

WESTBOURNE CONSERVATIVE CLUB LTD

PRIVACY NOTICE AND DATA PROTECTION STATEMENT

Westbourne Conservative Club Ltd
6 Alum Chine Road
Westbourne
Bournemouth
BH4 8DX

Effective date: 22nd September 2026 | Last reviewed: 22nd September 2026

1. Introduction

Westbourne Conservative Club Ltd ("the Club", "we", "us" or "our") is a private members' club affiliated to the Association of Conservative Clubs Ltd.

The Club is committed to protecting the privacy, confidentiality and security of personal information relating to its members, prospective members, guests, employees, workers, volunteers, contractors, suppliers and other individuals with whom the Club has dealings.

This Privacy Notice explains what personal information we collect, why we collect it, how we use it, who we may share it with, how long we retain it and the rights individuals have in relation to their personal information.

The Club processes personal data in accordance with applicable data protection legislation in England and the United Kingdom, including the UK General Data Protection Regulation ("UK GDPR"), the Data Protection Act 2018 and other applicable data protection and privacy legislation.

The Club is registered and governed as applicable under the Co-operative and Community Benefit Societies Act 2014.

2. Data Controller

For the purposes of data protection legislation, Westbourne Conservative Club Ltd is the data controller in respect of personal information for which it determines the purposes and means of processing.

Questions concerning this Privacy Notice or the Club's handling of personal information should be directed to the Club Secretary.

The Secretary / Data Protection Contact

Westbourne Conservative Club Ltd
6 Alum Chine Road
Westbourne
Bournemouth
BH4 8DX
Email: admin@westbourneclub.com
Telephone: 01202 766698

3. Personal Information We May Collect

Depending upon an individual's relationship with the Club, we may collect and process information including:

- name, title and date of birth;
- home address and contact details;
- telephone number and email address;
- membership number, category, application, renewal and membership history;
- information supplied in connection with an application for membership;
- information concerning proposers and seconders where applicable;
- subscription and payment information;
- records of payments, purchases or other financial transactions where appropriate;
- correspondence and communications with the Club;
- records concerning attendance at Club meetings, functions or events where appropriate;
- guest and visitor information;
- photographs or video recordings where appropriate;
- CCTV images;
- information concerning complaints, incidents, accidents, disciplinary matters or alleged breaches of Club rules;
- records relating to the withdrawal or restriction of Club facilities;
- information concerning employees, workers, applicants, contractors and volunteers;

- emergency contact details where appropriate;
- information required for licensing, regulatory, legal, insurance, accounting, employment or health and safety purposes; and
- other information reasonably necessary for the proper administration, management, security and operation of the Club.

4. Special Category and Sensitive Information

In limited circumstances the Club may need to process information regarded as special category personal data under data protection legislation.

This may include, where relevant and necessary, information relating to health or disability, or other special category information which an individual voluntarily provides or which the Club is lawfully required to process.

Where special category personal data is processed, the Club will ensure that an appropriate lawful basis and additional condition for processing applies.

Information relating to criminal allegations, offences or convictions will only be processed where permitted by law and where appropriate safeguards are in place.

5. Why We Process Personal Information

We may process personal information for purposes including:

- administering applications for membership;
- maintaining the Club's membership records;
- administering membership subscriptions and renewals;
- communicating with members;
- managing the Club and its facilities;
- organising Club meetings, elections and other governance matters;
- administering events, entertainment and activities;
- managing guests and visitors;
- processing payments and maintaining financial records;
- operating and securing the Club's premises;
- operating CCTV and other proportionate security measures;
- protecting members, guests, staff, property and Club assets;
- investigating accidents, incidents, complaints and alleged breaches of Club rules;
- dealing with disciplinary and membership matters;
- protecting employees and members from harassment, intimidation, abuse or other inappropriate conduct;
- managing employees, workers, volunteers and contractors;
- complying with employment, licensing, taxation, accounting, health and safety and other legal obligations;
- dealing with insurers, professional advisers and regulatory authorities;
- preventing and detecting crime, fraud or misuse of Club facilities;
- establishing, exercising or defending legal claims; and
- otherwise administering and operating the Club lawfully and effectively.

6. Our Lawful Bases for Processing

The lawful basis used will depend upon the particular information and purpose for which it is being processed.

The Club may rely upon:

Contract - where processing is necessary to enter into or perform a contract, including the membership relationship where applicable.

Legal obligation - where processing is necessary for the Club to comply with a legal or regulatory obligation.

Legitimate interests - where processing is necessary for the legitimate interests of the Club or another person and those interests are not overridden by the individual's rights and interests.

Legitimate interests may include the proper administration and governance of the Club, protecting its premises and assets, maintaining security, investigating complaints and incidents, enforcing Club rules, protecting staff and members, maintaining appropriate records and defending the Club's legal rights.

Consent - where an individual has freely given consent to a particular use of their personal information and consent is the appropriate lawful basis.

