



May 2018

## Westcliff on Sea Women's Institute - Privacy Notice

Your privacy is important to the Westcliff on Sea Women's Institute (WOSWI). This privacy notice provides information about the different types of personal information that we collect and the ways in which we use it, although please note that not all of this will be applicable to you. If in doubt please feel free to check by contacting us using the contact details included at [clause 14](#).

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### 1. Who are we?

The Women's Institute (**WI**) was formed in 1915 to revitalise rural communities and encourage women to become more involved in producing food during the First World War. Since then the organisation's aims have broadened and the WI is now the largest voluntary women's organisation in the UK.

The WI is a three-tiered organization:

- The **NFWI** is the national charity, set up to represent WI members across the UK and provide guidance and support to federations and WIs. The NFWI board provides overall leadership to the WI organisation.
- Federations** are charities providing opportunities for various activities for WI members in their region. There are 69 federations across England, Wales and the Islands.
- WIs** are independent local charities open to any women over the age of 18. There are approximately 6,300 WIs across England, Wales and the Islands.

We are the Westcliff on Sea Women's Institute and we are part of the Essex Federation.

This privacy notice covers the use of personal information WOSWI. We also explain how your personal information is shared across the organisation.

Please note that the NFWI and Essex Federation, operates through their own separate websites and you should refer to the NFWI's own privacy policy to learn how it uses your personal information.

## **2. When do we collect personal information about you?**

We may hold information relating to you from a number of sources, and will collect personal information about you:

- a. When you give it to us **directly**  
For example, personal information that you submit through our website or by signing up to our newsletter, contacting us through the "Contact Us" form, making a donation, or any personal data that you share with us when you communicate with us by email, phone or post.
- b. When it is entered into the **MCS** by your WI or federation  
Your WI's MCS Rep will store your membership details in the Membership Communication System (MCS). Please refer to clause 6 for more information on the MCS.
- c. When you visit our **website**  
Our website may use cookies and other tracking technologies to improve your experience on our website and this can involve collecting personal data. Please refer to our Cookies Policy for details on the way our use of cookies may affect your personal data.

## **3. What personal information do we use?**

We will collect, store and otherwise process the following information as part of your WI membership:

- a. Your name and postal address.

In addition we may collect, store and otherwise process the following kinds of personal information:

- a. Additional contact details including your email address, telephone number(s), and social media identities if you opt to provide them;
- b. Information about our services which you use, such as WOSWI trips and events, the status of your WI membership; and
- c. Your communication preferences;
- d. Your tax status if you complete a Gift Aid form,
- e. Any other personal information you choose to share with us.

### Special categories of data

The EU General Data Protection Regulation (**GDPR**) recognises certain categories of personal information as sensitive, and therefore requiring more protection. These categories of data include information about your health, ethnicity and political opinions.

In certain situations, the NFWI may collect and/or use special categories of data (for example in order to make adjustments for any disabilities or dietary requirements you may have when attending our events). We will only process these special categories of data if there is a valid reason for doing so and where the GDPR allows us to do so. For instance, we will usually seek your explicit consent to use such data.

#### **4. How we use your personal information**

WOSWI may use your personal information:

- a. to provide you with services, products or information that you have requested;
- b. to provide updates about our meetings, services and activities (where necessary, and only where you have provided your consent to receive such information, e.g. explicitly subscribing to our newsletter);
- d. to invite you to NFWI, Federation or WI events we feel that you might be interested in;
- e. to answer your questions/ requests and communicate with you in general;
- f. to further our charitable aim in general, including for fundraising activities and asking for volunteer support;
- g. to analyse and improve our work, services, activities, products or information (including our website) or for our internal records;
- h. to audit and/ or administer our accounts;
- i. to include your contribution in our newsletter or on our website if you contact us with content;
- j. to satisfy legal obligations which are binding on us, for example in relation gift aid tax claims;
- k. for the prevention of misuse of service; and
- l. for the establishment, defence of enforcement of legal claims.

#### **5. Lawful processing**

We are required to rely on one or more lawful grounds to collect and use the personal information that we have outlined above. We consider the grounds listed below to be relevant:

**a. Consent**

Where you have provided your consent for our use of your personal information in a certain way, for example where we ask for your consent to send you a newsletter.

**b. Legal obligation**

Where the processing of your personal information is necessary for us to comply with a legal obligation to which we are subject.

**c. Contractual relationship**

Where it is necessary for us to process your personal information in order to perform a contract to which you are a party (or to take steps at your request prior to entering a contract), for example when booking a trip.

**d. Legitimate interests**

We rely on this basis where applicable law allows us to collect and use personal information for our legitimate interests and the use of your personal information is fair, balanced, and does not unduly impact your rights. For instance, it is in our legitimate interest to promote the aims and objectives of the NFWI and to use the personal data of members in order to do so.

#### **6. Membership Communication System (MCS) Database**

When you become a member of the WI, we enter the details you provided on our New Member Form onto the MCS database which NFWI are responsible for. The MCS database is our internal database of all WI members and is only accessible to your WI's MCS Rep and Federation and NFWI staff, who will use the information to administer your WI membership (for example to send you copies of *WI Life*, or if you have provided your email address to

authenticate your WI membership allowing you to access *My WI* and *WI Training*). If you are an officer, a committee member or have another role within the WI then NFWI also use your information to assist in the administration of those roles.

