

DCNW Ltd Privacy Policy
Version: 1.2
Date: 23rd September 2019

Who are we?

We are DCNW Ltd, A private not-for-profit company limited by guarantee, Company Registration Number 10480955 (England and Wales).

Our Registered Office Address is:

DCNW Ltd, South Building, Upper Farm, Wooton St Lawrence, Basingstoke, Hampshire, RG23 8PE

All referenced to data refer to your personal data.

All reference to “we” mean DCNW Ltd and any event operated by DCNW Ltd such as “Hibanacon”.

DCNW Ltd are committed to maintaining your privacy and this policy is intended to cover the following information:

1. Inform you about the GDPR
2. Provide you a clear understanding of the following topics:
 - What personal data we collect
 - How it is collected
 - Why we collect it
 - What it is used for
 - Where it is stored
 - How long data is retained for

Your privacy is important to us and we believe the GDPR regulations are fundamental in protecting your privacy and will always comply with all GDPR regulations. We respect your right to be informed about usage and collection of you personal data and provide this policy both to aid in your understanding, addressing the topics specified above and as part of meeting our legal obligations under GDPR regulations.

What is GDPR?

General Data Protection Regulation, GDPR, are EU regulations to which all members of the EU are subject. In effect it is a set of rules which organisations must follow if they process personal data in any way for any purpose. It is similar to the data protection act which it replaces but places more emphasis on disclosing to a data subject the purposes for which their data will be used as well as providing much more control over how their data is used and allowing, for example, consent to be revoked. Anyone processing personal data must tell you what information they will process, the legal basis they have for requesting the data and what they will use it for. Data, once obtained, can only be used for the purpose for which it was originally obtained and cannot be used for any unrelated purposes. For more information about GDPR, then please see the EUs own information site at <https://www.eugdpr.org/eugdpr.org.html>

Where is my data stored?

As is true for most websites, we utilise some 3rd party services to manage and store your data. This means that your data may be transferred, processed and stored outside the EEA in some circumstance. All of our systems have been selected to ensure that they comply with EU directives for privacy, privacy shield and are therefore compatible with our privacy obligations and commitment to you.

We utilise the following 3rd party systems to store and manage your data:

Agile CRM – Stores and managed your registration and ticket details along with some website analytical data. This is hosted using google cloud services, google cloud conforms with EU data protection laws including ensuring that all data is encrypted, please see <https://cloud.google.com/security/compliance/eu-data-protection/> for further information.

MailChimp – An industry standard email distribution list management solution use to send you updates regarding our events and, if you have opted in, marketing emails. MailChimp conform to privacy shield regulations and is GDPR compliant. You can find details of their privacy policy here <https://mailchimp.com/legal/privacy/>

Stripe – Stores financial transaction records and provides payment processing facilities for our website. You can find details of the privacy shield policy here <https://stripe.com/privacy-shield-policy>

ownCloud – A private cloud service hosted by our ISP on encrypted UK based servers used as outlined in the “What information do you keep” section.

Google Analytics – A standard platform that records aggregated website usage data. The data collected is anonymised.

What information do you keep?

The following table outlines the pieces of data we collect, where we collect, what it is used for, where it is stored and for how long.

Type of information	Purpose	Lawful basis	Collection method	Processed and stored by	Retention period
First name Last name Date of birth Physical address Post Code Email address Phone number	We use this information for the following purposes: <ul style="list-style-type: none"> • Sending tickets to the event • Verify your eligibility for entry • Verify your ID • Age verification • To keep you informed of material changes 	Contract fulfilment	Registration form submission from website	Agile CRM (USA), Encrypted. Covered by privacy shield legislation.	Deleted once the event date has passed if no repeat registration seen within 12 months

	to the event				
Pseudo anonymised* 1 st part of post code Count of attendees with that postcode	To allow us to make improvements to our events.	Legitimate interest	Registration form submission from website	ownCloud server	Indefinite
Payment records (excluding the full card number): <ul style="list-style-type: none"> • Card type • Cardholder name • Expiration date • Valid from date • last 4-digits of card number • Source of transaction (webpage URL) • Transaction time • Amount paid • IP Address • Browser • Unique ID (auto generated) • Transaction status (success, rejected) • Email address • Ticket ID (auto generated) • Transaction 	<ul style="list-style-type: none"> • Invoicing • Generate invoices when you successfully pay for requested services • Investigate and resolve any payment issues e.g. refunds, rejected cards • Accounting 	Contract fulfilment	Payment submission from website	Stripe, Encrypted	<p>Financial data is legally required to be kept for 6 years.</p> <p>Transaction data is kept for 6 years from the end of financial year in which the transaction occurred.</p>

