Women in Defence UK Privacy Policy

Women in Defence UK is firmly committed to maintaining the privacy and security of personal data of its partners, supporters and other parties the organisations interact with. This privacy notice will inform you as to how we look after your personal data, tell you about your privacy rights and how the law protects you.

This privacy notice is provided in a layered format so you can click through to the specific areas set out below. Please also use the glossary to understand the meaning of some of the terms used in this privacy notice.

1. IMPORTANT INFORMATION AND WHO WE ARE
2. THE DATA WE COLLECT ABOUT YOU
3. HOW IS YOUR PERSONAL DATA COLLECTED
4. HOW WE USE YOUR PERSONAL DATA
5. DISCLOSURES OF YOUR PERSONAL DATA
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Important information and who we are

Purpose of this privacy notice

This privacy notice aims to give you information on how Women in Defence UK collects and processes your personal data in general and through your use of the Women in Defence UK website. This includes any data you may provide through our website when you sign up to join the mailing list or take part in the annual awards ceremonies.

It is important that you read this privacy notice together with any other privacy notice or fair processing notice we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This privacy notice supplements the other notices and is not intended to override them. This website is not intended for children and we do not knowingly collect data relating to children.

Controller

Women in Defence UK is operated by PA Consulting Group Limited (referred to as "PA", "we", "us" or "our" in this privacy notice). PA is the controller and is responsible for your personal data.

We have appointed a data privacy manager who is responsible for overseeing questions in relation to this privacy notice. If you have any questions about this privacy notice, including any requests to exercise your legal rights, please contact the data privacy manager using the details set out below.

Contact details

Our full details are: Women in Defence UK
Data privacy manager: Angela Owen
Email address: info@womenindefenceuk.com or privacy@paconsulting.com

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues (www.ico.org.uk). We would,
however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

Changes to the privacy notice and your duty to inform us of changes

This version was last updated on 26th February 2020 and historic versions can be obtained by contacting us.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

Third-party links

The Women in Defence UK website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy notice of every website you visit.

The data we collect about you

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We may collect, use or store different kinds of personal data about you which we have grouped together as follows:

- ‘Identity data’ includes first name, maiden name, last name and title.
- ‘Contact data’ includes address, email address and telephone numbers.
- ‘Technical data’ includes internet protocol (IP) address browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access this website.
- ‘Usage data’ includes information about how you use our website.

We collect, use and share ‘aggregated data’ such as statistical or demographic data for any purpose. ‘Aggregated data’ may be derived from your personal data but is not considered personal data in law as this data does not directly or indirectly reveal your identity. For example, we may aggregate your ‘usage data’ to calculate the percentage of users accessing a specific website feature. However, if we combine or connect ‘aggregated data’ with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy notice.

We collect special categories of personal data about you relating to dietary requirements and accessibility requirements for the purpose of running events. This data is deleted after the event. We do not collect any another special categories of personal data (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data). Nor do we collect any information about criminal convictions and offences.

How is your personal data collected?

We use different methods to collect data from and about you including through:
• Direct interactions. You may give us your identity and contact data by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:

  • Subscribe to the Women in Defence UK mailing list
  • Enter the Women in Defence UK annual awards ceremony
  • Give us feedback.

• Automated technologies or interactions. As you interact with our website, we may automatically collect ‘technical data’ about your equipment, browsing actions and patterns. We collect this personal data by using cookies, server logs, or other similar technologies. Please see our cookie policy at the end of this document for further details.

• Third parties or publicly available sources. We may receive personal data about you from third parties as set out below:

  • Identity and ‘contact data’ from individuals that may nominate you for the Women in Defence UK annual awards ceremony.

How we use your personal data

We will only use your personal data when the law allows us to. We will use your personal data where it is necessary for our legitimate interests in contacting you regarding Women in Defence UK awards processes, ceremonies and related activities.

Generally, we do not rely on consent as a legal basis for processing your personal data. You have the right to withdraw consent to marketing at any time by contacting us, or by clicking on the unsubscribe link in any of the emails we send to you.

Purposes for which we will use your personal data

We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

<table>
<thead>
<tr>
<th>Purpose/Activity</th>
<th>Type of data</th>
<th>Lawful basis for processing including basis of legitimate interest</th>
<th>Retention Period</th>
</tr>
</thead>
<tbody>
<tr>
<td>To register you on our mailing list</td>
<td>(a) Identity</td>
<td>Consent or Legitimate interests.</td>
<td>Data is held whilst you are subscribed to our emails, and to maintain a ‘stop list’ of people who have unsubscribed from our data.</td>
</tr>
<tr>
<td></td>
<td>(b) Contact</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Purpose/Activity</td>
<td>Type of data</td>
<td>Lawful basis for processing including basis of legitimate interest</td>
<td>Retention Period</td>
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<td>-----------------</td>
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</tr>
<tr>
<td>To manage our relationship with you which will include: (a) Notifying you about changes to our terms or privacy policy (b) Asking you to leave a review or take a survey</td>
<td>(a) Identity (b) Contact (c) Profile (d) Marketing and Communications</td>
<td>Legitimate interests (to keep our records updated and to study how customers use our products/services)</td>
<td>Data is held whilst you are subscribed to our emails, and to maintain a ‘stop list’ of people who have unsubscribed from our data.</td>
</tr>
<tr>
<td>To enable you to partake in the Women in Defence UK annual awards ceremony and related activities.</td>
<td>(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications</td>
<td>Legitimate interests (to study how to develop and grow our Women in Defence UK initiative)</td>
<td>Data is kept for 3 years and then deleted</td>
</tr>
<tr>
<td>To administer and protect Women in Defence UK and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)</td>
<td>(a) Identity (b) Contact (c) Technical</td>
<td>(a) Necessary for our legitimate interests (for running our initiative, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise)</td>
<td>Data is held whilst you are subscribed to our emails, and to maintain a ‘stop list’ of people who have unsubscribed from our data.</td>
</tr>
<tr>
<td>To use data analytics to improve our website.</td>
<td>(a) Technical (b) Usage</td>
<td>Necessary for our legitimate interests (to keep our website updated and relevant)</td>
<td>Data is kept for 7 years and then deleted</td>
</tr>
</tbody>
</table>

**Opting out**

You can ask us to stop sending you messages at any time by contacting us at any time, or by clicking on the unsubscribe link in any of the emails we send to you.

