affect the rights and freedoms of another individual. Information about a third party should not be disclosed, and this can be edited out of documents.

Nothing should be disclosed that might prejudice a legal investigation, or where disclosure would breach some other legal duty. Specialist advice should be sought if there is any concern about whether disclosure should not be made.

The general rule is that material should be disclosed within 30 days of the request being made, although if it will take longer to prepare the disclosure then the subject should be contacted within 30 days, and informed of the delay and likely timescale for disclosure. Disclosure must be made within 90 days of the request.

If no information is held about the data subject then they should be informed.

If information is held but no disclosure is made then the data subject should be informed that no action will be taken on their request, and that they have the right to complain to the ICO.

A brief description of the disclosure should be recorded in the SAR template, together with the timing of any disclosure, and any non-disclosed material, with reasons given for non-disclosure.

## Archiving and retention

Personal data should only be stored for the minimum period necessary, consistent with the purpose for which it was processed. Once the retention period has elapsed it is the responsibility of the person controlling the data to delete it. Officers are responsible for managing their own Dropbox folders and email accounts, and Intergroup representatives responsible for their group's email addresses.

Description of data	Period to keep
Contact details for Intergroup Officers	1 year after leaving office
Register of Intergroup meeting attendance	1 year after attend meeting
Contact details for Intergroup representatives	Anonymous emails are preferred for meeting representative (e.g. GreenwichSatAM.gmail). Otherwise, personal contact details of the representative are kept until they inform OA that they are no longer the representative, or until this information is received from the OA group, or a new representative
Emails	1 year after email received or sent
Financial records (including emails)	6 years after end of financial year to which they relate
Events agenda packs	6 years after event, to enable follow up and accountability, including financial accountability
Dropbox folder contents	Officer access to Dropbox deleted by Dropbox Admin once handover period finished Contents of folders deleted in accordance with this table

## **Version**

This policy was drafted on 15<sup>th</sup> April 2018, and approved by the OASEE Intergroup on [INSERT DATE]. It should be reviewed by 31<sup>st</sup> May 2019.

Any questions about this policy or any queries concerning data protection matters should be raised with the Chair of SEEIG ([chair@oasouthandeastengland.org.uk](mailto:chair@oasouthandeastengland.org.uk))