

Chance Encounters Privacy Policy

As the proprietor of Chance Encounters, I recognise my responsibilities under the General Data Protection Regulations (GDPR) – (EU) 2016/679 - in relation to personal data collected from and about clients (and their living relatives) during genealogical research.

In order to ensure compliance with this important legislation, I have adopted the following practices.

How is client consent obtained to the collection of personal data?

Chance Encounters has a legitimate interest in the use of any personal data provided by a client for the purpose of specified genealogical research. The GDPR does not require the consent of very living person found (other than the client) within the course of the research (as this would prove 'impossible or would involve a disproportionate effort', **for historical research purposes**).

Before commencing a genealogical research project, I will ask clients to sign a formal consent form, agreeing to the collection and processing of personal data in line with the contract of work to be performed and the principles set out below.

What information will be collected and how will it be processed?

In the normal course of business, I collect client data relevant to the genealogical research services I provide. More specifically these data are identified as:

- The name and personal contact details (email, postal address and telephone number as relevant to each case) of the client for billing purposes and routine contact related to the research project.
- The name and contact details (email, postal address or telephone number as relevant to each case) of potential clients for communication purposes.
- Where required by the research brief, I will obtain from the client, or via genealogical data sources, the full names (including previous names), birth and marriage details (dates and places), addresses (or general localities) and occupations of living relatives.

How will personal data be recorded and stored?

Personal data may be stored and processed electronically or as 'hard copy'. Security of data is achieved through appropriate password protection of electronic devices or locked desks/filing cabinets sited within a room dedicated to my business activities.

In order to facilitate transfer of large digital files, research material (including finalised reports) may be temporarily uploaded to a 'cloud' based storage service provider. This copy will be deleted upon confirmation of download by the client.

How will a client's right to privacy be protected?

- I will not pass personal data to any third party, unless required by law enforcement agencies or with the specific consent of the client. In both instances the client will be given the details of the third party involved.
- I will not use personal data belonging to clients or any living relative being researched for marketing purposes.
- Clients will not be identifiable from any testimonials posted to the Chance Encounters website.
- When using an electronic device for client research in a remote location (e.g. local archives), I will exercise due care and diligence to ensure that personal data is not compromised.
- Where a client requests a hard copy of the final research report, this will be sent by recorded or registered mail, as specified.

How long will personal data be retained?

- Digital copies of client reports will be stored indefinitely. It is the nature of genealogy that clients may wish to re-visit the services I provide at some future date and, in these circumstances, a copy of past reports should be available.
- E-mail communications with clients will be held for one year after the completion of the research project, to provide for continuity of service in the event of subsequent query or a request for further research. E-mail communications with potential clients will be retained for a similar period.
- In order to satisfy the requirements of HMRC in relation to my business, I will keep invoices, receipts, contracts and financial spread-sheets containing the client's name and contact details for up to seven years.

Requesting, Changing or Removing Information.

- You have the right to request a copy of the information I hold about you.
- You are entitled to have any errors in the information I hold about you rectified.
- You may ask for any have information I hold about you to be removed or destroyed (except those records held for tax purposes as detailed above).

How to contact me

Please contact me if you have any questions about my privacy policy, or the information I hold about you, via the Chance Encounters contact page at <https://www.chance-encounters.co.uk/contact>

Further Information

I reserve the right to amend this Data Protection and Privacy Policy at any time.

You can read full GDPR guidance notes here: <https://ico.org.uk/media/for-organisations/data-protection-reform/overview-of-the-gdpr-1-13.pdf>

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