

# Privacy Notice

## Purpose

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This privacy notice is for Women's Aid Federation of England

It tells you what we do with your personal data, the lawful bases we use for our processing, how long we keep it, and your rights as an individual.

Wherever possible Women's Aid Federation of England will only collect, process and store information about you that you have willingly provided. We aim to be open about collecting information and clear about what we will use it for.

## About Us

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Women's Aid is a grassroots federation working together to provide life-saving services in England and build a future where domestic abuse is not tolerated.

## Why we collect information about you and how we ensure that what we do with it is lawful

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If anyone can be identified by any information that we collect, this information is called 'personal data'. Data protection law says that Women's Aid must have a reason or 'purpose' for collecting and using personal data.

We cannot use your personal data for any reason unless we have a lawful basis to do so.

This information is detailed in the table below.

Our Purposes	The Lawful Bases That We Use
Campaign to introduce laws to benefit survivors or change existing laws, and seek to influence others to do this.	<ul style="list-style-type: none"><li>The data subject has given consent to the processing;</li><li>The processing is necessary for the purposes of legitimate interests pursued by the data controller or by the third party or parties to whom the data are disclosed, except where the processing is unwarranted in any particular case by reason of prejudice to the rights and freedoms or legitimate interests of the data subject</li></ul>
Conduct research projects, support research in universities and publish data on key issues to ensure that we are leading the way in evidence and data on domestic abuse.	<ul style="list-style-type: none"><li>The data subject has given consent to the processing.</li><li>The processing is necessary for the purposes of legitimate interests pursued by the data controller or by the third party or parties to whom the data are disclosed, except where the processing is unwarranted in any particular case by reason of prejudice to the rights and freedoms or legitimate interests of the data subject</li></ul>
Run public awareness raising campaigns to	<ul style="list-style-type: none"><li>The processing is necessary for the purposes of legitimate interests pursued by the data controller or by the third party or parties to whom the data are</li></ul>

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show that domestic abuse is a major social issue with a devastating impact.	disclosed, except where the processing is unwarranted in any particular case by reason of prejudice to the rights and freedoms or legitimate interests of the data subject
Provide training that enables organisations to tackle and prevent domestic abuse.	<ul style="list-style-type: none"> <li>The processing is necessary - for the performance of a contract to which the data subject is a party, or for the taking of steps at the request of the data subject with a view to entering into a contract</li> </ul>
Maintain and increase our membership base for individuals and organisations, enabling us to use our expertise, knowledge and influence to raise the status of women to a level where violence against them is no longer legitimised or tolerated.	<ul style="list-style-type: none"> <li>The data subject has given consent to the processing;</li> <li>The processing is necessary for the purposes of legitimate interests pursued by the data controller or by the third party or parties to whom the data are disclosed, except where the processing is unwarranted in any particular case by reason of prejudice to the rights and freedoms or legitimate interests of the data subject;</li> <li>The processing is necessary- for the performance of a contract to which the data subject is a party, or for the taking of steps at the request of the data subject with a view to entering into a contract;</li> </ul>
Work with other organisations to enable joint commissioning across specialist services in the Violence against Women and Girls sector (VAWG), both nationally and locally.	<ul style="list-style-type: none"> <li>The processing is necessary- for the performance of a contract to which the data subject is a party, or for the taking of steps at the request of the data subject with a view to entering into a contract</li> </ul>
Organise conferences and events.	<ul style="list-style-type: none"> <li>The processing is necessary- for the performance of a contract to which the data subject is a party, or for the taking of steps at the request of the data subject with a view to entering into a contract;</li> </ul>
Support events organised by member organisations with follow-up information and information about related activities.	<ul style="list-style-type: none"> <li>The processing is necessary for the purposes of legitimate interests pursued by the data controller or by the third party or parties to whom the data are disclosed, except where the processing is unwarranted in any particular case by reason of prejudice to the rights and freedoms or legitimate interests of the data subject</li> </ul>
Managing legacy income	<ul style="list-style-type: none"> <li>The processing is necessary - for the performance of a contract to which the data subject is a party, or for the taking of steps at the request of the data subject with a view to entering into a contract</li> <li>The processing is necessary for compliance with any legal obligations to which the data controller is subject, other than an obligation imposed by contract</li> </ul>
Manage your engagement with us,	<ul style="list-style-type: none"> <li>The processing is necessary for compliance with any legal obligations to which the data controller is subject, other than an obligation imposed by contract;</li> </ul>

