

SPECIAL AIR SERVICE REGIMENTAL ASSOCIATION

PRIVACY NOTICE

The Special Air Service Regimental Association (“we” “us” “our” or “SAS Regimental Association”) respects your privacy and is committed to protecting your personal data. This privacy notice explains how we look after your personal data if you are a member or relative of a member (or apply for membership) of the SAS Regimental Association, if you visit our office, shop, or if you visit our website (www.marsandminerva.co.uk).

We may update this privacy policy from time to time – you can find also find our latest policy on our website at (www.marsandminerva.co.uk) or by asking us for a copy.

1. IMPORTANT INFORMATION

The SAS Regimental Association is the data controller and responsible for your personal data.

If you have any questions about this privacy notice or how we use your data, including any requests to exercise your legal rights, please contact our data manager using the following details:

Address: The Occupier, PO Box No 35051, LONDON NW1 4AF

Third-party links

Our website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy notice of every website you visit.

2. THE DATA WE COLLECT AND HOW WE COLLECT IT

The data we collect

Depending on your relationship with us, we collect, use, store and transfer some or all of the following data:

- **Identity Data:** includes your names, date of birth, marital status, title, and gender;
- **Contact Data:** includes your postal address, email address and telephone number;
- **Service Data:** details of your military service history, including regiments you served with and the dates you served, rank and service number, theatres where you served, and any awards or honours;
- **Financial Data:** including bank account details where you make a payment by bank transfer;
- **Transaction Data:** details of goods you purchase from us off our shop list;
- **Technical Data:** information we collect automatically when you visit our website, including your IP address, browser details, and device details;

- **Marketing and Communications Data:** includes your preferences in receiving marketing from us and your communication preferences.

Where we need to collect personal data by law, or to provide membership benefits to you, and you fail to provide that data when requested, we may not be able to provide some of our benefits to you. But if this is the case, we will notify you at the time.

Sensitive Data

We may also collect, store and use information about your health, including details about any medical condition and welfare reports, which are all particularly sensitive data.

Where we collect your data from

We may collect your data from different sources:

- We collect data which you give to us when you apply to be a member, when you buy items from our shop list, or when you otherwise interact with us;
- We may collect data from members about their relatives (e.g. details of next of kin and dependants);
- We collect sensitive health data from you directly, your relatives, SSAFA, The Royal British Legion and any medical advisor appointed to review your welfare needs;
- We may collect Technical Data automatically when you interact with our website, by using cookies and other similar technologies.

3. HOW WE USE YOUR PERSONAL DATA

We will only use your personal data when the law allows us to.

We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us using the details above if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

Purpose/Activity	Lawful basis for processing including basis of legitimate interest
To assess and (if appropriate) complete your application for membership.	Legitimate Interests (to determine whether to admit you as a member of the SASRA)
To provide you with goods through our shop list	Performance of a contract with you
To assess your welfare needs and to determine whether to provide financial or other assistance to you. This includes liaising with medical advisors	Legitimate interests (to allow us to make informed decisions about the benefits we provide to members).

To share information governmental and law enforcement agencies in emergency situations	Protect your vital interests or that of another natural person.
To contact you about your relatives or next of kin.	Legitimate Interests (to assist in performing our charitable objects)
To carry out administration in connection with the provision of goods to you, including managing payments, fees and charges.	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to recover debts due to us)
To manage our relationship with you as a member of the SASRA, which will include: (a) Notifying you about changes to our terms or privacy policy (b) Asking you for feedback	Necessary for our legitimate interests (to keep our records updated and to study how members use our assistance and interact with us)
To administer and protect our organisation and our website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	(a) Necessary for our legitimate interests (for running the SASRA, provision of administration and IT services, network security, to prevent fraud and in the context of a restructuring exercise) (b) Necessary to comply with a legal obligation
To use data analytics to improve our website, marketing, member relationships and experiences	Necessary for our legitimate interests (to keep our website updated and relevant, to develop our organisation and to inform our marketing strategy)
To update you about developments in the SASRA, to give you details of products which might be of interest to you, or invite you to lunches and events.	(a) Consent (where you have provided positive consent) (b) Necessary for our legitimate interests (to develop our organisation and provide information to our members).

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose.

In addition, we may process your personal data without your knowledge or consent, where this is required or permitted by law.

Sensitive Data

Where we hold particularly sensitive data, such as your medical information, we will only use this for reviewing what welfare support or grants we may provide to you.

Marketing

You may receive communications from us in respect of the SAS Regimental Association and its members (including notices of deaths), books or other products that we think may be of interest to you, and lunches and events which we think may be of interest to you. We send these by post and/or email, depending on your

contact preferences. You will only receive these communications by email if you have opted to receive them from us by email.

We do not share your contact details with any third party for the purpose of that third party sending marketing.

You can ask us to stop sending you marketing messages at any time by following the opt-out links on any marketing message sent to you or by contacting us using the details above at any time.

4. DISCLOSURES OF YOUR PERSONAL INFORMATION

We may have to share your personal data with the parties set out below for the purposes set out in the table in paragraph 3 above:

- **Other armed forces charities** including, but not limited to, SSAFA and The Royal British Legion.
- **Medical report providers** and medical professionals, for the purpose of carrying out welfare reports.
- **Our service providers** based within the UK or wider EEA who provide IT and system administration services, or who store documents on our behalf.
- **Our professional advisers** including lawyers, bankers, auditors and insurers based in the UK or EEA who provide consultancy, banking, legal, insurance and accounting services.
- **Event Organisers** where you agree to attend an event.
- **HM Revenue & Customs**, crime prevention agencies, and other authorities based in the UK who require reporting of our processing activities in certain circumstances.
- **The Ministry of Defence and Police**, where they ask for confirmation of your identity or service history in an emergency situation.
- **New legal entity** if we merge with, or form, a new body to replace or work with the SAS Regimental Association. If such a change happens, then the new body may use your personal data in the same way as set out in this privacy notice.

We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

5. INTERNATIONAL TRANSFERS

We may transfer your personal data to third parties providing services to us who are based outside of the European Economic Area (EEA). This includes parties providing IT administration services and hosting services, and parties providing assistance with managing our marketing databases.

Whenever we transfer your personal data outside of the EEA, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

- Transferring data to countries that have been deemed to provide an adequate level of protection for personal data by the European Commission;
- using specific contracts approved by the European Commission which give personal data the same protection it has in Europe; or
- for providers based in the US, we may transfer data to them if they are part of the Privacy Shield.

6. DATA RETENTION

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

For example, we will keep your personal data for life if you are a member, but if you make an unsuccessful application for membership, we will only keep your data for 12 months from the date your application was rejected. We will keep welfare reports for 10 years. Full details of our retention policy are available on request from our data manager.

7. YOUR LEGAL RIGHTS

Under certain circumstances, you have rights under data protection laws in relation to your personal data. These rights are set out below. If you wish to exercise any of the rights set out above, please contact our data manager using the contact details above.

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

Complaint to the ICO

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues (www.ico.org.uk). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

Your legal rights

Your legal rights are as follows:

- **Request access** to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.
- **Request correction** of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected.
- **Request erasure** of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below).
- **Object to processing** of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to

processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes.

- **Request restriction of processing** of your personal data. This enables you to ask us to suspend the processing of your personal data in certain circumstances, for example if you want us to establish its accuracy or the reason for processing it.
- **Request the transfer** of your personal data to you or to a third party.
- **Withdraw consent at any time** where we are relying on consent to process your personal data, although this may mean we are unable to provide certain benefits or assistance to you.