



British Association of Monaco  
BP 41,  
MC 98001 Monaco Cedex

+377 93 50 19 52

Facebook: @bammonaco Twitter:@bammonaco

## Privacy Policy

Last updated: **24<sup>th</sup> May 2018**. This replaces all other earlier privacy policies.

### Who We Are

This Privacy Policy relates to information about you (“personal data”) which is obtained by British Association of Monaco (“BAM”, “us”, “we”, or “our”) and for which BAM is the Data Controller.

BAM is a Cultural Association located in the Principality of Monaco.

BAM’s registered address is, 11 Avenue Saint-Michel, 98000 Monaco

BAM's mailing address is,  
British Association of Monaco  
BP 41,  
MC 98001 Monaco Cedex

### BAM’s Purpose

BAM's purpose

*“To provide a focus for British and Commonwealth citizens residing in Monaco and surrounding areas to meet socially, represent their views in the Principality and to provide a welfare service for those in need. “*

### What personal data might BAM collect about you?

We may collect the following types of personal data: your name, email address, postal address, telephone or mobile number, bank cheque details of your payments to us, details about payments to and from you including membership fees, donations and other details of products and services such as events that you have booked with us as well as event attendance.

### Special Categories of Personal Data (not CST)

We do collect "special categories of personal data" about you as a BAM member as follows,

We will record if you are a British or Commonwealth citizen, or not, as this determines your rights to vote at the BAM AGM, or not vote. You need not tell us your exact nationality but can specify “British/Commonwealth” or “Rest Of World”.

Clear notices will be provided on application forms for membership or events so that it is clear what information we need and why we need it.

## Special Categories of Personal Data - (CST)

BAM has two very separate activities which have very different data collection approaches:

The most common activity is administering the BAM membership but we also have a very separate BAM Community Support (CS). The CS was set up to offer practical, pastoral and financial help to the British and Commonwealth Community in Monaco and the neighbouring areas. We work with several British charities, the Monegasque social services, local hospitals and retirement homes. **You need not be a member of BAM to get support.**

The CS is financed by BAM Patrons and individual donations. BAM takes great care to use these funds effectively and discreetly. The confidentiality of each applicant for financial help is extremely important to BAM and is respected at every level. This personal data does not get mixed with the regular BAM Membership and events data.

All categories of membership related personal data are stored on a secure database, to which only the BAM administrator and a limited number of the committee have access. It is deleted when no longer relevant, is never shared with third parties, and is available to you at any point should you wish to see it.

All categories of CS related personal data are recorded manually, to which only the CST have access. It is deleted when no longer relevant, and never shared with third parties unless agreed by you, and is available to you at any point should you wish to see it. When CS cases (you) are referenced with the main BAM committee (for example to approve funding) then the data is presented through use of an anonymous case number.

## Why does BAM use your personal data?

We may process your personal data for a number of reasons, and BAM will only use your personal data where it has an appropriate legal basis, such as: (1) where the processing is in our own legitimate interest; (2) it is in compliance with a legal obligation; (3) it is necessary to perform a contract between us and you; and/or (4) you have consented to our use of your personal data.

1) Legitimate interest:

We may rely on our own legitimate interest to process your personal data for the following reasons:

To keep a record of membership fees paid and donations made and actions taken by our members and our communications with them.

To support volunteers at events.

Service administration, such as administering any donations you have made, to confirm receipt of donations (unless you have asked us not to do that), and to say thank you and provide details of how your donations might be used.

In relation to correspondence you have entered into with us whether by letter, email, text, social media, message board or any other means, and to contact you about any content you provide.

For internal record keeping, so as to keep a record of your relationship with us.

To use IP addresses to identify the location of users, to block disruptive use and to establish the number of visits from different countries.

For market research.

To analyse and improve the activities and content offered by BAM website to provide you with

the most user-friendly navigation experience. We may also use and disclose information in aggregate (so that no individuals are identified) for marketing and strategic development purposes.

For the dissemination of relevant information to journalists (for example Riviera Radio or other Monaco news providers).

## 2) Legal obligation:

We may also need to comply with legal requests where disclosure is required or permitted by law. For example, to government bodies for tax purposes or law enforcement agencies for the prevention and detection of crime, subject to such bodies providing us with a relevant request in writing.