risk score (auto generated)					
Name and email address	Sending direct email communications about DCNW Ltds future events.	Consent	<ul style="list-style-type: none"> Registration form submission (opt-in check box) Register interest form submission 	MailChimp (USA), Encrypted. Covered by privacy shield regulation.	Until you unsubscribe/opt out.
Emergency contact phone number Emergency contact name	Used only in the event of an emergency situation to inform the specified person of an emergency affecting an attendee e.g. should an attendee become ill during hibanacon.	Legitimate interest	Registration form submission	Agile CRM (USA), Encrypted. Covered by privacy shield legislation.	Deleted once the event you are registered for has finished.
First name Last name Badge name Schedule name E-Mail address Phone number Panel name & description Co-host names	Use to administer your request to run panels or participate in an activity at a DCNW event.	Legitimate interest	Panel submission form via email.	OwnCloud server. Trello (Names only)	Delete once the event you are registered for has finished.
Email address First Name Last Name Feedback question answers Date accessed	Used exclusively to improve future events.	Legitimate Interest	Upon Registration: email First and Last Names Upon access: Feedback answers Date Accessed	Lime Survey	Indefinite

Badge name First name Last name Item details Sales record (anonymous)	To manage bring and buy sales	Contract fulfilment	Upon submission of items list to bring and buy.	OpenPOS	Financial data must legally be kept for 6 years.
Site visitor statistics	Used to improve our website performance and functionality.	Consent	Collected on page visits when cookies are allowed and opted into.	Google Analytics	Indefinite (anonymized data)
Email address	Used to contact you if you are on the waiting list	Legitimate interest	Collected when registering for the waiting list	Website database	Deleted once the event you have registered interest for is over.
Badge Name (Optional) First Name (Optional) Last Name (Optional) Unique ID Reg Status	Used to managed the attendee list	Legitimate interest	Registration form submission from website	Website database	Deleted once the event you have registered interest for is over.

* Pseudoanonymised in this instance means it may be possible under some circumstances, were the data to be combined with other data we hold, to re-identify an individual. We **do not perform such re-identification activities** as we do not believe this is consistent with our commitment to your privacy. An example of re-identification would be if a person were to have attended and paid for ticket with their credit card and were the only person within a postal code area to do so, combining the first part of the post code with the payment record would allow for re-identification.

Who has access to my data?

Personal data is only accessible to DCNW directors and a restricted subset of the Hibanacon committee that deal with registrations. All persons with access must abide by and follow our data protection policy.

Use of 'cookies'

hibanacon.co.uk uses cookies to deliver functionality on our website. 'Cookies' are small pieces of information sent by an organisation to your computer and stored on your hard drive to allow that website to recognise you when you visit. They collect statistical data about your browsing actions and patterns. For more information see our cookie policy at: <https://www.hibanacon.co.uk/cookies.pdf>

Links to other websites

This privacy policy applies only to the hibanacon.co.uk website, so we encourage you to read the privacy statements on the other websites you visit. We are not responsible for the privacy policies and practices of other sites even if you access them using links from our website.

Your rights

You have the following rights under the GDPR:

- to access your personal data
- to be provided with information about how your personal data is processed
- to have your personal data corrected
- to have your personal data erased in certain circumstances
- to object to or restrict how your personal data is processed
- to have your personal data transferred to yourself or to another business in certain circumstances.

Withdrawing your consent

You may withdraw your consent to marketing emails at any time using the unsubscribe link in any marketing email you receive. You may still receive direct communications from us about an event that you are a registered attendee for and is unaffected by your opt out of future marketing communications since these are essential to allow us to fulfil our contract with you. You may also revoke your consent by contacting us at <address>

Will you share/sell my data?

We use some 3rd party services to fulfil your requests and manage your data as outlined in the section “where is my data stored” therefore we do share some information to allow us to provide you with the services you have requested. We will only use the data you give us for the purposes of delivering the services you have requested directly relating to our events or 3rd parties we believe may be of interest but are not affiliated with us. We will not share or sell your data to any additional 3rd parties that are not listed already and are not use in conjunction with delivering services to you.

Can I obtain a copy of the data you hold?

You can request a copy of the details we hold about you in line with the data protection act 1998.

Please complete a subject data access request form, please download this from <https://www.hibanacon.co.uk/files/policy/sardoc> and send it to datacontroller@dcnw.co.uk

Alternatively, please write to: Data Controller, DCNW Ltd, 1 Millennium House, Priestly Way, Basingstoke

I think some of the data you hold may be incorrect, what should I do?

If you are a registered attended, in the first instance, please contact info@hibanacon.co.uk to update your details should they be incorrect.

Alternatively, Please contact datacontroller@dcnw.co.uk and issue any updates or corrections you believe need to be made and we will make the corrections as necessary for any data we hold about you.

Alternatively, please write to: Data Controller, DCNW Ltd, 1 Millennium House, Priestly Way, Basingstoke

Making a complaint

You have the right to take any complaints about how we process your personal data to the Information Commissioner Office (ICO):

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

You can write to ICO at: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF Telephone: 0303 123 1113.

Further details on the GDPR can be found at the Information Commissioner's Office website: www.ico.gov.uk

Review of this Policy

We keep this Policy under regular review. For more details, please address any questions, comments and requests regarding our data processing practices to: datacontroller@dcnw.co.uk