

# **The Royal Wessex Yeomanry Association**



## **Data protection, privacy and communications policy**

[www.wessexyeomanry.org](http://www.wessexyeomanry.org) is a website operated by The Royal Wessex Yeomanry, within it is an area relevant to The Royal Wessex Yeomanry Association (referred to as RWxY Assn).

We are a registered charity and our registration number is 1162030 in England and Wales. We are a non-profit charitable incorporated organisation (CIO) in the United Kingdom. Our main trading address is Agagia Lines, Allenby Barracks, Bovington Camp, Wareham, BH20 6JA.

RWxY Assn takes the privacy of our beneficiaries, supporters and volunteers very seriously. At RWxY Assn we are strongly committed to protecting your privacy and every reasonable effort is taken to ensure that your information is kept secure and intact. This policy describes how RWxY Assn collects and uses personal information about the people who visit our website and gives us their data over the phone, face-to-face, and in writing. This policy also states how and why we use data, how we store it and how individual personal preferences can be amended.

The terms of this policy may change, so please check it from time to time. This version published on 1<sup>st</sup> February 2021, supersedes all previous versions.

By using the website, you are accepting and consenting to the practices described in this policy. If you have any queries about this policy please contact:

### **The Data Protection Advisor**

The Royal Wessex Yeomanry Association  
Agagia Lines,  
Allenby Barracks  
Bovington Camp  
Wareham  
BH20 6JA

RWxY Assn is not registered with the Office of the Information Commissioner as being a not for profit organization it is exempt.

### **RWxY Assn Privacy Statement**

GDPR provides the legal framework that defines how personal information can be used. RWxY Assn is fully committed to complying with the principles set out in GDPR and has a legal duty to protect any information we collect from you. Please read this privacy policy to understand how we use your data. In summary:

- Only information that we need is collected.
- Your personal information is only used for the purpose for which we collect it.
- Your personal information is only seen by those who need it to do their jobs.
- We will only disclose data when we have your consent, or where we are obliged to disclose personal data by law, or as expressly permitted under the GDPR (through contract; legal obligation, vital interests; public task; or legitimate interests).
- We will keep your information up to date. Inaccurate or misleading data will be corrected as soon as possible.
- Personal information is retained only for as long as it is required for the purpose collected; normally, this will be for a maximum of 6 years if we do not hear from you during this time. Unless there is a legal requirement to do otherwise, at the six year point, we will take steps to remove your information from our records.
- Your information will be protected from unauthorised or accidental disclosure and processed in an appropriate manner to maintain its integrity and confidentiality.
- We will provide you with a copy of your personal information on request (please see below for information on access rights and requests).

These principles apply whether we hold your information on paper or in electronic form.

## **How do we collect information?**

If you provide services to RWxY Assn, we will collect information in line with your contract for services.

We may also collect technical information relating to your use of our website, including your browser type or the Internet Protocol (IP) address used to connect your computer to the internet.

We may also gather general information about the use of our website, such as which pages users visit most often and which services, events or facilities are of most interest. We may also track which pages users visit when they click on links in emails.

We obtain personal information from you when you enquire about our activities – including fundraising and trading – register with us, send or receive an email, make a donation to us, ask a question or otherwise provide us with personal information.

We will only ever collect the information that we need, including data that will be useful to help improve our services. The information is either needed to fulfil your request or to enable us to provide you with a more personalised service. You don't have to disclose any of this information to browse our sites.

## **What information do we collect?**

The personal information we collect might include name, date of birth, email address, postal address and telephone number.

We may also collect special categories of personal data from time to time, but only if this is required for the purpose you have contacted RWxY Assn. We collect special categories of personal data only if we are permitted to do so by data protection law, and we have additional measures in place to protect this data.

We may also record an individual's Regiment or Corps, particularly if still serving. We also gather general non-personal information about the use of our website, such as which pages users visit most often, and which are of most interest. Wherever possible we use aggregated or anonymous information which does not identify individual visitors to our website. Please see the section below on Cookies.

## **Why do we collect this information?**

We collect this information for the purpose of promoting the aims of the Charity and communicating effectively and appropriately with our supporters and, in particular, providing support to our beneficiaries. The lawful basis for which we process your information is:

- your consent;
- processing is necessary for the performance of a contract to which you are a party. If you fail to provide this information we may be unable to perform the contract;
- processing is necessary for compliance with our legal obligations, for example to comply with our obligations as an employer to disclose employee salary details to HMRC;
- processing is necessary to protect your interests or that of another person;
- processing is necessary for the performance of a task carried out in the public interest;
- processing is necessary for the purpose of the legitimate interest pursued by us or a third party, except where your rights as a data subject override our legitimate interest. The legitimate interest we rely upon is subject to a assessment based on the specific context and circumstances.

