# JRA PRIVACY POLICY

*This document is for users of <u>www.junkrigassociation.org</u> whether JRA members or not. <i>Items in blue are 'hot links' which go to the relevant web page.* 

# Introduction

In the UK (and other EU member states) national laws have been enacted to implement the requirements of the <u>EU Privacy Directives</u>. (NB. That link goes to the *Europa* site. <u>Wikipedia's</u> notes on the Directives show how complex these laws have become.) While the fine detail varies country by country, the EU (and US) laws require that site owners do several things.

1 - Inform users of the information they collect about them as a result of them browsing or using a web site.

- 2 Hold any collected visitor information securely.
- 3 Inform users what the collected information is used for.
- 4 Abide by their published policies.

5 - Not "over process" visitor information (to derive "unexpected" insights into the users). They may allow users to opt out of 'tracking' (i.e. following their movements around the site), but this is not required. Interestingly, the law does not talk about cookies, but covers any tracking and monitoring techniques. Most site managers appear to have construed it primarily to concern cookies and their use.

This document outlines how the JRA attempts to deal with these requirements. Note that <u>Wild Apricot</u> ('WA'), who host our site and whose software drives it, have their own Privacy Policy which can be read <u>here</u>. The two are of course independent, theirs concerning the JRA's use of their service.

Our Policy aims to be 'light touch' and 'transparent'. The authors believe that the EU legislation is aiming for these kinds of goals in what is a complex international environment. We are conscious that many JRA members are not located in the EU, but since the JRA is – and despite the fact that WA is based in Canada – we do need to follow the spirit of EU law both as it is now and if and as it changes.

### What information do we collect?

We collect information from you when you join the JRA, log in as a member, order goods, subscribe to our Magazine, respond to a survey, vote in an election, post in a forum, or fill out a form. When logging in as a member of the JRA, as appropriate, you may be asked to enter personal information such as your name, e-mail address, mailing address and/or phone number. You may, however, visit the public areas of our site anonymously, as of course may non-members. We do not collect personal information from non-member users, although we may monitor how they use the site in order to improve the experience of future guests and members who may from time to time choose to use the site as guests.

## How do we use the information we collect?

Any of the information we collect may be used in one or more of the following ways:

- To personalise your experience (your information may help us to better respond to your individual needs).
- To improve the website (we continually strive to improve JRA offerings based on the information and feedback we receive from you).
- To improve our service to you (your information helps us to more effectively respond to your needs).
- To process transactions such as membership fees and merchandise charges (information that you provide us with will not be sold, exchanged, transferred, or given to any other company for any reason whatsoever, without your consent, other than for the express purpose of delivering the goods or service requested or processing payments (e.g. <u>PayPal</u>).

- To administer a contest, promotion, survey, vote or other site feature
- To send periodic emails (the email address you provide for order processing and membership renewals or cancellations may be used to send you information and updates pertaining to our services, in addition to occasional JRA news updates etc.). We strive to include an Unsubscribe link at the bottom of each email sent through the WA system so that you may, if you wish, unsubscribe from receiving JRA emails.. Where emails are sent from JRA Committee members these may come from their personal or JRA email addresses and will not contain unsubscribe information. JRA Committee members undertake to preserve the integrity of your personal information as if it was held in the website's email or other WA systems.

#### How do we protect your information?

WA implement a variety of security measures to maintain the safety of your personal information when you enter, submit, or access your personal information. The JRA Treasurer has access to your information for membership and product purchase purposes. The Membership Secretary has access to your membership records. Other Committee members may volunteer to access information on an 'as needs' basis, e.g. when deputising for another Committee member or when taking backups e.g. of membership records.

For security reasons, passwords to WA, PayPal and <u>Box</u> are known to at least two Committee members. Passwords to other service providers that we may choose to use will be handled similarly.

Where members are given internal (e.g. development) access to the site this is only to selected pages and gives no access to members' personal information that is not available to everyone else.

#### How can you protect your information?

Do not give your site access details (password, email address) to anyone. Change your password frequently. Get to know how to control what information is displayed on publicly viewable pages and what is displayed on member-viewable pages. You can control this via your membership profile.

#### Do we use cookies?

Yes. Cookies are small files that a site or its service provider (in our case WA) transfers to your computer's permanent memory (if you allow it) via your web browser. Cookies enable WA's systems to recognise your browser and capture and remember certain information about your visiting history and preferences. It uses cookies to understand and save your preferences for future visits.

We have and may compile aggregate data about site traffic and site interaction so that we can offer better site experiences and tools in the future. To date we have mainly used <u>Google Analytics</u> for this. Our agreements with them, with *WA*, *Box* and <u>SurveyMonkey</u> allow them to assist us in better understanding site visitors and how they use the site by the inclusion of cookies which they provide. We do not include our own cookies. Those providers are not permitted to use the information collected on our behalf except to help us conduct and improve our activities. The same expectation will be placed on future providers.

Whether or not your web browser allows cookies is in your hands. Some browsers allow them by default, some require you to enable them. We suggest that you consult your browser's Help files or pages to find out how changes can be made. Wild Apricot use <u>WikiHow</u> to explain how to configure browsers to use cookies should these have been disabled on your machine.

If you choose to disable cookies you will not be able to log-in to the site, but will still be able to view our 'public' pages just as anyone else can. We have checked this on Google Chrome (one of the most popular web browsers) by 'disabling cookies' in 'all local storage', deleting all existing *WA* cookies, and setting 'DNT headers' (do-not-track headers). The site appears to work normally for the public pages, and *WA* refuses to let members log in, with a brief notice to that effect. This behaviour seems correct. We assume that such would be the case for other browsers.

#### Do we disclose any information to third parties?

We do not and will not sell, trade, or otherwise transfer to third parties your personally identifiable information except in the following cases:

• If you are subscribed to our printed magazine we will pass your personal address to our printer for

mail purposes only

- WA store your information on their servers and perhaps on backup providers' servers, but neither they nor any of their associates should access the content without our permission
- Data is automatically passed to PayPal if you use it to pay for goods or services you purchase from the JRA
- We may release or authorise the release of your information when we believe that it is appropriate to comply with applicable legislation, to enforce our site policies, or to protect ours or others' rights, property, or safety.

#### **Third-party links**

At our discretion we may include links to third-party sites on our website. Such third-party sites may have separate and independent Privacy Policies. We can accept no responsibility or liability for the content and activities of these linked sites. Nonetheless, we seek to protect the integrity of our site and your data and welcome any feedback about such links, which should be addressed to the webmaster via this link.

#### Your consent

By using our site, you consent to this Privacy Policy.

#### **Changes to this Privacy Policy**

If we decide to change our Privacy Policy we will incorporate those changes here, inform you about the update via a post in the <u>Committee News</u> section of the site, and/or update the Privacy Policy modification date below.

#### Contacting us

If there are any questions regarding this Privacy Policy, please contact us using the information below. Copies to each email address are recommended as Committee members are volunteers who do not undertake to access the site or process emails on a daily basis.

- <u>chairman@junkrigassociation.org</u>
- <u>honsec@junkrigassociation.org</u>
- webmaster@junkrigassociation.org

This policy was drafted by Lesley Verbrugge (co-opted Committee Member), checked and amended with many new recommendations by Malcolm Duckett, edited by Brian Kerslake. Draft 5 was approved by the JRA Committee on 19.11.2013.

Modified 18.12.2013 by webmaster to include:

- Typos and EU/Wikipedia information/links.
- Statement that password protection will apply to any future service providers that we use or which members use on our behalf.