

The Police federation of England and Wales and Devon & Cornwall Police Federation is committed to safeguarding the privacy of everyone who uses our services. This policy sets out how we will use your personal data.

This policy reflects our duties under the General Data Protection Regulation 2016 (GDPR), the Data Protection Act (1998) and all applicable Privacy and Electronic Communication Regulations. It describes how we use personal data fairly, keep it secure, make sure it is accurate and uphold your rights as a data subject.

This policy does not apply to other organisations to which we may link and whose privacy policies may differ.

Please read the following policy to understand how your personal information will be treated. It may change from time to time, so please check back periodically. It was last updated in July 2018.

### **Who we are**

The General Secretary of the PFEW is the Data Controller for centrally processed data and the Branch Secretary of Devon & Cornwall Police Federation is the data controller for locally processed data.

The PFEW Data Protection Officer can be contacted at:

Police Federation of England and Wales

Federation House, Highbury Drive, Leatherhead, Surrey, KT22 7UY

Email: [GDPR@polfed.org](mailto:GDPR@polfed.org)

Phone: 01372 352059

The DEVON & CORNWALL POLICE FEDERATION data controller can be contacted at.

DEVON & CORNWALL POLICE FEDERATION

2 River Court, Pynes Hill, Exeter, EX2 5JL

fedoffice@devon.polfed.org

## **How the POLICE FEDERATION of ENGLAND and WALES and DEVON & CORNWALL POLICE FEDERATION uses your personal data**

We routinely use your personal data for the following purposes:

- Registering you as a POLICE FEDERATION member.
- Contacting you about your membership and about essential staff association activities.
- Representing you effectively for example in misconduct cases, and pension and equality matters.
- Meeting our legal obligations as a staff association.
- Acting in accordance with the [Police Federation of England and Wales rules and regulations](#).

The lawful basis for this processing is DEVON & CORNWALL POLICE FEDERATION pursuing our legitimate interests as a staff association. We may also use legitimate interest as our lawful basis for the following data processing:

- Holding your data on our membership database.
- Processing your subscription payments.
- Confirming your identity when you contact us.
- Sending you communications
- Sending you a membership magazine.

- Ensuring where you have a vote in all applicable POLICE FEDERATION OF ENGLAND & WALES and DEVON & CORNWALL POLICE FEDERATION elections and ballots that you are eligible to vote in.
- Member representation (this could be representing you individually or collectively) and case work.
- Equality monitoring.
- Statistical analysis of our membership and of employers and workplaces.

### **Accessing your personal data within DEVON & CORNWALL POLICE FEDERATION**

Some of your personal data will be available to DEVON & CORNWALL POLICE FEDERATION's employees, Branch Council members, and others formally instructed by DEVON & CORNWALL POLICE FEDERATION for the purposes of carrying out staff association duties.

The type of personal data shared will be relevant to the purpose for which the data is used, so for example, unless you have expressly asked us not to, workplace representatives will be given your workplace details and contact details such as e mail address and telephone numbers.

### **Data security**

DEVON & CORNWALL POLICE FEDERATION uses industry standard efforts to safeguard the confidentiality of your personally identifiable information, such as firewalls and SSL (secure socket layers). We make every effort to protect the loss, misuse and alteration of information under our control. However, data transmission over the internet is inherently insecure, and we cannot guarantee the security of data sent over the internet.

### **Sharing your personal data with third parties**

By third parties, we mean organisations that are not THE POLICE FEDERATION OF ENGLAND & WALES or DEVON & CORNWALL POLICE FEDERATION.

We share your information with third parties such as:

- Group Insurance providers
- Payroll department of Devon & Cornwall Constabulary

When we share your data, we only share the minimum required for the purpose of the data processing. We also ensure that processes are in place so that data is always transferred to third parties securely.

The third parties we share data with are:

For all DEVON & CORNWALL POLICE FEDERATION OR GROUP INSURANCE MEMBERS:

- Your employer, Devon & Cornwall Constabulary.
- Police Federation of England & Wales
- George Burrows Insurance brokers (provider of the group insurance scheme)
- Panel Solicitors or other nominated legal service providers as selected by us— if POLICE FEDERATION OF ENGLAND & WALES or DEVON & CORNWALL POLICE FEDERATION refers a case in which you are involved for legal advice.
- We may share (either directly or through **brokers**) your **personal information**, including **sensitive personal information**, with companies who provide services to Devon & Cornwall Police Federation and for each other in respect of risks **underwritten** by George Burrows and with insurers who cover Devon & Cornwall Police Federation under its group insurances policies. They will use your data to assess and deal with insurance claims and to meet legal obligations. They will keep your data for the period necessary for these purposes and may need to disclose it to other companies within their group, their agents and third party **service providers**, law enforcement and regulatory bodies.
- We can supply on request further details of the reinsurers and insurers we provide your data to and how this information may be used. If you require further details contact us.

We may share personal data with organisations working to detect or prevent crime, such as the police.

### **Transfers overseas and safeguards**

We don't routinely transfer your data outside of the UK. Where it is necessary, we ensure appropriate data protection measures are in place.

### **Retention of data**

Retention means how long we keep your data for. We do this in accordance with DEVON & CORNWALL POLICE FEDERATION's data retention policy. This includes:

- Application form – this is scanned electronically and then destroyed. The electronic record is retained for 7 years after membership lapses and then securely destroyed.
- Membership record – retained for seven years after membership lapses, then minimised.
- Case files – retained for seven years after the case is closed, then securely destroyed.

