

June 2018

Freeland Women's Institute (WI) - Privacy Notice

Your privacy is important to Freeland Women's Institute. 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](#).

1. **Who are we?**
2. **When do we collect personal information about you?**
3. **What personal information do we use?**
4. **How we use your personal information**
5. **Lawful processing**
6. **The Membership Communications System (MCS)**
7. **Do we share your personal information?**
8. **International Data Transfers**
9. **Securing your personal information**
10. **How long do we keep your personal information?**
11. **Your rights and preferences**
12. **Other websites**
13. **Updating this privacy notice**
14. **How to contact us**

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.

Our online services (MyWI, WI Training and MCS) are owned by the National Federation of Women's Institutes (the **NFWI**). The NFWI is incorporated in England and Wales as a Company Limited by Guarantee, no. 2517690, charity registration no. 803793.

This privacy notice covers the use of personal information by the Freeland Women's Institute. We also explain how your personal information is shared across the organisation.

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, 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**
The website host (Wix) used by Freeland W.I. uses cookies and other tracking technologies to improve your experience and this can involve collecting personal data. Freeland W.I. do not use the information collected by cookies in any way.
- d. When you apply to go on one of our (or OFWI/NFWI) events, trips, workshops or training courses we need your name, WI and, in some cases, emergency contact details, for health and safety reasons.

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 order to update the Membership Communication System (MCS) so that you receive your copy of WI Life.
- b. Your email address and telephone number so that we may contact you about WI activities etc if you opt to provide them.
- c. Your birthday date/month so we can give you a birthday card if you so opt to provide them.
- d. Photographs of you at WI meetings, activities and events if you consent to have your photograph taken and put on our website and Facebook page.
- 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, Freeland W.I. 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. What personal information do we use?

The Freeland W.I. may use your personal information in the following ways:

- a. If you are President or Secretary of your WI your name and telephone number will be sent to OFWI for inclusion in OFWI Directory where you have provided consent for it to be included;
- b. 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, e.g. explicitly subscribing to a specific newsletter);
- c. to invite you to WI 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, 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 on our website or Facebook page 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 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 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 NFWI with your personal information and it is stored on the MCS database which NFWI are responsible for. The MCS database is NFWI's 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.

With your consent, we download your name, address, email and contact information from the MCS in order that the Freeland W.I. committee may contact you regarding, for example Freeland W.I. activities or to forward information from NFWI/OFWI.

7. Do we share your personal information?

The Freeland W.I. 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 our website and to manage our email accounts and hold our data securely.

The Freeland W.I. will not share your personal information downloaded from the MCS with anyone other than the committee without your consent.

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

- a. when you provide your personal information in our contact form, the form may be forwarded to the appropriate contact, such as a local WI office, member of staff or volunteer, in order to accommodate your request;
- b. for auditing purposes e.g. finance audits where we employ chartered accountants;
- 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 14](#).

Our email and data storage provider, Microsoft, holds our data in the UK and is GDPR compliant.

Our website host, Wix, may store and process data in the United States, Europe and Israel. Wix is fully GDPR compliant. You may view Wix Privacy Policy at [wix.com](https://www.wix.com/privacy)

9. Securing your personal information

The Freeland W.I. 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 Freeland W.I. will store all the personal 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 Freeland W.I. 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 any Freeland W.I. email lists, newsletters etc 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

12. Other websites

Freeland W.I. 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 Freeland W.I. may update this privacy notice by posting a new version on our website or making a copy available at monthly meetings. 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 Freeland W.I.'s Committee is responsible for monitoring compliance with relevant legislation in relation to personal information. Should you have any questions about this privacy notice or our treatment of your personal information, you should contact the Freeland W.I. Secretary in the first instance.