

May 2018



## West Yorkshire Federation of Women's Institutes - Privacy Notice

Your privacy is important to the West Yorkshire Federation of Women's Institutes (WYFWI). 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 79 WIs within the West Yorkshire Federation.
- **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.

The online services are owned by the National Federation of Women's Institutes (NFWI).

The **West Yorkshire Federation of Women's Institutes (WYFWI)** is incorporated in England and Wales as a Company Ltd by Guarantee No: **2737120**. Charity registration no. **1017012**.

## 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 by signing up to a newsletter, or by booking on to a Federation event using the Ticket Order form or individual booking 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 the **WYFWI pages** on the **NFWI website**  
The NFWI uses 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 attendance at Federation events and meetings with WYFWI staff that you have attended and the status of your WI membership; and
- c. Your communication preferences;
- d. Your curriculum vitae and employment experience if you apply for a job with us;
- 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 WYFWI 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**

The WYFWI may use your personal information:

- a. to provide you with services, products or information (such as the West Yorkshire News - WYN) that you have requested;
- b. to provide updates about NFWI, the Federation, activities, publications or WI products (where necessary, and only where you have provided your consent to receive such information, e.g. explicitly subscribing to a specific newsletter);
- c. to invite you to WYFWI events we feel that you might be interested in;
- d. to process your donations;
- e. to answer your questions/ requests and communicate with you in general;
- f. to further our charitable aim in general, to gain membership, including for promoting activities and asking for volunteer support; (i.e. Knitting & Stitching Show)
- 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 WI accounts;
- i. to include your contribution in the West Yorkshire News - WYN or on our website pages if you contact us with content;
- j. to satisfy legal obligations which are binding on us, for example in relation to law enforcement requests or due diligence checks before accepting major donations;
- k. for the prevention of fraud or 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 a private subscription to WYN or use of the FIFE scheme.

**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 WYFWI and to use the personal data of WI Officers in order to do so.

## **6. The Membership Communications System (MCS) Database**

When you become a member of the WI, your local representative provides us with your personal information and it is stored on the MCS database which we 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 we 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 WI's MCS Rep.

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

The WYFVI 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 potential members) for the purposes outlined at clause 4.

We use a third party – **Dropbox** to store all our data, to facilitate the administration of Federation events etc.

We also use a third party provider, **SurveyMonkey**, to facilitate our surveys. The information you provide is sent directly to SurveyMonkey.

## **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.

The WYFVI occasionally conducts online surveys to assist with our Federation 5 Year Plan. Our third party provider, SurveyMonkey, stores your personal data on servers in the United States. They will only use it for the purpose of facilitating the survey. SurveyMonkey is certified under the Privacy Shield.

**Dropbox** might store your name, email address and any other personal information you provide to help us facilitate Federation events on servers in the United States. They will not use your data for any purpose and is certified under the Privacy Shield.

## 9. Securing your personal information

The WYFWI 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 and we train staff in handling the information securely. The WYFWI will store all the personal information you provide on secure servers.

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

We will delete all personal data 3 months after an event date. 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

The WYFWI 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, (i.e. to potential new members) or (iii) use the personal information for statistical purposes.

At any point you can request to unsubscribe from any WYFWI correspondence by contacting us using the details listed in clause 14.

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**

The WYFWI is 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**

The WYFWI may update this privacy notice by posting a new version on our web pages on the NFWI 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 WYFWI's Privacy Officer is responsible for monitoring compliance with relevant legislation in relation to personal information. You can also contact the Privacy Officer if you have any questions about this privacy notice or our treatment of your personal information:

Email: [westyorksfd@gmail.com](mailto:westyorksfd@gmail.com)

Telephone: 0113 255 0810

Post: FAO Privacy Officer, 164/166 Town Street, Rodley, Leeds LS13 1HP

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website