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such as processing your donation and telling you what we do with the support we receive.	<ul style="list-style-type: none"><li>• The processing is necessary for the purposes of legitimate interests pursued by the data controller or by the third party or parties to whom the data are disclosed, except where the processing is unwarranted in any particular case by reason of prejudice to the rights and freedoms or legitimate interests of the data subject</li></ul>
Keep internal records.	<ul style="list-style-type: none"><li>• The processing is necessary for compliance with any legal obligations to which the data controller is subject, other than an obligation imposed by contract</li></ul>
Send promotional emails about campaigns, courses or other information.	<ul style="list-style-type: none"><li>• The data subject has given consent to the processing.</li><li>• The processing is necessary for the purposes of legitimate interests pursued by the data controller or by the third party or parties to whom the data are disclosed, except where the processing is unwarranted in any particular case by reason of prejudice to the rights and freedoms or legitimate interests of the data subject</li></ul>
Facilitate our members to gain access to physical donations, grants, partnership and referral pathways	<ul style="list-style-type: none"><li>• The data subject has given consent to the processing.</li><li>• The processing is necessary for the purposes of legitimate interests pursued by the data controller or by the third party or parties to whom the data are disclosed, except where the processing is unwarranted in any particular case by reason of prejudice to the rights and freedoms or legitimate interests of the data subject</li></ul>
Support survivors to make complaints against member services	<ul style="list-style-type: none"><li>• The data subject has given consent to the processing.</li><li>• The processing is necessary for the purposes of legitimate interests pursued by the data controller or by the third party or parties to whom the data are disclosed, except where the processing is unwarranted in any particular case by reason of prejudice to the rights and freedoms or legitimate interests of the data subject</li></ul>
Holding new membership applications (organisations) on file	<ul style="list-style-type: none"><li>• The data subject has given consent to the processing.</li><li>• The processing is necessary for the purposes of legitimate interests pursued by the data controller or by the third party or parties to whom the data are disclosed, except where the processing is unwarranted in any particular case by reason of prejudice to the rights and freedoms or legitimate interests of the data subject</li></ul>

## Special Category Personal Data

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This includes information about race, ethnic origin, religion, health, sex life and sexual orientation.

These types of personal data merit specific protection. This is because use of this data could create significant risks to the individual's fundamental rights and freedoms.

The presumption is that this type of data needs to be treated with greater care because collecting and using it is more likely to interfere with these fundamental rights or open someone up to discrimination.

Where we process Special Category Data we do so because:

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The data subject has given explicit consent to the processing of the personal data for one or more specified purposes. We would inform you of our legitimate interests concerning this data when we collect it.

If you give consent, you have the right to withdraw this at any time by contacting us in writing using the address or contact details given in this privacy notice.

If you disagree with us using your personal data for one or more of our legitimate interests let us know in writing and we will stop using it for that purpose.

## Safety of personal data

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In order to prevent unauthorised access or disclosure we have effective physical, electronic and managerial procedures to safeguard and secure the information we hold about you.

We keep information about you safe and secure by using electronic databases which are password protected systems, accessed only by staff who have been sufficiently trained data protection and who are bound by our organisational policies (i.e. Data Protection Policy, IT Policy) and procedures. Any paper copies are kept securely in locked drawers/cupboards.

If you have provided information on paper, it may be transferred to an electronic database.

All information you provide to us is stored on secure servers and any cloud-based systems are located within the European Economic Area (EEA).

### ***Transferring personal data outside the European Economic Area***

If we do transfer information outside the EEA, we will make sure that it is protected in the same way as if it was being used in the EEA. To do this we will use one or more of these safeguards:

- Only transfer it to a non-EEA country with privacy laws that give the same protection as the EEA as specified by the European Commission and which has been determined as adequate by the EEA;
- Ensure that a contract with the recipient (data processor) is in place that means that they must protect it to the same standards as the EEA.

