



# THE SMBP 44 ASSOCIATION

## Privacy Notice for Members

### WHAT DOES THIS PRIVACY NOTICE COVER?

This privacy notice provides information about the personal data that The SMBP 44 Association ('44 Club') holds. Personal data is any information about you or which can be used to identify you. It explains **what** personal data is processed, for **which purposes**, **how long** we hold the personal data for, how to **access** and **update** your personal data and where to go for further **information**.

### WHO IS RESPONSIBLE FOR THE PERSONAL DATA COLLECTED?

The SMBP 44 Association is based at Shell Centre, York Road, London SE1 7NA which is an unincorporated association. Please note that although we receive support in the way of resources from the Shell group of companies ('Shell'), the 44 Club is entirely separate and independent from Shell.

### WHAT PERSONAL DATA DO WE PROCESS?

We only hold personal data of those individuals who:

- Have applied to us directly for membership.
- Have requested continuation of membership following the death of their spouse.

Personal data requested from you will be the minimum required to ensure you can participate in the 44 Club and/or associated networks, excursions and events. We process personal data necessary to manage your membership of the 44 Club including:

- Your name.
- Home address.
- Date of birth.
- Date of joining and leaving service with companies that formed the group prior to brand separation.
- Email address (if you choose to communicate with us via email).

### SENSITIVE PERSONAL DATA

We do not aim to collect any data about you which falls into a special category of personal data (also called 'sensitive personal data') such as data relating to your health, your racial or ethnic origin, religious or philosophical beliefs, political opinions or trade union membership.

### YOUR CONSENT

In all cases we only hold your personal data where we have your consent to do so. You have the right to withdraw your consent at any time at which point we will delete all of your personal data as soon as possible. Please see the contact details below to do this.

If you choose not to provide us with your personal data, then this will mean that we cannot stay in touch with you in order to provide you with information about members' benefits.

### **WHO WILL WE SHARE THE PERSONAL DATA WITH?**

Your personal data is only processed for the purposes referred to above and will only be shared on a strict need to know basis with authorised third-party service providers with whom we have in place organisational, contractual and legal measures to ensure that adequate levels of protection have been implemented in order to safeguard the personal data. We will provide confirmation that an individual is a member of the 44 Club if there is a legitimate reason to do so with the Shell Pensioners Programme (SPP which is operated by Shell International Limited) or the Shell Pensioners Benevolent Association (SPBA which is a registered charity and independent from Shell) in respect of their assistance to Shell pensioners. We may also share data with the BP Society in order to maintain an accurate record of members who are BP Pensioners.

### **SECURITY OF YOUR PERSONAL DATA**

We have implemented technology and policies with the objective of protecting your privacy from unauthorised access and improper use and will update these measures as new technology becomes available, as appropriate.

### **HOW LONG DO YOU HOLD THE PERSONAL DATA FOR?**

Your personal contact details and date of birth are held for as long as you continue to be a member and will be deleted as soon as reasonably possible after your membership ceases.

### **HOW CAN I ACCESS MY PERSONAL DATA?**

We aim to keep our information about you as accurate as possible. You can access your personal data, request correction or deletion of the personal data and request that the processing of your data is restricted at any time by contacting:

The SMBP 44 Association, Shell Centre, York Road, London SE1 7NA

Email: [44-club@shell.com](mailto:44-club@shell.com)

Telephone: +44 (0) 207 934 5132

If you are dissatisfied with the handling of your personal data by the SMBP 44 Association you have the right to lodge a complaint with the Information Commissioners' Office at Wycliff House, Water Lane, Wilmslow, Cheshire, SK9 5AF Telephone: 0303 123 1113

Website: <https://ico.org.uk/concerns/>

### **CHANGES TO THIS PRIVACY POLICY**

This Privacy Policy was last updated on 9<sup>th</sup> October 2018. It may be changed over time.