

1. Privacy Policy

Region 9 of Overeaters Anonymous (R9) upholds our 12th Tradition of anonymity, and is committed to protecting the privacy of everyone who shares their personal information with us.

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Scope of this policy

R9 will process personal data of OA members and non-members. Individuals may subscribe to the newsletter, members may attend R9 meetings, and may act as Officers for R9. Registers will be kept of meetings, and contact details saved to email accounts. If members arrange events or workshops and produce publicity material then this will be distributed and published to the website. R9 oversees an annual Assembly which is hosted by the national OA fellowship of the country where the Assembly takes place.

R9 is committed to upholding the privacy of individuals whose personal information is being processed, and this policy describes how this commitment will be met. It applies to R9 officers, representatives, and OA members who deal with personal data on behalf of R9 or in connection with R9 (including service bodies which host R9 events).

This policy should be read in conjunction with the Data Protection Policy and the Information Security Policy.

General principles

R9 takes full responsibility for the personal information we process. Privacy will be protected, and personal information never disclosed, unless with explicit consent, or where this is to a data processor (like Dropbox, or our website hosts) or where this is required by law. We will only use personal data for the purpose which it was disclosed, and securely delete / destroy it once it is no longer required.

R9 Officers, Subcommittee members, Trustees and Representatives

OA members giving service to R9 in any of these positions will supply their contact details to R9 so that they can be contacted in order to fulfil their role within OA. If their contact details change they should notify the Chair of R9 (chair@oaregion9.org) so that the records can be updated.

The details of the officers / representatives will be held on record for the period stated in the table below. If they have signed a register of attendance at meetings then this record will be kept as below. Details will not be shared with third parties, save that email addresses will (in the course of their use) be shared with email providers, and information will be held on Dropbox.

If any officer or representative would like to object to the processing of their data, or request that processing be restricted, they should do so in writing to the Chair of R9.

Sponsor lists, Translation Lists

R9 maintains lists of individuals who have agreed to act as sponsors / provide 12 step outreach or provide translation of documents. Other similar lists may be generated at times. Consent will be sought and obtained from people named on the list, who may have their information removed at any time.

Assembly / Convention attendees

Individuals are required to register in advance of attending the R9 Assembly / Convention, and at that point they will be provided with a privacy notice which explains who will hold their data and how it will be processed. The period for which data will be retained is set out in the table below. Different principles apply to those attending in a personal capacity as compared with those who are attending in a service position.

Group representatives (information received from WSO)

OA World Service Organisation holds a register for OA meetings globally. Local groups and service bodies are required to provide contact details to this register. This data is then shared by WSO to R9 so that R9 can reach out to representatives within the area covered by the Region. This may include full names (if given to WSO), home address, email address and telephone number. If any individual wishes to be removed from the list held by WSO then they will need to contact WSO directly. They can contact R9 to have their details deleted from the R9 records.

Events flyers

OA members sometimes supply their contact details in flyers and promotional material for events and workshops. The flyers supplied to R9 for this purpose will be published on the website. A record will be kept of what information is provided. Once the event has passed then the flyer will be removed from the website.

If the OA member wishes to have the flyer removed prior to the event then they should contact the Chair of R9 who will direct the Website Officer to ensure that the flyer is removed.

Data subject rights

Under the GDPR, data subjects (people whose data is being processed), have several rights:

- a) The right to [know](#) what data has been collected about them, and how such data has been processed
- b) The right to [make changes](#) to inaccurate data
- c) The right to [withdraw consent](#) to data processing
- d) The right to ask for data to be [deleted](#)
- e) The right to [object](#) to data processing, or for it to be [restricted](#)
- f) The right to [data portability](#) (this only applies to automated processing, which does not happen in the context of R9)
- g) The right to [complain](#) to the Information Commissioners Office

If you would like to exercise any of these rights then please contact the Chair of R9.