Vital interests - in exceptional circumstances where processing is necessary to protect someone's life.

Where special category information is processed, the Club will also identify an appropriate condition permitting that processing under applicable data protection legislation.

7. Membership Records

The Club needs to maintain appropriate records concerning its members in order to administer membership and operate as a private members' club.

Membership records may include applications, membership details, subscriptions, correspondence and relevant records concerning an individual's membership.

Where reasonably necessary, membership records may also include complaints, warnings, restrictions, disciplinary proceedings and decisions relating to membership or use of Club facilities.

Access to such information will be restricted to persons who reasonably require it for legitimate Club purposes.

8. Complaints and Disciplinary Matters

Information supplied during a complaint, investigation or disciplinary matter will be handled confidentially and will only be disclosed where there is a lawful and legitimate reason to do so.

The Club cannot guarantee absolute confidentiality where disclosure is reasonably necessary to investigate a matter fairly, protect an individual, comply with the Club's rules, comply with the law, obtain professional advice or establish, exercise or defend legal rights.

Personal information concerning employees, members, complainants, witnesses or other individuals will not ordinarily be disclosed to another person merely because that person requests it.

The Club will consider data protection obligations, confidentiality and fairness when deciding what information can properly be disclosed.

9. CCTV

The Club operates CCTV for the purposes of maintaining the security and safety of the Club's premises, members, guests, employees, visitors and property; preventing and detecting crime; investigating accidents, incidents, complaints or alleged breaches of Club rules; and, where appropriate, establishing, exercising or defending legal claims.

Appropriate notices will be displayed to inform individuals that CCTV is in operation.

CCTV recordings will only be accessed or viewed by persons authorised by the Club or by appropriately authorised third parties where there is a legitimate and lawful reason for doing so.

The Club's CCTV system operates on a continuous recording cycle. Recorded footage is retained within the CCTV system for a limited period and is automatically overwritten by newer recordings as part of the normal operation of the system. The period for which particular footage remains available may vary according to the capacity, configuration and operation of the system.

The Club's current CCTV system may have technical limitations affecting the ability to download, copy, export or otherwise preserve recorded footage onto another device or storage medium. The Club cannot therefore guarantee that CCTV footage can be extracted or retained beyond the period for which it remains available within the CCTV system.

Where an accident, incident, complaint, suspected criminal activity, disciplinary matter, insurance matter, legal claim or other matter arises, the Club will take reasonable steps, where technically possible, to identify and preserve relevant CCTV footage. Where footage cannot technically be downloaded, copied, exported or preserved, the Club may arrange for it to be viewed by appropriately authorised persons while it remains available on the system and may make an appropriate written record of what was observed, where lawful and necessary.

Requests for access to CCTV footage will be considered in accordance with applicable data protection legislation. The Club's ability to provide a copy of footage may be affected by the technical capabilities of the CCTV system, whether the footage remains available at the time the request is received, and the rights and personal data of other individuals appearing in the footage.

Where the Club is able to lawfully provide or preserve CCTV footage, access and disclosure will be appropriately controlled. Footage may, where lawful and technically possible, be made available to the police, other law enforcement agencies, insurers, legal advisers, regulatory authorities or other persons where disclosure is required or permitted by law.

10. Employees, Workers and Applicants

The Club processes personal information relating to employees, prospective employees, temporary workers and other individuals working for the Club.

This may include recruitment information, contact details, employment records, payroll information, attendance, performance, training, disciplinary and grievance records, holiday and sickness information and information necessary to meet employment, tax, pension, health and safety and other legal obligations.

More detailed privacy information may be provided separately to employees and job applicants where appropriate.

11. Sharing Personal Information

The Club does not sell personal information.

Where necessary and lawful, information may be shared with organisations or individuals including:

- professional advisers;
- accountants and auditors;
- insurers and insurance advisers;
- banks and payment providers;
- payroll, pension and employment service providers;
- IT, software, communications and data storage providers;
- security providers;
- legal advisers;
- licensing or regulatory authorities;
- HM Revenue & Customs;
- local authorities;
- police or other law enforcement agencies;
- courts and tribunals;
- emergency services; and
- other organisations where disclosure is required or permitted by law.

Information will only be shared where there is an appropriate reason and, where necessary, suitable contractual or confidentiality safeguards will be used.

Affiliation with another organisation does not in itself mean that organisation is entitled to receive members' personal information.

12. Association of Conservative Clubs Ltd

The Club is affiliated to the Association of Conservative Clubs Ltd.

Personal information will not be shared with the Association merely because of that affiliation. Where information is shared, the Club will ensure that there is an appropriate purpose and lawful basis for doing so.

13. International Transfers

The Club will seek to keep personal information within the United Kingdom wherever reasonably practicable.

Some service providers may process or store information outside the United Kingdom. Where personal information is transferred internationally, the Club will ensure that the transfer is permitted under applicable data protection legislation and that appropriate safeguards are used where required.

14. Keeping Personal Information Secure

The Club will take appropriate technical and organisational measures to protect personal information against unauthorised or unlawful access, use, disclosure, alteration, loss or destruction.

Measures may include physical security, access restrictions, passwords, appropriate computer security, secure storage, confidentiality requirements, staff guidance and limiting access to those who reasonably require the information.

Committee members, officers, employees and others given access to confidential personal information are expected to respect its confidentiality and use it only for legitimate Club purposes.

15. How Long We Keep Information

The Club will not retain personal information for longer than is reasonably necessary for the purposes for which it was collected, including satisfying legal, accounting, regulatory, insurance and reporting requirements and establishing or defending legal claims.

Different categories of information may therefore have different retention periods.

When information is no longer required, it will be securely deleted, destroyed or anonymised where appropriate.

The Club should maintain a separate retention schedule setting out appropriate retention periods for its principal categories of records.

16. Individual Data Protection Rights

Depending upon the circumstances and the lawful basis being relied upon, individuals may have rights including:

- the right to be informed about how their personal information is used;
- the right to request access to their personal information;
- the right to have inaccurate information corrected;
- the right, in certain circumstances, to request deletion of personal information;
- the right, in certain circumstances, to restrict processing;
- the right, in certain circumstances, to object to processing;
- the right to data portability where applicable;
- rights relating to certain automated decision-making; and
- the right to withdraw consent where processing is based upon consent.

These rights are not absolute and exemptions or restrictions may apply.

A request concerning personal information should be made to the Club using the contact details contained in this Privacy Notice.

The Club may need to verify an individual's identity before responding to a request.

17. Right to Object

Individuals have the right to object to certain processing of their personal information where the Club relies upon legitimate interests.

Where an objection is received, the Club will consider it in accordance with applicable data protection legislation.

Individuals also have the right to object to the use of their personal information for direct marketing purposes.

18. Consent

Where the Club relies upon consent, an individual may withdraw that consent at any time.

Withdrawal of consent does not affect the lawfulness of processing which took place before consent was withdrawn.

19. Direct Marketing and Club Communications

The Club may communicate with members about membership administration, Club business and other matters connected with their membership where there is an appropriate lawful basis.

Where electronic direct marketing requires consent under applicable law, the Club will obtain the necessary consent and provide an appropriate means of opting out.

20. Information Obtained From Other People

Most personal information will be obtained directly from the individual concerned.

The Club may occasionally receive information from other sources, including members, guests, employees, witnesses, contractors, professional advisers, regulatory authorities, law enforcement agencies or publicly available sources.

Where required by law, the Club will inform individuals about information obtained from another source and its source or category of source.

21. Providing Information to the Club

Certain information is necessary for membership, employment or another contractual relationship with the Club, or because the Club is legally required to obtain it.

Where required information is not provided, the Club may be unable to process an application, administer membership, employ an individual, provide a particular service or comply with its legal obligations.

22. Automated Decision-Making

The Club does not ordinarily make decisions producing legal or similarly significant effects upon individuals solely by automated processing.

Should this change, affected individuals will be provided with the information required by applicable data protection legislation.

23. Personal Data Breaches

Suspected loss, unauthorised disclosure, theft or misuse of personal information should be reported immediately to the Club's Secretary or designated data protection contact.

The Club will investigate suspected personal data breaches and, where legally required, notify the Information Commissioner's Office and/or affected individuals.

24. Confidentiality

Committee members, officers, employees, volunteers and others acting on behalf of the Club must take reasonable steps to maintain the confidentiality and security of personal information to which they have access.

Personal information obtained through a person's position within the Club must not be used or disclosed for an unauthorised purpose.

Unauthorised disclosure of personal information may result in appropriate action under the Club's rules, employment procedures or other applicable arrangements and, in serious cases, may also have legal consequences.

Nothing in this Privacy Notice is intended to prevent a person from making a protected disclosure or exercising any legal right to report a matter to an appropriate authority.

25. Data Protection Requests

Requests concerning personal information, including requests for access, correction, deletion, restriction or objection, should be sent to:

The Secretary / Data Protection Contact

Westbourne Conservative Club Ltd
6 Alum Chine Road
Westbourne
Bournemouth
BH4 8DX
Email: admin@westbourneclub.com

Requests will be dealt with in accordance with applicable data protection legislation.

26. Complaints

Anyone who has concerns about the Club's handling of their personal information should initially contact the Club using the details above so that the matter can be investigated.

Individuals also have the right to make a complaint to the Information Commissioner's Office (ICO). The current contact details and information about making a complaint are available from the Information Commissioner's Office.

27. Changes to this Privacy Notice

The Club will review this Privacy Notice periodically and whenever there is a significant change in the way personal information is processed or in applicable data protection legislation.

An updated version will be made available to members and other affected individuals as appropriate.

Current version September 2026