

Updating your client privacy policies.

The driving force behind the GDPR is to ensure businesses are transparent with individuals regarding how personal data is used. Much of the regulation focuses on what and how disclosures are presented to data

subjects, including an emphasis on clarity of language. It is important to ensure your business has the proper disclosure documentation in place to provide transparency to your members and customers.

A good place to start is your Privacy Policy. This is a go-to document defining everything your business does with an individual's data. We strongly recommend you work with a legal expert versed in GDPR compliance to make sure you provide the correct information in the right way.

We have provided a breakdown of some of the information you should give users to get started. This is not a comprehensive list, nor is it intended to replace legal guidance. It is simply intended to give you an idea of some of the things your disclosures must include, and to give you a starting point in getting your business one step closer to GDPR compliance.

1

Keep your Privacy Policy well organized and easy to read. The GDPR places a strong emphasis on disclosing information to individuals in a simple, easily understood way, rather than the prior tendency to use complicated legalese. It should include an explanation of your internal Privacy Policy and practices.

2

What information is collected, why and how is it used?

- (a) Explain to individuals how information is collected. Do members fill out enrollment forms when applying to be a member? Can they call in to your support team for help on upgrading a membership or signing up for an event? These are both ways you can collect information.
- (b) Let them know if their information is passed on to any third-party processors, and why. We are one of those processors, and our Privacy Policies are in the process of being updated to better disclose the secure ways we store and process data. Additionally, you need to disclose any other third parties receiving personal data. For example, if membership payments are passed through a payment processor, you must disclose it.
- (c) Provide a description of how collected information is used.

- d) Our site pages use Cookies. We are updating our Cookie notices and will have disclosures in our general Privacy Policy. But, you should also disclose this information to your members. When our notices are updated, we will let you know.
- e) Give a description of communications or other contact an individual may receive by providing their personal information, such as placing him/her on a mailing list or receiving email receipts for recurring membership transactions.

3 Describe the choices available to your members regarding how their personal information is used. For example, give them details about how to change their preferences or make a request to delete their information. This is a good place to provide instructions on how to get in touch with your support team for assistance.

4 Provide members with the contact information and identity of your Data Protection Officer, if you have one.