## **How do we use this information?**

We will use the information you provide in the ways set out below:

- promote the aims of RWxY Assn;
- to provide and pass details to the relevant Squadron antecedent Association, in order for them to carry out their business, of which being a member of the RWxY Assn is also a being de facto member of the Squadron antecedent Association.
- to provide and personalise our services to beneficiaries;
- to communicate with our supporters, dealing with your enquiries and requests, recording any contact with you;

- to provide you with information that you have indicated an interest in, for example information about our campaigns, volunteering, fundraising and trading activities and how you can donate to us;
- we may use this information to personalise the way our website is presented when users visit it, to make improvements to our website and to ensure we provide the best service for users;
- to claim Gift Aid on some donations received;
- to conduct market research;
- Segmentation, so that we can offer supporters information relevant to them;
- for administrative purposes;
- to provide details to the Antecedent Association on discharge from the Reserves or RWxY Assn.

### **Do we share your information with anybody else?**

We share your personal information with our suppliers, who we engage to process data on our behalf. In such cases information is only shared for the purpose of providing services on our behalf relating to communications, or agreements between yourself and RWxY Assn. Such processing is conducted under relevant Data Processing Agreements.

We also may need to disclose your information if required to do so by law or as expressly permitted under applicable data protection legislation.

We do not sell personal details to other charities or other third parties.

Our websites may include links to websites run by other organisations. RWxY Assn is not responsible for the privacy practices of these other websites so you should read their privacy policies carefully before sharing any personal or financial data.

### **Storing and protecting your information**

We recognise the concerns that many people have about giving personal information online.

We place great importance on the security of all personally identifiable information associated with our beneficiaries, supporters, staff and volunteers. We have security measures in place to protect against the loss, misuse and alteration or destruction of personal data under our control. Information is stored by us on computers located in the UK. We may also store information on paper files.

No data transmission over the internet is 100% secure. As a result, whilst we cannot absolutely guarantee that loss, misuse or alteration of data will not occur while it is under our control, we use our best efforts to prevent this and protect your personal information.

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 and tax accounting rules, or to ensure that we do not communicate with people who have asked us not to.

When your information is no longer required, we will always dispose of it securely, in accordance with our retention of records policy.

### **Payment Card Information**

RWxY Assn does not store any sensitive payment card data in our systems.

### **Transfer of Information Outside of the EU**

Given that the Internet is a global environment, using it to collect and process personal data necessarily involves the transmission of data on an international basis. This means for instance that data you pass to us may be processed outside the European Economic Area, although the data will always be held securely and we will take steps to ensure that any third-party organisation we engage to process data on our behalf provides an adequate level of protection in accordance with GDPR. By submitting your personal information, you agree to this transfer, storing or processing at a location outside the EEA.

## **Under 13s**

We will not knowingly request or collect from a child any information online that can be traced to the child, such as an email address, name, or information about the child's family. Unless a parent or guardian consents to such use in advance, we will not knowingly use information that a child provides to us for any fundraising or promotional purpose.

For any raffle and gaming products, due to Gambling Commission regulations, we cannot allow people under the age of 16 to take part.

## **Your Rights**

You have a right to object to RWxY Assn processing your personal information ('right to object') at any time where we rely on our legitimate interests for doing so. Such a request must be sent to the Data Protection Officer at the above address.

You also have a right to object to our processing your data for the purposes of marketing. RWxY Assn always acts upon your choices around what type of communications you want to receive and how you want to receive them. You have a choice about whether you want to receive information about the Charity's work and fundraising activities. We make it easy for you to tell us how you want us to communicate, in a way that suits you. Our forms have clear marketing preference questions; if you don't want to hear from us then that's fine. We will not use your personal information for marketing purposes if you have indicated that you do not wish to be contacted. You can change your marketing preferences for what you receive from us and how, at any time, by contacting Data Protection Officer at the above address.

You have a right to ask us to confirm whether we are processing information about you, and to request access to this information ('right of access'). Please use our form to ensure you supply all the information we need to process your request. We will ask you for proof of your identity before we can act upon your request. To obtain a copy of the personal information we hold about you, please write to us or submit your form to the Data Protection Officer at the above address.

