

GDPR PRIVACY NOTICE

To help the Worldwide Industrial Telemetry Standards (WITS) Protocol Standards Association (referred to as The PSA, we, us or our in this Privacy Notice) manage our relationship with you and provide a better service, we may need to collect, store and use information that can be used to identify you. From a legal point of view, this is known as 'processing personal information'.

We must by law comply with data protection law known as the General Data Protection Regulation (GDPR)

Looking after your personal information is as important to the PSA as it is to you. The information in this Privacy Notice will explain:

- Who we are
- How and why we process your personal data
- Your rights
- How you can get in touch with us if you need to

The WITS PSA's aim is to respect your privacy and comply with current UK data protection legislation (i.e. EU General Data Protection Regulation (GDPR) and the Data Protection Act 2018 (DPA)). References in this Privacy Notice are made to GDPR, but you should note that GDPR and DPA both apply in the UK.

SUMMARY NOTICE

- We keep to a minimum the information we hold about you.
- We use your information to provide our services to you, respond to your enquiries, manage our relationship with you and meet our legal obligations;
- We delete your data when we no longer need it.
- Generally, we do not share your personal information with third parties, but there are some exceptions.
- You have lots of privacy rights.
- We take security seriously.
- We are happy to answer your questions about any of this.

FULL NOTICE

The sections below tell you what personal information is, who we are and what we do, what personal information we collect and what we do with it.

They explain how GDPR protects you by explaining what the PSA is allowed to do with your personal information and clarify how to complain or withdraw your consent. They also tell you how long we keep your personal information, how you can get a copy of it or ask for it to be changed or removed, and with whom we might lawfully share your personal information.

Who we are and what we do

The WITS Protocol Standards Association (The PSA) provides for the long-term development, maintenance and management of the WITS-DNP3 Protocol Standard. Members are mostly drawn from the Utilities industry – both users (mainly water companies) and vendors/manufacturers of telemetry equipment. The PSA has its own independent elected committee drawn from members of both the vendor and user communities. The PSA has ownership of the Standard and has the responsibility to ensure that the long term maintenance of the Standard is secure in order to prevent it from becoming fragmented.

The PSA's office address is:

WITS Protocol Standards Association,
16 Thorndale Close,
Weston-Super-Mare,
Somerset.
BS22 8QD

enquiries@witsprotocol.org

Who does this Privacy Notice apply to?

This Privacy Notice relates to the collection and use of the personal information of individuals, sole traders and individuals in non-limited business partnerships. Although data about larger commercial entities is not considered 'personal' information (and therefore not captured by GDPR), where the PSA can identify an individual acting in their professional capacity, either directly or indirectly, the legislation will apply.

It is intended that this Privacy Notice covers the following:

- Existing, potential and previous members and those acting on their behalf;
- Suppliers (and/or their staff);
- Contractors (and/or their staff);
- Visitors to our site;
- Advisors to all of the above or other people providing assistance to them;

What is personal information?

Personal information is anything that identifies and relates to a living person. This can include information that, when put together with other information, can then identify a person; for example, your name and contact details.

How do we collect personal data?

- Over the telephone, in a letter or email.
- We may also collect personal information given to us if we meet in person - for example, visiting your business premises;
- When you have given a third party permission to share with us the information they hold about you;
- When you take part in engagement activities;
 - Via an application form,
 - Via articles, which may include photographs.
 - At public information meetings and with the attendees' informed consent, for the purposes of keeping them updated on the project that affects them.

What personal information we collect

- Members names, email addresses and postal addresses for purposes of communicating to Members and other interested parties:

Members supply information on the Membership Application forms or via email. Only business email, business telephone numbers and business postal addresses are kept.

- Members banking details for expense reimbursement

These details are kept for those Members who have incurred an approved expense so that they can be reimbursed using Bank transfers.

How do we use personal information?

- For sending out news items to Members about the Association
- For sending out Membership renewal invoices and reminders
- For sending out general circular emails to Members
- For answering general queries from Members
- For statistical analysis of membership

Who we share your personal information with and why

- The PSA's Website hosting supplier as they manage the website
- Payment information (bank account, sort code, Direct Debit mandates, etc.) are shared with banking institutions to process your payments

Our lawful basis for processing personal data

The basis for our processing the data is legitimate interests

We have checked that legitimate interests is the most appropriate basis.

We understand our responsibility to protect the individual's interests.

We have conducted a legitimate interests assessment (LIA) and kept a record of it, to ensure that we can justify our decision.

We have identified the relevant legitimate interests.

We have checked that the processing is necessary and there is no less intrusive way to achieve the same result.

We have done a balancing test, and are confident that the individual's interests do not override those legitimate interests.

We only use individuals' data in ways they would reasonably expect, unless we have a very good reason.

We are not using people's data in ways they would find intrusive or which could cause them harm, unless we have a very good reason.

We have considered safeguards to reduce the impact where possible.

We have considered whether we can offer an opt out.

We keep our LIA under review, and repeat it if circumstances change.

Your rights in relation to personal data

You have a number of rights under data protection law known as the General Data Protection Regulation (GDPR)

- The right to access: You have the right to access the personal data that we hold about you and the purposes for which we are using it. We may ask for proof of identity. On receipt of such a request we will endeavour to respond to you as soon as possible, at most within one calendar month.
- The right to rectification: You have the right to request that we amend any personal data which is incorrect or requires updating
- The right to erasure: You have the right to request that we delete any personal information that we hold about you. We will assess any such request on a case by case basis and will endeavour to respond to you as soon as possible, at most within one calendar month.

- The right to be informed: You have the right to be informed of what data we store about you and how we store your data
- The right to restrict processing You have the right to instruct us to restrict the type of processing that we carry out using your data
- The right to data portability You have the right to get your personal data from us in a way that is accessible and machine-readable, for example as a csv file. You also have the right to ask us to transfer your data to another organisation if technically feasible.
- The right to object You have the right to object to the PSA processing (using) your personal data at any time. This effectively means that you can stop or prevent us from using your data. However it only applies in certain circumstances, and you may not need to stop if we can give strong and legitimate reasons to continue using your data.

Note that you can only object to processing when we are using your data:

- for a task carried out in the public interest;
 - for the exercise of official authority;
 - for your legitimate interests;
 - for scientific or historical research, or statistical purposes; or
 - for direct marketing purposes.
- Rights in relation to automated decision making and profiling. This is irrelevant – we do not carry out any automated decision making.

If you would like to exercise any of these rights please contact us via enquiries@witsprotocol.org or by post at 16 Thorndale Close Weston-super-Mare BS22 8QD

Protecting your personal information

We are committed to ensuring that your personal information is secure. In order to prevent unauthorised access or disclosure, the PSA has put in place appropriate technical, physical and organisational procedures to safeguard and secure the information we collect about you.

Where is your personal information processed?

In the UK.

How do we secure personal data?

There are measures:

- to protect data against accidental loss – by taking regular data backups which are stored both at our offices and in the cloud in secure site
- to prevent unauthorised access, use, destruction or disclosure of personal information - by restricting access to the data
- to ensure business continuity and disaster recovery - by ensuring backups are stored securely

How we process your personal information

The PSA will process the personal information you provide in a manner that complies with current UK data protection legislation. The PSA will endeavour to:

- keep your information accurate and up-to-date,
- not keep it for longer than needed, and
- keep it safe, only permitting access to those who need to use it.

Personal information that you supply to us may be used only for purposes of communicating to Members and other interested parties

How long we keep your personal information

We will review any personal data we retain for secure disposal every two years to ensure we do not keep your personal information longer than is necessary. The law, business needs and our regulatory requirements determine the length of time information has to be kept. The various retention periods for your personal information (dependent upon record type) are detailed in The PSA's Processing Log.

A copy can be requested from the Data Protection Officer, whose contact details are provided later in this notice.

When data is no longer required it is deleted from our system.

Special Category information

No Special Category information is processed.

Changes to this Privacy Notice

We continually review and update this Privacy Notice to reflect changes in our services as well as to comply with changes in data protection legislation. We would therefore encourage you to review this Notice which is available on the website at www.witsprotocol.org on a regular basis.

Links to other websites

The PSA's website may contain links to third-party websites. We are not responsible for the privacy practices of those other sites. When you leave our site, please be sure to read the privacy statements of each website that collects personal information about you. This Privacy Notice applies solely to information collected and processed by the PSA.

Where can I get advice or make a complaint?

Ed Oborn
Data Protection Officer
WITS Protocol Standards Association,
16 Thorndale Close,
Weston-Super-Mare,
Somerset.
BS22 8QD

Email: enquiries@witsprotocol.org

If you are unhappy about how we process your personal information or with our response to any request you have made relating to it, you can complain to the Information Commissioner's Office at the address below.

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

Telephone: 0303 123 1113 (local rate) or 01625 545 745 (national rate)
Email: casework@ico.org.uk
Website: www.ico.org.uk

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