

## Al-Kindi Data Protection Policy

Al-Kindi (Al-Kindi Society of Engineers) (Company Limited by Guarantee)

Company No: 09081988

Effective Date: 1<sup>st</sup> of April 2026

Address: 21 Montana Gardens, Sutton, Surrey, England SM1 4FP

Email address: [info@alkindisociety.org](mailto:info@alkindisociety.org)

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### 1. Introduction

The terms (Al-Kindi, Al-Kindi Society of Engineers, the Society) all refer to the Company which obtains and uses personal data relating to members, volunteers, directors, event attendees, donors, supporters and other stakeholders.

This Policy combines the Society's general Privacy Policy with specific obligations applicable to volunteers who collect or process personal data on behalf of the Society. It is structured in line with recognised professional body standards and complies with the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018.

Al-Kindi Society of Engineers is the Data Controller. Volunteers act under the authority of the Data Controller when processing personal data on behalf of the Society.

### 2. Scope

This Policy applies to all volunteers (members and non-members), directors, officers and any individuals who access or process personal data for or on behalf of the Society.

Failure to comply with this Policy may result in withdrawal of access to systems, removal from volunteering responsibilities, or further action where appropriate.

### 3. Data Protection Principles

- Personal data shall be processed lawfully, fairly and transparently.
- Data shall be collected for specified, explicit and legitimate purposes.
- Processing should be adequate, relevant and limited to what is necessary.
- Data shall be accurate and kept up to date.
- Data shall be retained only for as long as necessary.
- Appropriate technical and organisational security measures shall be applied.

### 4. Categories of Personal Data

Society may process the following categories of personal data:

- Identity data (name, title).
- Contact data (email address, telephone number, postal address where provided).

- Membership and volunteer records.
- Event registration and attendance information.
- Donation and payment information.
- Technical data including IP address, browser type and website usage analytics.
- Communications and correspondence records.

#### **5. Lawful Bases for Processing**

- Contract – to administer membership, events, services and volunteering roles.
- Legal obligation – to comply with tax, financial and regulatory requirements.
- Legitimate interests – to manage, improve and promote the Society’s activities.
- Consent – for marketing communications and non-essential cookies.

#### **6. Website, Cookies and Analytics**

When individuals visit the Society’s website, technical and usage data may be collected including pages visited, time spent on pages, browser information and general location data. Essential cookies are used for website functionality. Non-essential cookies (including analytics tools) are used only with prior consent. Individuals may withdraw consent at any time.

#### **7. Events and Communications**

Personal data collected for events is used solely for event administration and may be shared with trusted service providers or event partners where necessary.

Marketing emails are sent only where consent has been obtained or were permitted under UK law (PECR). Recipients may unsubscribe at any time.

#### **8. Volunteer Responsibilities**

- Access and process personal data only to the extent necessary for their role.
- Use only Society approved systems and procedures.
- Maintain confidentiality and not disclose personal data without authorization.
- Ensure data is handled securely and transmitted safely.
- Assist the Society in complying with data subject rights.
- Immediately report any actual or suspected personal data breach.

#### **9. Data Sharing**

Personal data will only be shared internally where consistent with the purpose for which it was collected. External sharing is prohibited unless authorized by the Society or required by law.

#### **10. Personal Data Breach Procedure**

Any volunteer who becomes aware of loss, unauthorized disclosure, corruption or misuse of personal data must notify the Society immediately at [info@alkindsociety.org](mailto:info@alkindsociety.org).

The Society will assess whether notification to affected individuals or the Information Commissioner's Office (ICO) is required.

### **11. Data Retention**

Al-Kindi keeps personal data only as long as needed to serve its intended purposes, which include complying with legal, accounting, and regulatory requirements.

Retention periods are determined based on:

- The purpose for which the data was collected.
- The nature and sensitivity of the data.
- Legal or regulatory requirements.
- The Society's legitimate operational needs.

Unless a longer period is required by law:

Membership and volunteer records are retained during active involvement and for up to six (6) years thereafter.

Financial and accounting records are retained for six (6) years in accordance with statutory requirements.

Marketing data is retained until consent is withdrawn or the individual unsubscribes.

Website technical logs and analytics data are retained on a limited rolling basis.

At the end of the applicable retention period, personal data will be securely deleted, anonymised or retained only where lawful and necessary.

### **12. Data Subject Rights**

Individuals have the right to request access to their personal data held by the Society. This is known as a Subject Access Request (SAR) under Article 15 of the UK General Data Protection Regulation (UK GDPR).

Individuals have the right to lodge a complaint with the Information Commissioner's Office (ICO) at [www.ico.org.uk](http://www.ico.org.uk).

Al-Kindi will respond to valid data subject requests within one month in accordance with UK GDPR requirements. Any data subject request to be sent to the following:

21 Montana Gardens, Sutton, Surrey, England SM1 4FP

Email address: [info@alkindsociety.org](mailto:info@alkindsociety.org)

### **13. International Transfers**

Where personal data is transferred outside the UK, the Society ensures appropriate safeguards are in place including adequacy regulations or the UK International Data Transfer Agreement (IDTA).

### **14. Training and Compliance**

Volunteers may be required to complete data protection training and confirm adherence to this Policy before accessing personal data.

### **15. Third Party Platforms**

Third party accounts who may have Al-Kindi name mentioned on platforms such as Facebook, WhatsApp and LinkedIn for communication and outreach. These platforms are operated by third parties and are subject to their own privacy policies. Where a group is independently created and not authorised, administered, or formally adopted by Al-Kindi does not determine the purposes or means of processing and is therefore non a data controller in respect of that group.

Members or volunteers may create informal WhatsApp, Facebook, or LinkedIn groups. Unless expressly authorised and administered by the Society, such groups operate independently and are not official Society communication channels. The Society is not responsible for personal data shared within independently created groups.

Any statements, opinions or content published by individuals on external platforms, including any defamatory or inappropriate material, are the responsibility of the individual author. The Society does not accept liability for content posted on platforms that it does not officially administer.

Where the Society administers an official group, content must comply with the Society's Code of Conduct. The Society reserves the right to remove inappropriate content from official channels were reasonably practicable.

### **16. ICO Registration and Data Protection Fee**

Al-Kindi will ensure it is registered with the Information Commissioner's Office (ICO) where required by law and that the appropriate data protection fee is paid.

### **17. Governance Responsibilities**

The Board of Directors has overall responsibility for ensuring compliance with data protection policies.

### **18. Children's Personal Data**

The Al-Kindi Society of Engineers does not direct its activities at children and does not knowingly process personal data relating to individuals under the age of 18. Where children's personal data is processed, this will be done in accordance with the ICO Children's Code, with the best interests of the child as a primary consideration, appropriate consent where required, and a high level of privacy and security by default.

### **19. Changes to this Policy**

This Policy may be updated from time to time. The latest version will be made available to volunteers and published on the Society's website.