



DATA PRIVACY NOTICE

1. Who are we?

The 1877 Society Limited t/a SMiSA (St Mirren Independent Supporters Association). We are a Registered Society under the Co-operative and Community Benefit Societies Act 2014. Our Registered Number is 2624RS. SMiSA is a not for profit organisation.

2. Your personal data – what is it?

Personal data is any data which by itself or with other data available to data processors can be used to identify individuals. From 28th May 2018, the processing of personal data is governed by the General Data Protection Regulation (“GDPR”).

We keep only such limited personal data as was provided by members when they signed up to become members. We require to keep this in order to maintain your membership of SMiSA, and to keep you informed of news and events. We do not hold any sensitive personal data.

The personal data that we collect from members is detailed in the following table:

	Own Records	Payment Processors			Communication Processors	
	Member Database	Gocardless	Santander	Paypal	Election Runner	Mailchimp
Name	✓	✓	✓	✓	✓	✓
Address		✓				
Email Address	✓	✓		✓	✓	✓
Business Name	✓					
Family Member						
Member Number (new)	✓	✓				✓
Member Number (old)	✓					
Buy the Buds status	✓					
Membership Category	✓	✓		✓		
Subscription Amount	✓	✓	✓	✓		
Payment Type	✓					
Payment Date	✓	✓	✓	✓		
Payment Record	✓	✓				
Date Joined	✓	✓				
Date Left	✓	✓				
Bank Account details		✓	✓	✓		
Email delivery statistics					✓	✓
Survey activity						
Activity type and level of access	SMiSA now uses the VeryConnect membership system for administration of	SMiSA invite, cancel or amend subscriptions. We have no access to member bank account details	SMiSA has no access. Maintained by members at their bank branch.	SMiSA has limited access to invoice or reactivate payments	Used purely for member ballots. SMiSA can add/remove members	Used purely for bulk emailing of members. SMiSA can maintain email addresses but no other data

3. How do we process your personal data?

SMiSA complies with its obligations under the “GDPR” by keeping personal data up to date; by storing and destroying it securely; by not collecting or retaining excessive amounts of data; by protecting personal data from loss, misuse, unauthorised access and disclosure and by ensuring that appropriate technical measures are in place to protect personal data.

4. What do we use your personal data for ?:-

- To perform our contract with you as a member of SMiSA
- To enable us to administer membership records;
- To enable us to collect member subscriptions;
- To maintain our own accounts and records
- To inform you of SMiSA news, events, activities and services

5. What is the legal basis for processing your personal data?

As majority owners of St Mirren FC our purpose is to invest in the club over the long-term with the aim of safeguarding the club for future generation of supporter. The retention and processing of your data is necessary to allow us to collect fees and carry out our obligations to you as a member of SMiSA.

6. Sharing your personal data

Your personal data will be treated as strictly confidential and will not be shared with other organisations without your consent.

7. How long do we keep your personal data ?

We keep data of all active members as long as required for the purposes of their membership. We will move data relating to former members to a separate secure suppressed list, but will not contact them without seeking their consent to opt-in to such communications.

8. Your rights and your personal data

Unless subject to an exemption under the GDPR, you have the following rights with respect to your personal data: -

- The right to request a copy of your personal data which SMiSA holds about you
- The right to request that SMiSA corrects any personal data if it is found to be inaccurate or out of date;
- The right to request your personal data is erased where it is no longer necessary for SMiSA to retain such data;
- The right to withdraw your consent to the processing at any time
- The right, where there is a dispute in relation to the accuracy or processing of your personal data, to request a restriction is placed on further processing;
- The right to lodge a complaint with the Information Commissioners Office.

9. Further processing

If we wish to use your personal data for a new purpose not covered by this Notice, then we will seek your prior consent to the new processing and provide you with a new notice explaining this new use prior to commencing the processing and setting out the relevant purposes and processing conditions.

10. Contact Details

For all queries, or to exercise all relevant rights, or to raise complaints please in the first instance contact us at contact@smisa.net.

For further information about GDPR you can contact the Information Commissioners Office on 0303 123 1113 or via email <https://ico.org.uk/global/contact-us/email/> or at the Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire. SK9 5AF.

11. Third Party Data Providers

SMISA will continue work with our service providers to ensure that they remain compliant with the GDPR where relevant. For more information about how these services use your data, see below and use the links provided for up to date information.

Gocardless is now GDPR compliant and UK registered for Data Protection. For more information see <https://support.gocardless.com/hc/en-gb/articles/360000281005-GoCardless-and-GDPR>.

VeryConnect's Privacy Policy can be found here : <https://www.veryconnect.com/privacy-policy>

MailChimp's [Data Processing Addendum](#) meets the requirements of the GDPR.

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