



## WSFWI Privacy Policy

Your privacy is important to the West Sussex Federation of Women's Institutes (the **WSFWI**). 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 contact us by 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 organisation:

1. **National Federation of Women's Institutes (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.
2. **Federations** are charities providing opportunities for various activities for WI members in their region. There are 69 federations across England, Wales and the Islands.
3. **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.

Our online services are owned by both the NFWI and WSFWI. The NFWI is incorporated in England and Wales as a Company Limited by Guarantee, no. 2517690, charity registration no. 803793.

WI Enterprises Ltd. (**WIE Ltd.**) is a subsidiary of the NFWI, incorporated in England and Wales, company no. 1339906. WIE Ltd. is the trading arm of the NFWI and helps raise funds for the NFWI to help finance the work of the WI.

WSFWI is incorporated in England and Wales as a Company Limited by Guarantee, no. 2917631, charity registration no. 1036497.

This privacy notice covers the use of personal information by both the NFWI and WIE Ltd, and by WSFWI, and it will clarify in what circumstances we use your personal information. We also explain how your personal information is shared across the organisations.

## 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 by signing up to a newsletter, contacting us through the "Contact Us" form, making a donation, booking a WSFWI event through Eventbrite, 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 **Membership Communications System (MCS)** by your WI or WSFWI. Your WI's MCS Rep will store your membership details in the Membership Communication System (MCS) when you join the WI and when your details are checked annually or when any details need to change. Please refer to clause 6 for more information on the MCS.
- c. When you visit a NFWI **website** or the **WSFWI webpages** hosted on the NFWI website. The NFWI uses cookies and other tracking technologies to improve your experience on the NFWI website and this can involve collecting personal data. Please refer to the NFWI Cookies Policy<sup>1</sup> for details on the way NFWI use of cookies may affect your personal data.
- d. When you make a purchase through the **NFWI online shop**<sup>2</sup>, WIE Ltd. will collect your personal information in order to fulfil any purchase of services or goods you make through our online shop.
- e. When you book tickets for a WSFWI event through the Eventbrite<sup>3</sup> ticketing service.

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<sup>1</sup> <https://www.thewi.org.uk/cookies>

<sup>2</sup> <https://shop.thewi.org.uk/>

<sup>3</sup> <https://www.eventbrite.co.uk/security/>

### **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:
- b. Additional contact details including your email address, telephone number(s), and social media identities if you opt to provide them;
- c. Information about our services which you use, such as attendance at NFWI events and meetings with NFWI staff that you have attended and the status of your WI membership; and
- d. Your communication preferences;
- e. Your curriculum vitae and employment experience if you apply for a job with us;
- f. Information about your computer/ mobile device and your visits to and use of this website, including, for example, your IP address and geographical location;
- g. WIE Ltd. will collect information about your order (but not your financial information) when you make a purchase through our online shop; and
- h. Any other personal information you choose to share with us.

#### Special categories of data

The UK 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 and WSFWI 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 or to provide an audio version of our magazine *WI Life*). 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 NFWI and WSFWI may use your personal information:

- a. to provide you with services, products or information (such as *WI Life* magazine or communication emails from WSFWI) that you have requested;
- b. to provide access to “member-only” services such as My WI and WI Training;
- c. to provide updates about our work, services, activities, publications or products (where necessary, and only where you have provided your consent to receive such information such as explicitly subscribing to a specific newsletter);
- d. to invite you to NFWI and WSFWI events we feel that you might be interested in;
- e. to process your donations;
- f. to answer your questions/ requests and communicate with you in general;
- g. to further our charitable aim in general, including for fundraising activities and asking for volunteer support;

- h. to analyse and improve our work, services, activities, products or information (including our website) or for our internal records;
- i. to process your application for a job when you apply by contacting us via our website;
- j. to audit and/ or administer our accounts;
- k. to include your contribution in the *WI Life* Magazine or one of our websites if you contact us with content;
- l. 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;
- m. for the prevention of fraud or misuse of service; and
- n. for the establishment, defence or enforcement of legal claims.

WIE Ltd. will also use your personal information to fulfil the purchases you make through the online shop.

## 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 WIE Ltd. relies on this ground in order to fulfil any order you make in the online shop.
- 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 WSFWI 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, your local representative provides us with your personal information and it is stored on the MCS database which NFWI is 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 NFWI and WSFWI 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, NFWI may engage a third party to carry out audits on the way the NFWI magazine, *WI Life*, is received. NFWI also engages a third party to host and maintain the MCS database and other websites. NFWI also use a third-party provider, [MailChimp](#), to send out NFWI newsletters (for example the *NFWI Public Affairs Digest* and *NFWI-Wales Public Affairs Digest*). When you sign up for one of the NFWI newsletters your email address and if provided, name is sent directly to MailChimp.

NFWI and WSFWI may also use a third-party provider, [SurveyMonkey](#), to facilitate surveys. The information you provide is sent directly to [SurveyMonkey](#). NFWI also use a third-party provider, [Disqus](#), to provide commenting functionality on My WI. Your name, email address and IP address are shared with Disqus when a comment is added to an article on My WI.