## 3) Contract:

We may process your personal data where it is necessary for the performance of a contract with you, such as for completion of transactions you have entered into with BAM or the activity or online content you have signed up for.

Where we need to collect personal data by law, or under the terms of a contract we have with you, and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, where you make online purchases or donations). In this case, we may have to cancel a product or service you have with us but we will notify you if this is the case at the time.

## 4) Consent:

We will only process your personal data for the following reasons with your consent:

- To send you marketing information about our events, fundraising activities and appeals.
- To invite you to participate in surveys or research about BAM or our work.
- To send you marketing information about BAM friendly societies and other related clubs events, their fundraising activities and appeals
- To send you marketing information from the BAM Patrons, sponsors or partners' events, fundraising activities and appeals.

In all cases your personal data is only processed in-house by BAM and not given to anyone else for them to market to you directly

You may withdraw your consent at any time. Please see the “What are your rights?” section of this privacy policy below for instructions on how to withdraw consent.

## **Data processed outside of Monaco or the EU**

As your personal data is processed in Monaco by BAM then it is by default processed outside of the EU but your data is only processed outside of Monaco and the EU where BAM has verified that appropriate standards and safeguards are in place.

Only a very limited subset of your personal data is processed outside of Monaco, namely we only use email addresses and some names on web servers and on emails. BAM uses Web servers within the EU as well as Mailchimp as an email service provider that operates outside of the EU.

Mailchimp ensures that any transferred personal data remains protected and secure. You can find out more about how Mailchimp keeps data secure here, <https://mailchimp.com/legal/privacy> .

## **When and why we will send you personalised marketing communications**

BAM will only contact you for marketing purposes, for example to keep you up to date with our events and our work, or let you know of ways in which you can support that work, where we have your consent or we are otherwise allowed to do so.

We will make it easy for you to tell us if you would like to receive marketing communications from us and hear more about our work and the ways in which you would like to receive this information (post and email). You can withdraw your consent at any time, and we will not send you marketing material if you tell us that you do not wish to receive it.

## **How and when we collect personal data about you**

BAM may collect your personal data in the following circumstances:

When you give it to us **DIRECTLY**:

You may give us your personal data directly when you register as a member, make a donation, sign up for one of our events, purchase products from BAM, or when you communicate with us.

When you give it to us **INDIRECTLY**:

You may give us your personal data indirectly when you sign up at events such as community meetings, or via social events such as charity stalls. These independent third parties will pass your data to BAM where you have indicated that you wish to support BAM and have given your consent to BAM processing your personal data or it is a necessary part of completing a contract with you.

When you access BAM's Social Media:

We might also obtain your personal data through your use of social media such as Facebook, Twitter or LinkedIn among others, depending on your settings or the privacy policies of these social media and messaging services. To change your settings on these services, please refer to their privacy notices, which will tell you how to do this.

When we use cookies:

Cookies are a useful way for us to understand how visitors use our web site. When you visit our web site we will collect data from your computer or other device such as a smart phone or tablet through the use of "cookies". Cookies are created by your web browser when you visit our website. Every time you go back to the BAM website, your browser will send the cookie file back to the website's server. They improve your experience of using our website, for example, by remembering your preference settings so that you are presented with information likely to be most relevant to you, and by measuring your use of the website to enable us to continuously improve our website to ensure that it meets your needs. Cookies can also be used to show you relevant BAM content on social media services such as Facebook - these are known as 'retargeting' or 'advertising' cookies. For information on the types of cookies we use, how we use them and how you can control your cookie preferences, see BAM's cookie policy.

If you visit our website as an anonymous visitor (e.g. you switch off cookies), BAM may still collect certain information from your browser, such as the IP address (an IP address is a number that can uniquely identify a computer or other internet device).

The BAM website contains hyperlinks to websites owned and operated by other organisations. These third-party websites have their own privacy policies, including policies on their use of cookies, and we urge you to review them. They will govern the use of personal data you submit or

which is collected by cookies whilst visiting these websites. We cannot accept any responsibility or liability for the privacy practices of such third-party websites and your use of such websites is at your own risk.