You may ask us, or we may ask you, to rectify information you or we think is inaccurate, and you may also ask us to remove information which is inaccurate or complete information which is incomplete ('right to rectification'). If you inform us that your personal data is inaccurate, we will inform relevant third parties with whom we have shared your data so they may update their own records. If your personal details change, please help us to keep your information up to date by notifying us at the address below the Data Protection Officer at the above address.

You have a right to obtain your personal data from us and reuse it for your own purposes, perhaps for another service, without hindering the usability of the data ('right of portability'). This right does not apply where processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in us.

You have a right to seek the erasure of your data (often referred to as the 'right to be forgotten'). You may wish to exercise this right for any reason, for example where it is no longer necessary for us to continue holding or processing your personal data you may withdraw your consent. You should note that we are entitled to and reserve the right to retain your data for statistical purposes. This right is not absolute, as we may need to continue processing this information, for example, to comply with our legal obligations, or for reasons of public interest.

You have a right to ask us to restrict our processing of your information ('right to restriction') if:

- you contest its accuracy and we need to verify whether it is accurate
- the processing is unlawful and you ask us to restrict use of it instead of erasing it
- we no longer need the information for the purpose of processing, but you need it to establish or defend legal claims
- you have objected to processing of your information being necessary for the performance of a task carried out in the public interest, or for the purposes of our legitimate interests. The restriction would apply while we carry out a balancing act between your rights and our legitimate interests.
- you exercise your right to restrict processing, we would still need to process your information for the purpose of exercising or defending legal claims, protecting the rights of another person or for public interest reasons.

If you would like to exercise any of your rights above, please contact the Data Protection Officer at the address above, unless we have provided specific contact details in respect of one of the rights we have set out. We will act in accordance with your instructions as soon as reasonably possible and there will be no charge.

You have a right to report any of your concerns about our use of your data to the Information Commissioner's Office. You may do so by calling their helpline at 0303 123 1113.

## **Cookie Usage**

RWxY Assn website uses cookies, tracking pixels and related technologies. Cookies are small data files that are served by our platform and stored on your device. Our site uses cookies dropped by us or third parties for a variety of purposes including to operate and personalise the website and to ensure you see content that is relevant to you. Cookies help us to provide you with a better experience by allowing us to understand what areas of the website are of interest to our visitors (e.g. via Google analytics).

Most browsers will allow you to turn off cookies. Please note however that turning off cookies will restrict your use of our website. To learn more about cookies and how to manage them, visit [AboutCookies.org](http://AboutCookies.org).

When you first visit our site, you are given the option to opt-out of cookies but please be aware that this may negatively impact on your ability to view and use content on our website.

## **Trademarks and copyright**

RWxY Assn website contains material which is protected by copyright and/or other intellectual property rights. All copyright and intellectual property rights including the names, images and logos are owned by RWxY Assn unless otherwise stated. All rights are reserved.

You are responsible for complying with all applicable copyright laws. We permit you to make copies of information on RWxY Assn website as necessary incidental acts during your viewing and you may take a print for your personal use of so much of the site as is reasonable for private purposes. All other uses are prohibited. Nothing in these terms shall be construed as conferring any right to use any trademark, logo, patent right or copyright of RWxY Assn.

## **Changes**

We may change the terms of this privacy statement on occasion, but will not reduce your rights under this Privacy Policy without your explicit consent. We will also keep prior versions of this Privacy Policy in an archive. By continuing to use our websites you will be deemed to have accepted such changes.

If you have any questions about this policy or how we use data please contact the Data Protection Officer at the above address.

## **Data Protection Regulator**

Further information and advice about data protection is available from:

The Office of the Information Commissioner  
Wycliffe House  
Water Lane  
Wilmslow  
Cheshire SK9 5AF  
Tel: +44 (0) 01625 545 745      Website: [www.ico.org.uk](http://www.ico.org.uk)

## **Fundraising Preference Service**

RWxY Assn is committed to empowering our supporters to manage their information. The Fundraising Preference Service (FPS) enables donors to take control of their charitable giving and conversations; and we want to help you use the service effectively.

RWxY Assn supports the Fundraising Regulator and its efforts to develop the Fundraising Preference Service as a means of rebuilding trust between charities and the public. The Charity is committed to upholding fundraising best practice and being as transparent as possible with our donors.