Please note that you are in full control of the information held in the MCS. If you would like to update any of your details, or would like to see the information held within the MCS please speak to your MCS Rep.

## **7. Do we share your personal information?**

WOSWI will not sell, rent or lease your personal information to others. However, we may disclose your personal information to selected third party processors (such as agents or sub-contractors) for the purposes outlined at [clause 4](#). The third party in question will be obligated to use any personal data they receive in accordance with our instructions. For instance, we engage a third party to host and maintain our website. We also use a third party provider, [MailChimp](#), to send out our newsletter. When you sign up for our newsletter your email address and, if provided, name is sent directly to MailChimp.

We reserve the right to disclose your personal information to third parties:

- a. when you make a request for information or a service and provide your personal information, we forward it to the appropriate regional contact, such as a local federation office, member of staff or volunteer, in order to accommodate your request;
- b. for auditing purposes e.g. finance audits;
- c. if we are under any legal or regulatory obligation to do so; and
- d. in connection with any legal proceedings or prospective legal proceedings, in order to establish, exercise or defend our legal rights.

## **8. International Data Transfers**

As we sometimes use third parties to process personal information, it is possible that personal information we collect from you will be transferred to and stored in a location outside the UK or the European Economic Area (**EEA**).

Please note that certain countries outside of the UK or EEA have a lower standard of protection for personal information, including lower security protections. Where your personal information is transferred, stored, and/or otherwise processed outside the UK or EEA in a country which does not offer an equivalent standard of protection to the UK or EEA, we will take all reasonable steps necessary to ensure that the recipient implements appropriate safeguards designed to protect your personal information. If you have any questions about the transfer of your personal information, please contact us using the details at [clause 15](#).

When you sign up to our newsletter, our third party provider, [MailChimp](#), stores your email address (and, if you provide it, your name) on servers in the United States. They will only use it for the purpose of sending you the newsletter you have subscribed to. MailChimp is certified under the [Privacy Shield](#). You can easily unsubscribe from the newsletter by clicking on the “unsubscribe” link provided at the end of the email, or send an email to [dataprotection@nfwl.org.uk](mailto:dataprotection@nfwl.org.uk).

## 9. Securing your personal information

We will take all reasonable technical and organisational precautions to prevent the loss, misuse or alteration of your personal information. We restrict access to those who have a need to know.

## 10. How long do we keep your personal information?

Unless still required in connection with the purpose for which it was collected and/or processed, we will generally remove your personal information from our records six years after the date that it was collected. For instance, if you cancel your WI membership, we will usually delete your personal data from our records 6 years after your cancellation. However, before this date: (i) if your personal information is no longer required in connection with such purpose(s); (ii) we are no longer lawfully entitled to process it; or (iii) you validly exercise one of your rights of erasure under [clause 12](#), we will remove it from our records.

## 11. Your rights and preferences

We may contact you by post unless you request otherwise, and by telephone, email, social media or other electronic means depending on the communication preferences you have previously indicated.

Where we rely on your consent to use your personal information, you have the right to withdraw your consent at any time.

When we use your personal information you have the right to:

- a. Ask us for **confirmation** of what personal information we hold about you, and to request a copy of that information. If we are satisfied that you have a legal entitlement to see this personal information, and we are able to confirm your identity, we will provide you with this personal information.
- b. Request that we **delete** the personal information we hold about you, as far as we are legally required to do so
- c. Ask that we **correct** any personal information that we hold about you which you believe to be inaccurate.
- d. **Object** to the processing of your personal information where we: (i) process on the basis of the legitimate interests ground; (ii) use the personal information for direct marketing; or (iii) use the personal information for statistical purposes.
- e. Ask for the **provision** of your personal information in a machine-readable format to either yourself or a third party, provided that the personal information in question has been provided to us by you, and is being processed by us: (i) in reliance on your consent; or (ii) because it is necessary for the performance of a contract to which you are party; and in either instance, we are processing it using automated means.
- f. Ask for processing of your personal information to be **restricted** if there is disagreement about its accuracy or legitimate usage.

At any point you can request to unsubscribe from our newsletter, or remove your personal information from the database by contacting us using the details listed in [clause 15](#).

Please note that where you ask us to delete your personal information we will maintain a skeleton record comprising your name and contact details to ensure that we do not inadvertently contact you in the future. We may also need to retain some financial records for statutory purposes, for example Gift Aid.

**Please note that** you also have the right to lodge a complaint with the Information Commissioner's Office at [www.ico.org.uk/concerns](http://www.ico.org.uk/concerns)

## **12. Other websites**

We are not responsible for the privacy practices or the content of linked web sites. Please review the privacy notices of such websites.

## **13. Updating this privacy notice**

We may update this privacy notice by posting a new version on this website. If we update this privacy notice in a way that significantly changes how we use your personal information, we will bring these changes to your attention. Otherwise, we would recommend that you periodically review this privacy notice to be aware of any other revisions.

## **14. How to contact us**

The WOSWI Committee is responsible for monitoring compliance with relevant legislation in relation to personal information. You can also contact any member of the Committee if you have any questions about this privacy notice or our treatment of your personal information.

**Last updated: 13 May 2018**