## **Will BAM share your personal data with anyone else?**

We will only use your personal data within BAM for the purposes for which it was obtained. BAM will not, without your consent, share or sell your personal data with any third party for their own marketing purposes, and you will not receive marketing from any other companies, charities or other organisations as a result of giving your details to us.

## **BAM's Suppliers**

We may need to share your personal data with service providers who help us to deliver our events, fundraising activities and appeals. These "data processors" will only act under our instruction and are subject to pre-contract scrutiny and contractual obligations containing data protection clauses that protect your personal data. We do not allow these organisations to use your data for their own purposes or disclose it to other third parties without our consent and we will take all reasonable care to ensure that they keep your data secure.

## **Facebook and other Social Media Sites**

BAM has Facebook, Twitter and LinkedIn accounts but these are not connected in any way with our internal BAM data that we hold on you.

The social media sites may discover your personal data but it was not through BAM.

## **How long will BAM keep your personal data?**

We will hold your personal data on our systems for as long as is necessary for the purposes described above, and in accordance with applicable laws.

Where you contribute material to us, e.g. user generated content or in response to a particular event, we will only keep your content for as long as is reasonably required for the purpose(s) for which it was submitted unless otherwise stated at the point of generation.

## **What are your rights?**

Where BAM relies on your consent to process your personal data, you can withdraw this consent at any time. If you wish to withdraw your consent please contact us via our email or address provided below.

You are entitled, in accordance with applicable law, to object to or request restriction of processing of your personal data, and to request access to, rectification, erasure and portability of your own personal data. The accuracy of your information is really important to us. We want to ensure that we are able to communicate with you in ways that you are happy with, and to provide you with information that is of interest. If you are aware of changes or inaccuracies in your personal data you should inform us of such changes so that the personal data may be updated and corrected.

You will not have to pay a fee to access your personal data (or to exercise any of the other rights listed above). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive.

If you wish to change how we communicate with you, or update the information we hold, then please contact us:

amend your preferences by clicking the link of the bottom of any email we send to you via Mailchimp or email us at [bam@monaco.mc](mailto:bam@monaco.mc), or write to us at: British Association of Monaco, BP 41, MC 98001 Monaco Cedex

Additionally, you can opt out of email separately:

Email - You can opt out of marketing emails at any time by clicking the unsubscribe link in any of our mailchimp marketing email from BAM.

## **How long will it take for these changes to be effective?**

We endeavour to meet the following service levels where members opt-out of receiving marketing information:

Email – 2 business days from receipt of email

Mail - 28 calendar days from receipt of 'do not mail' request. This period is longer than for other channels due to the production times for mailing newsletters, and in most cases, we would expect the change to be effective much more quickly.

## **How BAM keeps your data safe**

We ensure that there are appropriate technical controls in place to protect your personal details. Where possible, our online forms use industry standard encryption and our network is protected and routinely monitored.

We undertake regular reviews of who has access to information that we hold to ensure that your personal data is only accessible by appropriately trained staff, volunteers and contractors.

We can use external companies to collect or process personal data on our behalf (namely Mailchimp). We do comprehensive checks on these companies before we work with them, and put a contract in place that sets out our expectations and requirements, especially regarding how they manage the personal data they collect on our behalf, or have access to. We have a robust partner monitoring framework to ensure these contractual obligations are met.

## **How to make complaints about this policy or raise privacy concerns**

If you would like more information, or have any questions about this policy, or to make a formal complaint about BAM's approach to data protection or raise privacy concerns directly please contact the Administrator by email at [bam@monaco.mc](mailto:bam@monaco.mc), or write to us at: British Association of Monaco, BP 41, MC 98001 Monaco Cedex

## **Changes to BAM's Privacy Policy**

Our previous version came out in 2009 and a lot has changed since then so we threw away the old and started from new. This new Privacy Policy though may be updated from time to time so you may wish to check it each time you submit personal data to BAM. The date of the most recent revisions will appear on this page. If you do not agree to these changes, you can raise your concerns with the BAM Committee by emailing BAM or you can change your preferences for the emails by updating the subscription information (found on footer of each email). If material changes are made to the Privacy Policy we will notify you by placing a prominent notice on the website.

This version was last updated on 24th May 2018.