NFWI also use a third-party supplier, [Zendesk](#), to provide the helpdesk software we use to support My WI. This includes the "Help?" widget shown across My WI. When you submit a request for help your name, email address and any other personal information you share in your request will be sent directly to Zendesk. NFWI use [Shopify](#) to power the NFWI online store. You can read more here: <https://www.shopify.com/legal/privacy>.

When you ask NFWI to provide you with information about your "current location" in order to find your closest WI, you will be prompted to allow your web browser (Internet Explorer, Chrome, Safari etc.) to send your estimated location. How this is determined will vary depending on the web browser you use, but for a general overview please refer to <https://www.mozilla.org/en-US/firefox/geolocation/>. In addition, when you add your postcode to identify your location, it is not saved on the NFWI website.

When you buy items in the NFWI online shop, your contact details and information about your order (not your financial details) are sent to authorised staff. Your financial details are collected by [Worldpay](#) directly via their website, subject to their [standard security measures](#), and are not retained by NFWI. NFWI also engage a third-party fulfilment house to deliver the products you purchase through the online shop. NFWI and WSFWI reserve the right to disclose your personal information to third parties:

- a. when you provide your personal information in the NFWI contact form, the form may be forwarded 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 where NFWI employ chartered accountants;
  - c. if NFWI or WSFWI 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.

Please note that certain countries outside of the UK 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 in a country that does not offer an equivalent standard of protection to the UK, 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 14](#).

The NFWI Public Affairs team or WSFWI may conduct online surveys to assist with our campaigns. 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](#).

When you sign up for one of the NFWI online newsletters, the 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 any newsletter by clicking on the “unsubscribe” link provided at the end of the email, or send an email to [dataprotection@nfwf.org.uk](mailto:dataprotection@nfwf.org.uk).

If you decide to comment on My WI content, the NFWI third-party provider, [Disqus](#), will store your name, email address and IP address on servers in the United States. They will only use your data for the purpose of providing the commenting functionality on My WI. Disqus is certified under the [Privacy Shield](#).

If you use the “Help?” widget on My WI, our third-party provider, [Zendesk](#), might store your name, email address and any other personal information you provide in your help request on servers in the United States. Zendesk is certified under the Privacy Shield. They will only use your data for the purpose of providing the helpdesk service we use to support members on My WI.

If you purchase or book tickets for WSFWI events, we use a third-party provider called Eventbrite. Eventbrite may collect personal data on behalf of the ticketing service and on behalf of WSFWI, including without limitation your name, address, email address and any other information that is required for the ticket purchase, and will store the

data on servers in the United States. Eventbrite also automatically collects certain technical data that is sent to them from the computer, mobile device and/or browser through which you access Eventbrite. Eventbrite is certified under the Privacy Shield, full information in the Eventbrite Privacy Notice<sup>4</sup>.

If you are a Trustee, staff member or member of a WSFWI Team, you may use services provided by Microsoft under license to WSFWI. Microsoft Corporation, as the data controller for the Microsoft accounts, collects and processes certain personal information in connection with your Microsoft account, the email address and password you use to sign in to Microsoft programs and services, and anywhere else you see the Microsoft account logo. Microsoft account information is stored on Microsoft servers located in the United States. The Microsoft Privacy Notice information is published on Microsoft websites<sup>5</sup>.

## 9. Securing your personal information

The NFWI and WSFWI 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 NFWI will store all the information you provide on secure servers.

## 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 11 we will remove it from our records.

## 11. Your rights and preferences

The NFWI and WSFWI 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.

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<sup>4</sup> [https://www.eventbrite.co.uk/support/articles/en\\_US/Troubleshooting/eventbrite-privacy-policy?lg=en\\_GB](https://www.eventbrite.co.uk/support/articles/en_US/Troubleshooting/eventbrite-privacy-policy?lg=en_GB)

<sup>5</sup> <http://go.microsoft.com/fwlink/?LinkID=204909>

- 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 interest 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.
- e. 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 any NFWI newsletters you have subscribed to or remove your personal information from the database 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 NFWI and WSFWI is not responsible for the privacy practices or the content of linked websites. Please review the privacy notices of such websites.

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

The NFWI may update this privacy notice by posting a new version on the NFWI website, or the WSFWI version on the WSFWI web pages hosted by NFWI. 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.

## **15. How to contact us**

The NFWI'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 the NFWI elements of this privacy notice or NFWI treatment of your personal information:

Email: [dataprotection@nfwf.org.uk](mailto:dataprotection@nfwf.org.uk)

Telephone: 020 7371 9300

Post: FAO Privacy Officer, 104 New Kings Road, London SW6 4LY, UK



The WSFWI Privacy Officer is responsible for monitoring compliance with relevant legislation in relation to personal information held by WSFWI. You can also contact the Privacy Officer if you have any questions about the WSFWI elements of this privacy notice or WSFWI treatment of your personal information:

Email: [privacyofficer@wsfwi.co.uk](mailto:privacyofficer@wsfwi.co.uk)

Telephone: 01243 783134

Post: WSFWI Privacy Officer, North Lodge, Northgate, Chichester, West Sussex PO19 1BJ

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**WSFWI REVIEW DATE: 5 September 2023**