If you would like to know more or see the PFEW and DEVON & CORNWALL POLICE FEDERATION's full data retention policy, please email [fedoffice@devon.polfed.orf](mailto:fedoffice@devon.polfed.orf) or view our website.

### **Your rights as a data subject**

You have rights as a data subject. These rights are:

1. **The right to be informed** – this means we must inform you how we are going to use your personal data. We do this through this privacy policy and by informing you how your data will be used each time we collect it.
2. **The right of access** – you have the right to access your personal data (e.g. data that is about you) that we hold. This is called a subject access request.

We must respond to your request within one month. To request access to your data, please email [gdpr@polfed.org](mailto:gdpr@polfed.org). It is very helpful if you tell us what of your personal data you are seeking.

3. **The right to rectification** – if you think the data we hold on you is incorrect, tell us so we can put it right. You can do this by email [foi@polfed.org](mailto:foi@polfed.org)
4. **The right to erasure** – you have the right to request that we delete your data. We will do so, provided that we do not have a compelling reason for keeping it. To request this, please email [foi@polfed.org](mailto:foi@polfed.org)
5. **The right to restrict processing** – you can change your communication preferences (therefore restricting how we communicate with you) by emailing [foi@polfed.org](mailto:foi@polfed.org)
6. **The right to data portability** – you can obtain and reuse your personal data for your own purposes. To request this, please email [gdpr@polfed.org](mailto:gdpr@polfed.org)

You may only exercise this right where we use your **personal information** in order to perform a contract with you, or where we asked for your consent to use your **personal information**. This right does not apply to any **personal information** which we hold or **process** based on our **legitimate interest** or which is not held in digital form.

7. **The right to object** – you have the right to object to

**a) Direct marketing from DEVON & CORNWALL POLICE FEDERATION.**

You can opt out of direct marketing any time by contacting DEVON & CORNWALL POLICE FEDERATION Direct on 01392 354770 or email [fedoffice@devon.polfed.org](mailto:fedoffice@devon.polfed.org). There will also be instructions on how to unsubscribe included in any direct marketing message that we send to you.

**b) Any processing where our lawful basis is legitimate interest (see above).** If you would like to formally object to any of our legitimate interest processing, please email [gdpr@polfed.org](mailto:gdpr@polfed.org)

8. **Rights in relation to automated decision making and profiling** – this is not something we do at DEVON & CORNWALL POLICE FEDERATION. If that ever changes, this policy will be updated accordingly.

At DEVON & CORNWALL POLICE FEDERATION we are committed to upholding your rights as a data subject. If you think we have not done so, please contact [fedoffice@devon.polfed.org](mailto:fedoffice@devon.polfed.org)

You may also complain to the Information Commissioner's Office (ICO) if you believe your rights have not been upheld. The ICO is the data protection regulator and their website is: [www.ico.org.uk](http://www.ico.org.uk).

## **Consent**

There are some types of data processing that we only do if you have given us your consent. These are:

- Sending direct marketing messages by email or by post. For example we send a diary to you in the post every year.

You are in control of what consent you give us. You can withdraw your consent at any time by contacting Devon & Cornwall Police Federation.

## **Statutory data requirements**

As a staff association, we have a statutory requirement to keep an accurate register of members' names and addresses. If you wish to be a DEVON & CORNWALL POLICE FEDERATION member and / or a member of the Group Insurance scheme, you must provide this information to us.

## **Data collected on our website**

Personal data collected by this website will only be used for the purposes (or closely related purposes) for which it was collected.

We may use your personal information to:

- Deal with enquiries relating to your membership as a Police Federation and / or Group Insurance member.
- Deal with enquiries that you raise with us.

- Deal with enquiries and complaints made by you relating to the website.

## **Email**

You can unsubscribe from emails at anytime by e mailing at [fedoffice@devon.polfed.org](mailto:fedoffice@devon.polfed.org) writing to us at our office address.

## **Cookies**

When on our website, we do not use cookies and do not collect any data about you.

## **Social media buttons**

On many of the pages of the site you will see 'social buttons', such as share buttons for Twitter, and Facebook 'Like' buttons.

When you click on any of these buttons, these sites will be registering that action and may use that information.

You should check the respective policies of each of these sites to see how exactly they use your information and to find out how to opt out, or delete, such information.

## **Facebook advertising**

From time to time we may use Facebook advertising to promote POLICE FEDERATION OF ENGLAND & WALES & DEVON & CORNWALL POLICE FEDERATION events and campaigns and encourage people to join DEVON & CORNWALL POLICE FEDERATION and member services such as the Group Insurance. We do not collect any personal data from Facebook profiles. We do not use your member data to target our advertising on Facebook. We do not provide or sell member data to third parties for the purposes of Facebook marketing. To no longer receive Facebook ads [click on the top right hand corner of the ad](#)



## **External web services**

We use a number of external web services on the DEVON & CORNWALL POLICE FEDERATION site, mostly to display content within our web pages. For example, to display images we sometimes use Flickr; to show videos we use YouTube. This is not an exhaustive or complete list of the services we use, or might use in the future, when embedding content, but these are the most common.

As with the social buttons, these sites may use information about usage of embedded content. If you are not logged in to these external services, then they will not know who you are but are likely to gather anonymous usage information e.g. number of views, plays, loads etc.