You can find out more about these safeguards on the European Commission Justice and ICO websites.

## How long do we keep your information?

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We keep contact details for supporters with whom we have/have had a working relationship and for organisations or individuals who contact us, for six years after the last contact.

For more details see our Retention Schedule.

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## Sharing Your Personal Information

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We will not sell, distribute, share or lease your personal data with/to third parties unless we are required to do so by law, have a safeguarding concern or we are using other companies' services. Women's Aid Federation of England does not share your personal information with any third parties, other than those listed below.

Any company whose services we use in this way is required to treat your data as carefully as we do and use it only in the course of the work they are doing for us.

Third parties who may provide an element of a service for us are classed as data processors. They will not share your data with any organisation other than us. They will hold it securely and retain it for the period we instruct them to. (See retention schedule)

<b>Name of company/organisation</b>	<b>The service they perform for us, or their function</b>
Microsoft	IT hosting
Third Sector	IT/Website maintenance
Impact Stack	Funding/campaigning platform
Shred-it Byte-Back	Confidential waste disposal
Quality Assessment Panels (individual women from SWA, Imkaan et al)	Award NQS to members
WorldPay	Banking
Access Group - Rapidata	Banking
Zettle	Banking
Stripe	Banking
MailChimp	Communication platform
Blackbaud Merchant Services –Raiser's Edge Access Group - ThankQ	Customer Relationship Management Database
Charities Aid Foundation	Funding Platform/Banking
Imkaan Cadence Partners GDPR charity solutions	Consultants

\*Please be aware that these organizations are data controllers in their own right and we encourage you to read their privacy notices

There are also fundraising websites from whom we may also receive your personal information.

We will never sell or distribute your personal information to any other third parties or make it public unless we have a legal obligation to do so.

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Where we provide links to websites of other organisations, this privacy notice does not cover how that organisation processes personal information. We encourage you to read the privacy notices on the other websites you visit.

## Your Rights

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Under data protection law, you have rights we need to make you aware of. The rights available to you depend on our reason for processing your information.

### *Your right of access*

You have the right to ask us for copies of your personal information. This right always applies. There are some exemptions, which means you may not always receive all the information we process.

### *Your right to rectification*

You have the right to ask us to rectify information you think is inaccurate. You also have the right to ask us to complete information you think is incomplete. This right always applies.

### *Your right to erasure*

You have the right to ask us to erase your personal information in certain circumstances.

### *Your right to restriction of processing*

You have the right to ask us to restrict the processing of your information in certain circumstances.

### *Your right to object to processing*

You have the right to object to processing if we are able to process your information because it is in our legitimate interests, for statistical purposes or direct marketing purposes.

### *Your right to data portability*

This only applies to information you have given us. You have the right to ask that we transfer the information you gave us from one organisation to another, or give it to you. The right only applies if we are processing information based on your consent for contractual purposes.

Your right in relation to automated decision making and profiling. Women's Aid Federation of England does not use any of your personal data to make automated decisions, however we do create profiles of our clients/customers. You have the right to stop us doing this and can do so by contacting us in writing at the address given.

You are not required to pay any charge for exercising your rights. We have one month to respond to you.

For more information about your rights, you can visit the ICO website <https://ico.org.uk>

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## How to complain

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If you are unhappy about the way we handle your personal data please let us know verbally or in writing by contacting us at the address given below.

We will explain how we have processed your personal information and if we have made a mistake will tell you how we will put this right.

If you are still dissatisfied, you may report your concern to the Information Commissioner's Office (ICO) by contacting:

Wycliffe House, Water Lane, Wilmslow SK9 5AF

Tel. 0303 123 1113

## Contacting us

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If you have any questions about this Privacy Notice, the practices of our website, or your dealings with the site, please contact us at:

[GDPR@womensaid.org.uk](mailto:GDPR@womensaid.org.uk)

PO Box 3245, Bristol, BS2 2EH