

BRITISH GERMAN JURISTS' ASSOCIATION

PRIVACY NOTICE

1. Introduction and how to contact us

The British-German Jurists' Association ("BGJA") respects your privacy and is committed to protecting your personal data. This Privacy Notice provides information on how we collect and process your personal data and tells you about your privacy rights and how the law protects you.

The BGJA is the data controller and accepts responsibility for the processing of your personal data in accordance with the terms of this Privacy Notice and the requirements of the law.

If you have any questions about this Privacy Notice or our data protection practices please contact our Administrator or Hon. Secretary, whose contact details are given below.

Title:	The Administrator	The Hon. Secretary
Postal address:	British German Jurists Association	British German Jurists Association TWM Solicitors LLP 65 Woodbridge Road Guildford Surrey GU1 4RD
Email address:		peter.stevens@twmsolicitors.com
Telephone number:		(+44) (0) 1483 752750 (office) (+44) (0) 1483 752750 (direct)
Fax number:		(+44) (0) 1483 752899

We keep our Privacy Notice under regular review. This version was last updated on 15th July 2019.

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), which is 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.

2. Who we are

The BGJA is a group of several hundred lawyers and other professionals interested in British-German legal practice. Our membership includes solicitors, barristers, judges, lecturers, notaries, diplomats, members of chambers of commerce and bankers. Our constitutional aims are to promote in Britain the study and knowledge of German Law and the German legal system; to encourage and facilitate the education of British and German Lawyers in the study and practice

of German and British Law; to arrange lectures and seminars in the U.K. and Germany; to cultivate personal and professional relations between members of the profession in both countries; and to co-operate with our sister organisation, the Deutsch-Britische Juristenvereinigung e.V (or “**DBJV**”) for these purposes.

We hold a joint conference each year with the DBJV, either in Britain or in Germany. Talks are given from both the British and German points of view and members participate in exchanging information and experience on a wide range of practical topics.

We also arrange occasional lectures and social events for members, mainly in London, often in conjunction with other bi-lateral associations.

3. The information we collect about you, how we use it and the legal justification

An important part of our work is communicating with our members, telling them about our activities and how we are supporting their interests, and seeking their views on current issues. We use personal information to keep in touch with our members.

We may communicate with you by post, email, text message or telephone, using the contact information you have given us.

“**Your personal data**” means any information which identifies you, or which can be identified as relating to you personally, such as your name, address, phone number and email address. We will collect and use your personal data only when the law allows us to. Most commonly, we will use your personal data where:

- we need to do so to provide you with information you have requested about us or our activities, or to deliver the benefits and facilities to which you are entitled as a member of the BGJA;
- it is necessary to do so for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests;
- we need to do so to comply with a legal obligation.

We do not share your personal data with third parties, although we may occasionally send you information about events organised by others, such as the DBJV, German Embassy, British-German Association, or other bi-lateral associations, which we think may further our objectives or be of interest to our members. If you do not wish to receive information about events organised by third parties, please contact us and let us know.

Generally, we do not rely on consent as a legal basis for processing your personal data. We believe that communicating with you is in both of our legitimate interests and is necessary for the purpose of fulfilling our objectives as a membership organisation. However, we will get

your consent before sending third party direct marketing communications to you via email or text message. You can contact us to ask to stop sending you marketing messages at any time.

We may also collect, use and share aggregated data such as statistical or demographic data for any purpose. Aggregated data may be derived from personal data but is not considered in law to be personal data as it does not directly or indirectly reveal your identity. For example, we may aggregate usage data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect aggregated data with any personal data so that we can directly or indirectly identify you, we must treat the combined data as personal data and use it only in accordance with this Privacy Notice.

Further details of the types of data we collect, for what purpose we use it and the legal basis for doing so is given in the table below, which uses the following abbreviations:

Type of Data

- 1 = **Identity Data** such as first name and last name.
- 2 = **Contact Data** such as the name and address of your firm or chambers, your email address and telephone numbers.
- 3 = **Financial Data** such as bank account details.
- 4 = **Transaction Data** such as details about payments for membership subscriptions or event bookings.
- 5 = **Technical Data** such as internet protocol (IP) address, login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices used to access our website.
- 6 = **Profile Data** such as your professional status, area of practice and, for interest only, your level of German.
- 7 = **Usage Data** such as information about how you navigate our website.
- 8 = **Marketing and Communications Data** such as your preferences about how you receive communications from us, whether you wish to receive marketing information from us and other communication preferences.

Legal justification for Processing

- A** = We need to process the data in order to process your application for membership and/or to provide you with the membership services and facilities we provide to our members.
- B** = We need to process the data in order to comply with a legal or regulatory obligation.

C = We process the data because it is necessary for our legitimate interests (or those of a third party) and we do not consider that your interests and fundamental rights override those interests.