**Cookies**

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly. For more information about the cookies we use, please see the section at the end of this document.

**Change of purpose**
We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

**Disclosures of your personal data**

We may have to share your personal data with the parties set out below for the purposes set out in the table in the section ‘purposes for which we will use your personal data’.

- Internal third parties as set out in the glossary.
- External third parties as set out in the glossary.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

**International transfers**

We do not transfer your personal data outside the United Kingdom or the European Economic Area (EEA).

**Data security**

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions, and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

**Data retention**

**How long will you use my personal data for?**

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data
and whether we can achieve those purposes through other means, and the applicable legal requirements.

Data and records will not be kept for longer than is necessary, as the table above sets out. In the UK the ‘default’ retention period is seven years after the information was first archived. No data record should be retained for more than the relevant data retention period after it is first archived unless a good reason can be demonstrated. Women in Defence UK may retain the information for the following reasons:

- Historical anonymous Comparison data, for example, finance where records may be maintained for the purpose of retrospective comparison
- Other legitimate business reasons, anonymised data comingled from various jurisdictions.

All personal data will be securely destroyed in accordance with our Data Retention Policy.

Your legal rights

Under certain circumstances, you have rights under data protection laws in relation to your personal data. Please click on the links below to find out more about these rights:

- Request access to your personal data.
- Request correction of your personal data.
- Request transfer of your personal data.
- Right to withdraw consent or unsubscribe from our marketing messages.

If you wish to exercise any of the rights set out above, please contact us.

No fee usually required

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

What we may need from you

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

Time limit to respond

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

Glossary

Basic Terms
Data is information which is stored electronically, on a computer, or in certain paper-based filing systems.

Data subjects for the purpose of this policy include all living individuals about whom we hold personal data.

Personal data means data relating to a living individual (data subject) who can be identified from that data (or from that data and other information in our possession). Personal Data can be factual (for example, a name, address, date of birth, identification number, location data, an online identifier) or one or more factors specific to that person, their actions, genetic material, mental health, economic status, cultural or social identity.

Processing is any activity that involves use of the data whether or not by automated means. It includes obtaining, recording or holding the data, or carrying out any operation or set of operations on the data including: organising, amending, retrieving, using (adaptation or alteration), disclosing, erasing or destroying it. Processing also includes transferring personal data to third parties.

Special Categories of Personal data includes, information about a person's racial or ethnic origin, political opinions, religious or similar beliefs, trade union membership, physical or mental health or condition or sexual life, or about the commission of, or proceedings for, any offence committed or alleged to have been committed by that person, the disposal of such proceedings or the sentence of any court in such proceedings. Sensitive personal data can only be processed under strict conditions, including a condition requiring the express permission of the person concerned.

Lawful Basis

Legitimate Interest means the interest of our business in conducting and managing Women in Defence UK. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by contacting us.

Performance of Contract means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.

Comply with a legal or regulatory obligation means processing your personal data where it is necessary for compliance with a legal or regulatory obligation that we are subject to.

Internal Third Parties
Employees of PA Consulting and who provide IT and system administration services.

External Third Parties
Service providers who provide IT and system administration services. Suppliers to Women in Defence UK, including collateral designers and printers.

Your Legal Rights

You have the right to:
**Request access** to your personal data (commonly known as a ‘data subject access request’). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.

**Request correction** of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.

**Request the transfer** of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

**Withdraw consent at any time** where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

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**Women in Defence UK Cookie Policy**

**What are 'cookies'?'**

'Cookies' are small text files that are stored by the browser on your computer or mobile phone. They are widely used in order to make websites work, or work more efficiently, as well as to provide information to the owners of the site.

Websites are able to read from and write to these files, allowing them to recognise user preferences or return visitors. Cookies are the tools that give websites a sense of memory, allowing them to recognise one user's website visit from another. For example, this site uses cookies to count the number of visitors to our site.

Each web domain can only access cookies stored by that specific web domain, meaning that only the womenindefenceuk.com servers can access the cookies set by the womenindefenceuk.com domain. These cookies are called first party cookies. Third party cookies are cookies set by third-party websites.

Note that cookies are not software, they are not programs, they cannot carry viruses and they cannot install any kind of malware on the host computer.

The data collected within these cookies are anonymised data based on IP addresses and do not contain any individual information.

**Use of cookies on this site.**

Some cookies used on womenindefenceuk.com are technically necessary for the web site to operate.

We use other cookies for website optimisation. Some of them are analytical cookies and allow us to understand how our web site performs: we can count the number of visitors, know how effective our content is and improve how our web site works. We use this information anonymously for statistical purposes.
Please contact us if you want more information on what cookies we use and how.

**How to opt-out from cookies in your browser**

All modern browsers allow you to change your cookie settings. These settings will typically be found in the 'options' or 'preferences' menu of your browser. In order to understand these settings, this link may be helpful, otherwise you should use the 'Help' option in your browser for more details.

**Useful links**

If you would like to find out more about cookies and their use on the Internet, you may find this link useful.