



Military Wives Choirs Foundation (MWCF)

DATA PRIVACY NOTICE

What is this document?

This privacy policy sets out the data processing practices including personal information in electronic and manual form of the Military Wives Choirs Foundation (MWCF).

Who are we?

MWCF is the data controller. This means our organisation decides how your personal data is processed and for what purposes.

Your personal data - what is it?

Personal data relates to information that identifies a living individual. From 25 May 2018, the processing of personal data is governed by the General Data Protection Regulation (GDPR).

How do we process your personal data?

MWCF complies with its obligations under relevant legislation. This means we keep personal data up to date; by storing and destroying it securely. We don't collect or retain excessive amounts of data; we protect personal data from loss, misuse, unauthorised access and disclosure, whilst ensuring that appropriate technical measures are in place to protect personal data.

We use your personal data for the following purposes: -

- To record employees and choir members;
- To enable us to provide a service for the benefit of our choir members, the military community and the public in general;
- To administer supporters' records;
- To fundraise and promote the interests of the charity;
- To maintain our own accounts and records
- To inform you of news, events, activities and services provided by MWCF

What is the legal basis used by MWCF for processing your personal data?

- For employees and volunteers, we use the basis of 'Contract'. This includes the application process.
- For the provision of services to an individual or group, MWCF uses legitimate Interest.
- For the process of fundraising where interest has already been expressed in MWCF, Legitimate Interest is utilised for non-electronic communication, otherwise explicit consent of the data subject is required.
- Where a service is provided by MWCF and sensitive data is required, this is done under the remit for being a not-for-profit body with a political, philosophical, religious or trade union aim. This applies provided: -
 - the processing relates only to choir members or former choir members (or those who have regular contact with it in connection with the not-for-profit purposes); and
 - There is no disclosure to a third party without prior consent.

The use of Cookies

MWCF only uses cookies to determine the pages accessed and files downloaded. This helps us to determine how many people use our website, how many people visit on a regular basis, and how popular our pages are. This information doesn't tell us anything about who you are or

where you live. It simply allows us to monitor and improve our website, as well as the content that we share.

Sharing your personal data

Your personal data will be treated as strictly confidential and will only be shared within MWCF in order to carry out a service or for purposes connected with the charity. We will only share your data with third parties outside of the charity with your prior consent.

How long do we keep your personal data?

We will keep your information only for as long as we need it to provide you with the goods, services or information you have required, to administer your relationship with us, to inform our research or the preferences of our supporters, to comply with the law, or to ensure we do not communicate with people that have asked us not to. When we no longer need information we will always dispose of it securely, using specialist companies if necessary to do this work for us.

Your rights and your personal data used by MWCF

Unless subject to an exemption under legislation, you have the following rights with respect to your personal data: -

- The right to request a copy of your personal data which MWCF holds about you;
- The right to request that MWCF corrects any personal data if it is found to be inaccurate or out of date;
- The right to request your personal data is erased where it is no longer necessary for MWCF to retain such data;
- The right to withdraw your consent to MWCF processing your data at any time
- The right to request that MWCF provide you with your personal data and where possible, to transmit that data directly to another data controller, (known as the right to data portability), [*this only applies where the processing is based on consent or is necessary for the performance of a contract and in either case the data controller processes the data by automated means*].
- The right, where there is a dispute in relation to the accuracy or processing of your personal data, to request a restriction is placed on further processing;
- The right to object to the processing of personal data [*Only applies where processing is based on legitimate interests (or the performance of a task in the public interest/exercise of official authority); direct marketing and processing for the purposes of scientific/historical research and statistics*]
- The right to lodge a complaint with the Information Commissioners Office.

What do we do with the information?

We will use the information you provide to:

- Fulfil your requests - such as applications for employment, choir performances, donations, participation in campaigns and provision of information
- Process your sales transactions, donations, or other payments and verify financial transactions that you complete
- Handle orders, deliver products and communicate with you about orders
- Provide a personalised service to you when you visit our website
- Record any contact we have with you
- Prevent or detect fraud or abuses of our website, as well as enable third parties to carry out technical, logistical or other functions on our behalf
- To carry out research on the demographics, interests and behaviour of our choir members and supporters. This will help us gain a better understanding of different audiences and enable us to improve our service. This research may be carried out

internally by our employees or we may ask another company to do this work for us. Data will be anonymised to protect your data rights for research purposes.

- Communicate with you, as our choir members and supporters, including providing you with information that may be of interest to you.

Sharing your information

We will only share your information if:

- We are legally required to do so, e.g. by a law enforcement agency legitimately exercising a power or if compelled by an order of the Court.
- We believe it is necessary to protect or defend our rights, property or the personal safety of our people and supporters.
- We may work with carefully-selected partners that carry out work on our behalf. These partners may include mailing houses, marketing agencies, IT specialists and research firms. The kind of work we may ask them to do includes processing, packaging, mailing and delivering purchases, answering questions about products or services, sending postal mail, emails and text messages, carrying out research or analysis and processing card payments. We only work with partners we can trust.

We will only pass personal data to partners if they have signed a contract that requires them to:

- Abide by the requirements of all relevant data protection and privacy legislation
- Treat your information as carefully as we would
- Only use the information for the purposes it was supplied (and not for their own purposes or the purposes of any other organisation)
- Allow us to carry out checks to ensure they are doing all these things.

Storing your information

Information is stored by us mainly on computers located in the UK. We may transfer the information between choirs/offices and to other reputable third party organisations as explained above. We may also store information in paper files which are housed securely.

We place a great importance on the security of all personally identifiable information associated with our members and supporters which is only accessed by authorised personnel. We have security measures in place to protect against the loss, misuse and alteration of personal data under our control. We use secure server software (SSC) to encrypt financial and personal information you have shared, before it is sent to us by electronic means. While we cannot ensure or guarantee that loss, misuse or alteration of data will not occur while the data is under our control, we use our best efforts to try to prevent this.

Where you or we have provided a password enabling you to access parts of our websites or use our services, it is your responsibility to keep this password confidential. Please don't share your password with anyone.

Further processing

If we wish to use your personal data for a new purpose, not covered by this Data Privacy Notice, then we will provide you with an update explaining this new use prior to starting any data processing, including setting out the relevant purposes and processing conditions. Where and whenever necessary, we will seek your prior consent to the new data processing.

Contact Details

To exercise all relevant rights, queries or complaints please in the first instance contact the



Data Governance Manager at for MWCF Melanie Nightingale on dgm@militarywiveschoirs.org, or write to:

Military Wives Choirs, Queen Elizabeth House, 4 St Dunstan's Hill, London, EC3R 8AD

You can contact the Information Commissioners Office on 0303 123 1113 or via email <https://ico.org.uk/global/contact-us/email/> or at the Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF.