



GDPR Policy Statement

The Women's Liberation Collective will ensure that all personal data that it holds will be:

- Processed lawfully, fairly and in a transparent manner.
- Collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes.
- Adequate, relevant and limited to what is necessary.
- Accurate and kept up to date.
- Kept in a form which permits identification of data subjects for no longer than is necessary.
- Processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage.



Privacy Policy - Trustees

It is important to us that you understand and are happy with how we use your information.

Identity and contact details of the controller

The Charity's Data Controller is the Chief Executive Officer.

The Controller can be contacted via:

Phone: 07898 138162; E-mail: info@ownmylifecourse.org

Data Subjects

This Privacy Policy applies to all trustees of the Charity.

Purpose of the processing and the lawful basis for the processing of data

The charity will only hold and process personal data on bases which are lawful.

The same personal data may be held and processed for different purposes and, therefore, under different lawful bases, as identified on the form used to collect the data from the subject.

The lawful bases and purposes under which personal data may be processed by the charity are as follows:

1. Legal Obligation {LO}

- The charity holds and processes the personal data, identified as LO, to enable the charity to comply with relevant legislation regarding the identity of persons who have a significant role in the governance of the charity.
- Data held under legal obligation will only be processed for the relevant purposes as is required by law and will only be shared with other organisations (e.g. Charity Commission; HM Revenue & Customs) as is allowed by law and which are compliant with the General Data Protection Regulation. This will include the sharing of personal data which are, by law, destined for the public domain (e.g. the names of trustees to be held and displayed in the Charity Commission's public Register of Charities).

2. Legitimate Interest {LI}

- The charity legitimately needs to hold the personal data, identified as LI, about its trustees for the purpose of administering the charity efficiently, effectively and economically in pursuit of its charitable purposes.
- This will include, but is not limited to, the communication of information relevant to the governance and administration of the charity to and between trustees, and the sharing of knowledge and expertise between trustees specifically to further the legitimate interests of the Board of Trustees for the benefit of the charity.



3. **Subject Consent {SC}**

- In your wider role as a member/supporter of the charity we may, subject to your consent, use your personal data to keep you informed of the wider activities of the charity, particularly those in which you have special experience and/or expertise or in which you have expressed a particular interest. This will include providing you with information relating to any fundraising activities which the charity undertakes.
- Your personal data will also be used to ensure that any activities which you are required, or are invited, to participate in are appropriately tailored to any specific needs that you have and, where appropriate, any potential for embarrassment is avoided.
- The charity will not share your personal data with any other individual, group or organisation for any purpose other than those which are directly related to the activities and charitable purposes of the charity.

The right to withdraw consent at any time

You have the right to withdraw your consent for the charity's use of your personal data which are provided by you with your consent for use by the charity for promoting its general activities and purposes.

You do not have the right to withdraw your consent for the charity's use of your personal data when the lawful basis for the charity holding and processing the data is either "Legal Obligation" or "Legitimate Interest".

The right to require the erasure of your data (right to be forgotten)

You have the right to require the charity to erase any or all of your personal data which are held by the charity for processing on the lawful basis of Legitimate Interest or Subject Consent.

You do not have the right to require the charity to erase any of your personal data held by the charity when the charity's lawful basis for holding and processing the data is "Legal Obligation".

The right to restrict processing

You have the right to require the charity to stop processing your data if you reasonably believe that there are significant inaccuracies in the data that we hold or that the way in which we process your data produces inaccurate results.

The right to portability

You have the right to require the charity to provide you with a printed or computer-readable copy (*i.e.* in a standard format which will allow the data to be transferred to another computer) of your personal data that it holds for processing on the basis of Legitimate Interest.

You do not have the right to require the charity to provide you with portable copies of data which it holds for the lawful purposes of Legal Obligation or Subject Consent.



The legitimate interests of the controller or third party, where applicable

1. Legitimate interests of the controller

The legitimate interests of the Controller (on behalf of the trustees of the charity) are:

- To ensure that the human resources available to the charity – both volunteers (including trustees) and employees – are used effectively, efficiently and economically to pursue the purposes of the charity for the public benefit;
- To promote and facilitate communication, cooperation and the sharing of experience and expertise between trustees, other volunteers, employees, beneficiaries and donors.

2. Legitimate interest of third parties

The legitimate interests of third parties are to ensure that the interests and well-being of the data subject are properly met when the charity's activities are carried out by the third party (e.g. providing transport to/from events, providing food and accommodation).

Any recipient or categories of recipients of the personal data

We may share your personal data:

- With the Charity Commission, HM Revenue & Customs, the Police, local authorities, the Courts and any other central or local government bodies where they request it and we may lawfully disclose it, for example for the prevention and detection of crime.
- With the Charity's professional advisors (e.g. our lawyers, accountants) when they need it to provide appropriate advice on the charity's activities. We will seek your permission before sharing your personal data in this way.
- Where we are legally obliged to do so (e.g. to comply with a court order).
- With other people who make a reasonable subject access request to us, provided that we are allowed to do so by law.

Retention period or criteria used to determine the retention period

- Your personal data processed on the basis of Legal Obligation and shared with HM Revenue & Customs are retained for the prevailing statutory period (currently 6 years).
- Your personal data processed on the basis of Legal Obligation and shared with the Charity Commission are retained for 3 years after you cease to be a Trustee.
- Your personal data processed on the basis of Legitimate Interest are retained for 2 years after you cease to be a Trustee.
- Your personal data processed on the basis of Subject Consent are retained for 3 months after you cease to be a Trustee.