Purpose/Activity	Type of data	Legal justification for processing (including basis of legitimate interest)
To register you as a new member	1, 2	A
<p>To process and comply with your instructions including:</p> <p>(a) manage payments, fees and charges;</p> <p>(b) collect and recover money owed to us</p>	1, 2, 4, 8	A , C (to recover debts due to us)
<p>To manage our relationship with you, which will include:</p> <ul style="list-style-type: none"> • confirming your identity; • updating and correcting our membership records; • sending you occasional newsletters; • sending you invitations to events which we think may be of interest to you; • notifying you about changes to our services; • notifying you about changes to our terms or privacy notice; • asking you to provide feedback or respond to a survey. 	1, 2, 6, 8	A, B, C (to keep our records updated and to study how members use our services)
To enable you to participate in a prize draw, competition or to complete a survey	1, 2, 6, 8	A, C (to study how members use our products/services, to

Purpose/Activity	Type of data	Legal justification for processing (including basis of legitimate interest)
		develop them and grow our association);
To administer and protect our association and our website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	1, 2, 5	B, C (for running our association, providing administration and IT services, network security, preventing fraud and in the context of a merger, reorganisation or restructuring exercise);
To deliver relevant website content and information to our members and contacts and measure or understand the effectiveness of the information we provide to them.	1, 2 5, 6, 7, 8	C (to study how members use our services, to develop them, to grow our association and to inform our marketing strategy)

“**Special categories of data**” includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health, and genetic and biometric data. We do not collect any special categories of data about you, nor do we collect any information about criminal convictions and offences.

Where we need to collect personal data by law, or to provide you with the services and other benefits of membership we have agreed to provide, and you fail to provide that data when requested, we may not be able to provide the services we have offered or agreed to provide. In this case, we may have to cancel your membership or decline your application for membership. We will notify you at the time if this is the case.

4. How is your personal data collected?

You may give us your Identity, Contact and Financial Data by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:

- apply for membership of the BGJA;
- request information to be sent to you;
- book a place at one of our events; or

- give us feedback or contact us.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during the period of your membership of the BGJA.

We do not collect personal data about you from third parties or public sources.

The BGJA website, <https://www.bgja.org.uk/>, 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 statements on every website you visit.

5. Automated technologies or interactions.

As you interact with our website, we will automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies and other similar technologies.

Our website uses cookies to distinguish between users of our website. This helps us to provide individual users with a good experience when they browse our website and also allows us to improve our site.

Cookies are small text files that are placed on your computer by websites that you visit. They are widely used in order to make websites work, or work more efficiently, as well as to provide information to the owners of the site.

These cookies are stored only in the browser and are not accessed by or shared with any other service or third party.

We use the following cookies:

- Strictly necessary cookies. These are required for the operation of our website. They include, for example, cookies that allow users to log into secure areas of our website or make use of e-billing services.
- Analytical/performance cookies. These allow us to recognise and count the number of visitors and to see how visitors move around our website. This helps us to improve the way our website works, for example by ensuring that users can easily find what they are looking for.

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. Whether our cookies are used will depend on your browser settings, so you are in control. If you disable or refuse cookies, please note that some parts of our website may become inaccessible or not function properly. To find out more about cookies, including how to

see what cookies have been set and how to manage and delete them, please refer to the cookies information in your browser.

6. Security and storage of your personal information

We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this Privacy Notice.

We will only retain your personal data for as long as reasonably necessary to fulfil the purposes for which we collected it, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. How long it will be stored for depends on the information in question, what it is being used for and, sometimes, statutory legal requirements. For example:

- We will usually delete personal information that we collect related to our events after **six** months. However, we may retain some information (such as attendance records) for longer where it is in our legitimate interests to do so.
- We will keep personal information held as part of our membership records for the duration of your membership. At the end of the membership, we will delete the majority of records and only retain the minimum information necessary to deal with any future issues and basic contact details in order to be able to carry out the functions listed in section 3 of this notice.
- In some circumstances we will anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes, in which case we may use this information indefinitely without further notice to you.

7. Your legal rights

You have the right to request:

- **Access** to your personal data (commonly known as a "**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.
- **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, though we may need to verify the accuracy of the new data you provide to us.
- **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), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable,

at the time of your request.

- **Cessation of processing** 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. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.
- **Restriction of processing** of your personal data. This enables you to ask us to suspend the processing of your personal data where:
 - you want us to establish the data's accuracy;
 - our use of the data is unlawful but you do not want us to erase it;
 - you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or
 - you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.
- **A transfer of your personal data** to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

If you wish to exercise any of the rights set out above, please contact us. You will not normally have to pay a fee. However, if your request is clearly unfounded, repetitive or excessive, we would be entitled to charge you a reasonable fee or, alternatively, to refuse to comply with your request.

We may need to request specific information from you to help us confirm your identity and ensure you are entitled to exercise the rights you are seeking to exercise. This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also need to contact you to ask you for further information in relation to your request to speed up our response.

We try to respond to all legitimate requests within one month. Occasionally it could take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.