GDPR Policy for the BSI newsletter

1. General Statement

According to the guidelines of the General Data Protection Regulation (GDPR), 25 May 2018, we hereby inform that we process personal data lawfully, fairly, and in a transparent manner in relation to the data subject based on Art. 6 Para. 1 lit. a, 7 of the GDPR. The email service provider MailChimp is used: the statistical surveys and analyses are performed and the data are processed based on our legitimate interests pursuant to Art. 6 Para. 1 lit. f of the GDPR.

2. Content of our newsletter

We only send newsletters reporting the updates about the work of the Blue Shield with the consent of the recipients or legal permission. The Blue Shield newsletters provide information about the activities carried out by the Board of Blue Shield International (BSI) as well as Blue Shield national committees. The latter information is collected by the Secretariat of the BSI and is deliberately provided by national committees for circulation among the members of the network of the Blue Shield.

3. Legitimate Interest

We have determined that our legal basis for data processing will be on “legitimate interests”. We have determined that this is appropriate because we use data in a way that the data subject would reasonably expect and we believe there is a minimal privacy impact. Our legitimate basis is the pursuit of our services as detailed above.

- The storage and processing of personally identifiable information is necessary for this purpose - to this end we will store and process only the information required maintain communications between the Blue Shield.

- We do not conflict with the Data Subjects interest in this manner and base this assumption on the fact that they will have a reasonable expectation that we will need to store and process their data order to perform this service.

**Benefit**: In terms of benefit, we benefit from being able to pursue our legitimate interests in maintaining communications between the Blue Shield network. Blue Shield national committees benefit through our support, and in maintaining this communication. There are no wider public benefits.

**Impact**: If we were unable to operate in the above way, our network would suffer significantly.

**Use of data**: We will not use the data in any unethical or unlawful way.
Necessity: The processing furthers the interests of the Blue Shield Board, and the interests of Blue Shield committees. The processing of data and the matching of candidates to receive the newsletter (i.e. those response for national committee communications) is reasonable and fair. There is no way that we can best serve national committee interests by collecting less data or operating in a less intrusive way.

Possible impacts: As far as the storage and processing of personal information is concerned we do not believe there is any possible impact on the Data Subject because of the storage.

4. Opt-in and storage of the data

In 2018, national committees were contacted to inform them a regular newsletter was being prepared to allow them to opt out before it was sent. On the 20th December 2018, an email was sent to the board of BSI and members of national committees to allow them to opt-out of our mailing list.

Personal information (first name, surname, committee position, name of the national committee of the Blue Shield, and email address) is stored in a password protected file and is accessible only by the Secretary and Secretariat of the Blue Shield. These details will not be shared with any third parties without people’s explicit consent.

The newsletter is dispatched by “MailChimp”, a newsletter distribution platform of the US provider Rocket Science Group, LLC, 675 Ponce De Leon Ave NE #5000, Atlanta, GA 30308, USA.

The email addresses of our newsletter recipients and their further details described above are stored on the MailChimp servers in the USA. MailChimp uses this information to send the newsletters and provide evaluation/use data on our behalf. MailChimp can, by its own admission, also use this data to enhance or improve its own services, e.g. to technically enhance the dispatch procedure and display of the newsletter, or for commercial purposes to be able to determine which countries the recipients are from. However, MailChimp will not use the data of our newsletter recipients to contact them itself or forward it to third parties. We trust the reliability, IT security and data security of MailChimp. MailChimp is certified under the US-EU data privacy agreement “Privacy Shield” and agrees to comply with the EU data privacy guidelines. We have also concluded a “Data Processing Agreement” with MailChimp. This is an agreement in which MailChimp is obligated to protect the data of our users, to process it in accordance with its privacy policy on our behalf and must not forward this information to third parties. You can view the MailChimp privacy policy here.

Mailchimp reserves the right to view, copy, and internally distribute Content from our Campaigns and account to create algorithms and programs (“Tools”) that help them spot problem accounts and improve the Service. They use these Tools to find Members who violate these Terms or laws and to study data internally to make the Service smarter and create better experiences for Members and their contacts.

Our emails contain a “web beacon”, i.e. a pixel-size file that is retrieved from the MailChimp server when opening emails. This involves the retrieval of technical information such as information on the browser and your system, as well as your IP address and the time of retrieval. This information is used to make technical improvements to services based on technical data or the target groups and their reading behaviour based on their retrieval locations (that can be determined with the IP address) or access times.

The statistical surveys also involve determining whether the newsletters are opened, when they are opened and which links are clicked on. This information may be assigned to individual newsletter
recipients for technical reasons but it is neither our intention nor that of MailChimp to monitor individual users. The evaluations instead help Blue Shield International to recognise the reading habits of our users and to adapt our content to them or to send different content based on our users’ interests.

Mailchimp uses Google Maps and YouTube to provide certain features of the Service, and, as a result, they are contractually obligated to make Members aware of certain terms related to the use of such features. Therefore, in signing up to the newsletter, you acknowledge and agree that by signing up for an account and using the Service, you are also bound by the Google Maps/Google Earth Additional Terms of Service and the YouTube Terms of Service (including the Google Privacy Policy) (links here).

5. Opt-Out

The GDPR does not set a specific time limit for consent. For this reason, we will seek fresh consent only if the purposes for which we process personal details will change from those specified in the Paragraph 2. However, newsletter recipients may opt-out of receiving our newsletter AT ANY TIME, i.e. withdraw their consent. This means they also no longer consent to the distribution of this newsletter via MailChimp and the statistical analyses. It is not possible to cancel the distribution via MailChimp or the statistical evaluation separately.

A link to unsubscribe to the newsletter can be found at the end of each BSI newsletter, or alternatively you can email the Secretariat of the Blue Shield (Dr Emma Cunliffe emma.cunliffe@ncl.ac.uk) to have your details removed from our mailing list.

6. Data collector contact details

For questions on the collection, processing or use of personal data, for information or for corrections, please contact the Secretariat of the Blue Shield at the following address:

Dr. Emma Cunliffe
School of Arts and Cultures
Armstrong Building
Newcastle University
NE1 7RU
United Kingdom

Email: emma.cunliffe@newcastle.ac.uk

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