Details of transfers to third country and safeguards

The Charity does not transfer any personal data to third countries.



The existence of each of data subject's rights

Other than the right to withdraw consent and the right to erasure you have all the data subject rights, as prescribed by the General Data Protection Regulation, namely:

The rights:

- a) to be informed about the your personal data held by the Data Controller on behalf of the Charity, - the purpose(s) for which they are held; - the manner in which they are processed; the recipients (if any) of the data;
- b) to be given access to your personal data;
- c) to rectification – the correction of any error in the data and/or the completion of any incomplete data;
- d) to restrict processing – while you have legitimate justifiable concerns about the accuracy, validity or legality of data held by the Charity or the way in which the data are being processed. Data process may be resumed once either the cause(s) of the concern has (have) been rectified or your concerns are demonstrated to be unjustified;
- e) to object to processing – while you have reasonable grounds relating to their impact on your particular circumstances and where the legal basis of the processing is Public Task or Legitimate Interest. However, the processing of your data can be resumed if the Data Controller can demonstrate compelling legitimate grounds for the processing which override your interests, rights and freedoms, or for the establishment, exercise or defence of legal claims.

The source the personal data originates from and whether it came from publicly accessible sources

Your personal data are not obtained from anyone other than yourself.

Whether the provision of personal data is part of a statutory or contractual requirement or obligation and possible consequences of failing to provide the personal data

The provision of your personal data for this is a statutory requirement under UK taxation and charity legislation.

Failure to provide the data, or the provision of data which are inaccurate or late, render both you and the Charity to significant penalties or legal action.

The existence of automated decision making, including profiling and information about how decisions are made, the significance and the consequences.

The Charity does not use any automated decision-making software in the processing of your personal data. Nor will the charity make your personal data available to any other organisation for such purposes.

The right to lodge a complaint with a supervisory authority

You have the right to lodge a complaint with the Information Commissioner's Office, the supervisory authority for the UK, if you are dissatisfied with the way that the Charity is collecting, holding, processing and using your personal data and you feel that your reasonable attempts to raise the issues and get them addressed have failed.

<https://ico.org.uk/make-a-complaint/>



Is your information secure?

We take the security of your information very seriously.

We comply with the relevant prevailing legislation which requires us to have in place appropriate security measures at all times, including where we share your information with others.

What additional information do we collect and when?

In addition to the statutory information that we collect, hold and process for the purpose of managing the charity's legal obligations and legitimate interests and affairs we also collect and hold:

- All information you choose to submit to us when you communicate to us by post, e-mail, messaging, or other form of image-based (e.g. photographs), sound-based (e.g. sound files) or text-based communication, whether physical (e.g. ink & paper) or electronic.
- Copies of any notes that we take, whether physical (e.g. ink & paper) or electronic, during verbal communications between us (e.g. telephone; Skype; Hangouts).
- Information on what we communicate to you by post, e-mail, messaging, or other form of image-based or text-based communication whether physical (e.g. ink & paper) or electronic, including information in all ancillary materials (e.g. attachments, images, brochures).

Updates to this policy

The Charity will update this policy from time to time, due to service changes and legislation updates.



Privacy Policy – Clients

It is important to us that you understand and are happy with how we use your information.

Please take time to read this Privacy Notice in full.

1. *Data Subjects*

People like you, who take part in our activities.

2. *The existence of each of your rights*

Under the General Data Protection Regulation you have the following rights:

- a) to be told about what data we have, how and what we use it for, and who we share it with (as we are doing in this Privacy Policy);
- b) to be given access to your personal data;
- c) to have any errors corrected or incomplete data completed;
- d) to stop us using your data if you think our use is unjustified or the data are inaccurate.

3. *What we do with your personal data?*

We use your personal data to help us organise the sort of activities that we think you would like to be involved with, and to keep you informed about those activities. We can do this because we have a legitimate interest in knowing who is participating in our activities and in being able to share with them details of our activities (including any changes) and related activities.

4. *Your right to withdraw consent at any time*

You can tell us that you no longer wish us to use your data in this way and, if you do, we must stop using it as soon as is reasonably practical.

5. *Your right to require the erasure of your data (right to be forgotten)*

If you no longer wish us to have or use your data you can tell us to remove your data completely from our records and we must do so as soon as is reasonably practical.

6. *Who gets to see your personal data?*

We only share your personal data with other people when we are required by law or if you have given consent. Where possible, we will only share anonymised personal data (i.e. so no one can identify who you are).

7. *How long do we keep your personal data?*

We only keep your personal data for funding and analysis. We will keep your data for 6 years, due to funding requirements.

8. *We do not transfer your personal data to other countries*



9. *Your legal obligation*

You are under no legal obligation to give us your personal data if you do not wish to.

10. *The existence of automated decision making, including profiling*

The Charity does not use computers to analyse your data in order to make computer decisions about what communications the charity should, or should not, send to you.

11. *The right to complain to the UK Information Commissioner's Office:*

If you are dissatisfied with the way that the Charity is collecting, holding, processing and using your personal data you are entitled to complain to the Information Commission.

<https://ico.org.uk/make-a-complaint/>

12. *Identity and contact details of the controller.*

The Charity's Data Controller is Chief Executive Officer.

The Controller can be contacted via:

Phone: 07898 138162; Email: info@ownmylifecourse.org