

Privacy Notice: National Association of Student Money Advisers (NASMA)

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02	Privacy Notice: National Association of Student Money Advisers (NASMA)	May 2018	June 2019	Gareth Pearse Stephen McCartney

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About this document

The information published here applies to the use of your personal information and explains how the National Association of Student Money Advisers, herein referred to as 'NASMA' uses and shares your personal data, and your rights in relation to the personal data we hold.

Changes to the law

Until 24 May 2018 we have processed your personal data in accordance with the Data Protection Act (DPA) 1998. From 25 May 2018, we will process your personal data in accordance with the General Data Protection Regulations (GDPR) and Data Protection Bill.

What is personal data?

'Personal data' is any information which relates to a living individual that enables them to be identified from that data.

Where does NASMA get your personal data from?

We obtain personal data about you from the following sources:

- From you when you provide your information to NASMA (for example, a membership application, NASMA event, general enquiry, or undertake a paid or voluntary role on behalf of NASMA);
- From third party sources. When personal data is obtained about you from third parties, we will ensure that they have lawful authority to provide us with your personal data.

Who do we share your information with?

In addition to your personal information being shared with relevant NASMA staff and Board members, NASMA will also share your personal data with third parties (for example NASMA Regional Chairs/External Trainers). This information will only be shared as permitted or required by our statutory or contractual obligations on a confidential and considered basis.

See Table 2.0 for further information on who we share your data with and our legal basis for doing so.

Transfer of data to other countries

Occasionally NASMA may be required to share your personal data with organisations either based in the European Union (EU) or countries outside the EU but that have equivalent levels of protection. These transfers of data are highly infrequent and would only occur in order to meet contractual responsibilities with you and once we were assured that appropriate safeguards were in place.

How long is my information kept?

We store your personal information as part of your membership record and to enable us to execute statutory, Company and Charity duties. Information on how different types of information and the periods for which NASMA retains information can be found in the 'Retention Schedule for National Association of Student Money Advisors'. <<Here>>

Who is responsible for my data?

Responsibility in relation to processing data rests within two roles, the Data Controller and Data Processor. The Data Controller is responsible for determining the purposes and means of processing personal data and the Data Processor is responsible for processing personal data on behalf of the Controller. For the purposes of this policy the Data Controllers are the NASMA Chair and Vice Chair Governance and Operations. The Data Processors are the NASMA Office Manager and any other individual instructed by the Data Controllers to process data.

NASMA has also identified the Vice Chair Communications as the Data Protection Officer (DPO).

How can I access my personal information?

You have the right to:

- access personal information that NASMA holds about you;
- ask NASMA to correct inaccurate personal information held about you;
- ask NASMA to delete personal information, or otherwise restrict or object to our processing of your data (unless required under statutory duties)

In order to make a request in relation to the above, please do so in writing to the address below, marked for the attention of the Data Protection Officer

Email: office@nasma.org.uk or

By Post: NASMA Office, West One, 114 Wellington Street, Leeds, LS1 1BA

For what purpose do we process your personal data and what is the legal basis for doing so?

We process your personal data for the administration of your membership or affiliation to NASMA.

The legal basis are as follows:

- (a) Consent:** there may be occasions where we will only process certain data for a specific purpose, subject to you having provided clear consent.
- (b) Contract:** it may be necessary to process your personal data to fulfil the contract we have with you or you have asked us to take specific action before entering into a contract with us.
- (c) Legal obligation:** the processing of your data is necessary to comply with the law (not including contractual obligations).
- (d) Vital interests:** the processing of your data is necessary to protect someone's safety/life.
- (e) Public task:** the processing of your data is necessary for us to perform a task that is in the public interest or for your official functions, and the task or function has a clear basis in law.
- (f) Legitimate interests:** the processing of your data is necessary for the legitimate interest of NASMA or a third party, unless there is a good reason to protect the individual's personal data which overrides those legitimate interests.

Categories of personal data being processed

- We will collect and process personal data about you for the purposes outlined in Table 1.0.
- Personal data may contain "sensitive personal data" as described under the Data Protection Act and "special categories of data" as described under the GDPR. Such "sensitive personal data" or "special categories of data" may include information pertaining to your protected characteristics and affiliations or, in relation to DPA only, other conditions and information concerning any criminal offences or criminal proceedings.
- When you register with us as a member or affiliate you can decide if you wish to share with NASMA certain types of "sensitive personal data" or "special categories of data". The online registration procedure will guide you through this process.

Lawful Basis for Processing (Article 6 of the GDPR) - the lawful bases for processing data are set out in Article 6 of the GDPR. In order to process your personal data we must be assured that we meet at least one of the bases and that it is considered necessary.

Table 1.0 Processing of Personal Data - what is the purpose?

Ref No.	Processing of Personal Data	Legal Basis (reference to Article 6 GDPR)
1.1	General administration of NASMA records, including the processing of applications for membership, accreditation, training and development, proposals for Honorary Life Membership, internal Governance obligations etc.	(b) Contract (f) Legitimate Interests
1.2	Administration of policies and procedures, for example, the procurement, payment, appeals, finance, complaints processes etc.	(b) Contract (f) Legitimate Interests
1.3	Compliance with organisational processing required for third party bodies e.g. Companies House, Charity Commission, HM Revenue and Customs etc.	(b) Legal Obligation (e) Public Task (f) Legitimate Interests
1.4	Administration of duties relating to the organisation and execution of events (third parties only)	(b) Contract (f) Legitimate Interests

Table 2.0

Sharing/ Provision of Data to Third Parties

Ref No.	Sharing/Provision of Data to Third Parties	Legal Basis (reference to Article 6 GDPR)
2.1	Organisations as required in order to comply with statutory obligations. For example, Companies House, Charity Commission, HM Revenue and Customs etc.	(c) Legal Obligations (f) Legitimate Interests
2.2	To Law Enforcement Agencies or other regulatory bodies in accordance with an investigation or disclosure of a potential crime	(c) Legal Obligation (e) Public Task (f) Legitimate Interests
2.3	The Home Office and other government and regulatory bodies in connection with the status of an employee or member when conducting business on behalf of NASMA or in their capacity as a member of the organisation	(b) Contract (c) Legal Obligation
2.4	Organisations as required in the administration and delivery of services to members	(b) Contract (f) Legitimate Interests
2.5	Data Processors contracted to process data on behalf of NASMA, in conjunction with this notice and any of the purposes for which the organisation is permitted to process the data	(b) Contract (f) Legitimate Interests
2.6	Reference requests for former and prospective NASMA staff/members	(f) Legitimate Interests

2.7	Next of kin and/or the emergency services where there is an emergency situation e.g. illness, serious injury or bereavement	(g) Legitimate Interests (d) Vital Interest
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Special Category Data (Article 9 of the GDPR) – this relates to data that is of a particularly sensitive nature and therefore needs more protection. Personal data that falls in this category requires a legal basis from both Article 6 and Article 9 of the GDPR. NASMA may need to process information relating to you that is designated as ‘Special Category Data’ and will obtain and process this information as an when required, as guided by the aforementioned articles.

Approval and Review

This Notice has been approved by the NASMA Vice Chair Communications (Data Protection Officer) and NASMA Chair. It will be reviewed no less than by-annually by the NASMA Board of Directors/Trustees in order to ensure it meets the requirements of members, affiliates and statutory compliance.