Consent to share information outside EU

Region 9 covers a wide geographical area, extending beyond the EU to include countries and territories in Africa, the Middle East and Western Asia. This means that R9 officers and service bodies based outside the

EU may receive personal data via R9. Some may have data protection policies akin to the GDPR and others may not. In these circumstances the GDPR requires specific consent to be obtained from data subjects in order to permit their personal data to be processed. Such consent will be sought.

Right to access information

Individuals have the right to access any personal data that relates to them which R9 holds, and to be given the following information:

- The reason why the data is held
- The source of the data (if not directly from the individual themselves)
- Whether it has been disclosed to anyone else, and if so, who
- How long it will be stored
- The right to request that the data be updated, or deleted, or processing restricted in any way
- The right to lodge a complaint to the [Information Commissioners Office](#)
- Whether any automated decision-making was used to process the data
- Whether the information has been shared outside the EU and if so the mechanisms in place to protect data

This is called a 'subject access request'. Any person who wishes to exercise this right should contact the Chair of R9 via email (chair@oaregion9.org). The information should be provided within 30 days, without charge. The Chair will always verify the identity of anyone making a subject access request before handing over any information.

Process for subject access requests

Any subject access requests should be forwarded to the Chair of R9, who should record them in the SAR template.

The individual making the request should be contacted and their identity confirmed, if necessary by a telephone conversation, or by being asked to supply written evidence of their identity.

The Chair should collaborate with other Officers to identify all information which is held concerning the subject. OA does not collect a great deal of personal data, and so it is likely that the information will be limited to their inclusion on a list, register of attendance at meetings, and their subscription to the newsletter, however if the person has been an officer or R9 representative or trustee then there may be more information, including emails from them and concerning them.

All material should be reviewed and an assessment made of whether it can be immediately disclosed, or whether disclosure may adversely affect the rights and freedoms of another individual. Information about a third party should not be disclosed, and this can be edited out of documents.

Nothing should be disclosed that might prejudice a legal investigation, or where disclosure would breach some other legal duty. Specialist advice should be sought if there is any concern about whether disclosure should not be made.

The general rule is that material should be disclosed within 30 days of the request being made, although if it will take longer to prepare the disclosure then the subject should be contacted within 30 days, and informed of the delay and likely timescale for disclosure. Disclosure must be made within 90 days of the request.

If no information is held about the data subject then they should be informed.

If information is held but no disclosure is made then the data subject should be informed that no action will be taken on their request, and that they have the right to complain to the ICO.

A brief description of the disclosure should be recorded in the SAR template, together with the timing of any disclosure, and any non-disclosed material, with reasons given for non-disclosure.

Archiving and retention

Personal data should only be stored for the minimum period necessary, consistent with the purpose for which it was processed. Once the retention period has elapsed it is the responsibility of the person controlling the data to delete it. Officers are responsible for managing their own Dropbox folders and email accounts, and R9 representatives responsible for their group's email addresses.

Description of data	Period to keep
Contact details for R9 Officers (including sub-committees)	1 year after leaving office
Register of R9 meeting attendance	1 year after attend meeting
Emails	1 year after email received or sent
Financial records (including emails)	6 years after end of financial year to which they relate
Events agenda packs	6 years after event, to enable follow up and accountability, including financial accountability
Dropbox folder contents	Officer access to Dropbox deleted by Dropbox Admin once handover period finished Contents of folders deleted in accordance with this table
Sponsor List / Translations List (or similar)	Whilst consent is in place
Assembly / Convention attendees (personal capacity *)	Four months after attendance (to provide follow up material) *Fellows who are not officers and reps
Assembly Representative (service position)	Data will be kept for 2 years and 3 months after the assembly attended.
Data for local groups and service bodies received from WSO	This data is updated from WSO on a quarterly basis
Newsletter subscribers	Whilst consent is in place

Version

This policy was drafted on 5th May 2020, and approved by R9 on [INSERT DATE].

Any questions about this policy or any queries concerning data protection matters should be raised with the Chair of R9 (chair@oaregion9.org)