

# **Windsor Fellowship Privacy Statement**

This Privacy Policy applies to information we collect about you through the Website and when you otherwise communicate with us.

### **Data Protection**

The Windsor Fellowship (WF) is a registered charity (no. 1089681, registered company no. 4271633). Our work supports young people navigate pathways to educational and career success and become confident, active role model citizens.

At the WF we take your privacy seriously, are committed to protecting your personal information and adhere to the General Data Protection Regulation (GDPR) May 2018. We endeavour to ensure that your personal data will be processed in accordance with the GDPR and that:

- it will be processed fairly and lawfully
- it will be obtained only for one or more specified and lawful purposes, and shall not be further processed in any manner incompatible with that purpose or those purposes
- it will be adequate, relevant and not excessive in relation to the purpose(s) for which they are processed
- it will be accurate and, where necessary, kept up to date
- it will not be kept for longer than is necessary for that purpose or those purposes in line with our data retention policy
- it will be processed in accordance with the rights of data subjects under this regulation
- technical and organisational measures shall be taken against unauthorised or unlawful processing of personal data and against accidental loss or destruction of, or damage to, personal data.

#### **Data collection**

The WF may collect the following data:

Information about you

We may collect personal information from you when you:

- enquire about the website, our services, opportunities and/or about the WF
- share your information through the website
- Apply for any of our programmes through the website
- register for any of our mailing lists or events
- contact us through the website, email, or any other channel including social media.

This personal information may include but is not limited to the following information about you:

- Identity data: First name, maiden name, last name, username or similar identifier, title, date of birth and gender; home address, email address and telephone numbers;
- Programme data: feedback and survey responses;
- Financial data: such as income and outgoings for scholarship purposes
- Sensitive data:, which includes details about your race or ethnicity, religious or philosophical beliefs, sexual orientation, disability information, access details and about your health.
- Video footage and photos of you.

We may also ask for or collect some non-personal information from you.

### How do we use this information?

Your personal information will only be used by us to:

- process your requests
- respond to your questions or comments
- provide or administer activities relating to The WF's services or the services offered on the website, including relevant opportunities
- provide you with information relating to the WF, the website or our services, or that we feel may be of interest to you
- maintain our organisational records in accordance with our data protection and retention policies
- carry out anonymised or pseudonymised research, including evaluation carried out for us by another organisation or to prepare reports.

We will only use your personal data when the law permits. Most commonly, we will use your personal data in the following circumstances:

- where we need to perform any contractually defined activities between us reliant at least in part upon that data;
- where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests; and
- where we need to comply with a legal or regulatory obligation

## Who will we share your data with?

The WF will not distribute or pass your personal information to third parties unless we have your consent or are required by law to do so. You may request details of personal information which we hold about you under the GDPR.

We will share your data when you specifically request us to do this, such as when you submit information to enquire about jobs or submit an application through the Website.



Even if you have accepted the processing of your personal data for marketing purposes (by ticking the relevant box), you have the right, under certain circumstances, to:

- Request access to your personal data
- Request correction of your personal data
- Reguest restriction of processing your personal data
- Request transfer of your personal data
- Right to withdraw consent
- Right to change your data preferences, including opting out of any communications
- Request erasure of your personal data
- Object to processing of your personal data

### You can contact us at:

Windsor Fellowship

CAN Mezzaine, 49-51 East Road, London N1 6AH

T: 020 7250 8444

E: office@windsor-fellowship.org

W: https://www.windsor-fellowship.org

The WF will provide you with a timely response in line with GDPR.

# **Legal basis for using your information**

In most cases, we will only use your personal information where we have your consent or because we need to use it in order to fulfil a request from you (for example, because you have registered your interest in a fundraising event or want to hear about work opportunities).

However, there are other lawful reasons that allow us to process your personal information and one of those is called 'legitimate interests'. This means that the reason that we are processing information is because there is a legitimate interest for the WF to process your information.

Whenever we process your personal information under the 'legitimate interest' lawful basis we make sure that we take into account your rights and interests and will not process your personal information if we feel that there is an imbalance.

Some examples of where we have a legitimate interest to process your personal information are where we use your personal information for data analytics, conducting research to better understand who our beneficiaries and supporters are, improving our services, for our legal purposes (for example, dealing with complaints and claims), or for complying with guidance from the Charity Commission.

#### **Security**

The WF uses the Wufoo.com (SurveyMonkey.com) and Microsoft OneDrive for Business for receiving and storing your data. These organisations provide high levels



of security and protection. Wufoo.com (SurveyMonkey.com) servers are based in the United States they are certified under and comply with both the EU-US and Swiss-US Privacy Shield programs (privacyshield.gov), which legalize the collection, use, transfer, and retention of personal data from Europe to the US. You can find out more about Wufoo.com (SurveyMonkey.com) position on security <a href="here">here</a> and Microsoft One Drive for Business <a href="here">here</a>.

## **Your rights and more information**

If you have any questions about how the WF handles your personal information, processes your information or you wish to find out about your rights please contact our Data Protection Officer (MahoneyK@windsor-fellowship.org)

If you raise a concern with the WF about the way it has handled your personal data and you are dissatisfied with the WF's response, you are entitled to raise a concern with the Information Commissioner's Office (ICO) at: <a href="https://ico.org.uk/concerns/">https://ico.org.uk/concerns/</a>.