

Privacy Notice: Membership Data

Version Number	Date of Issue	Department	Owner
0.6	22/01/2019	Marketing, Membership and Income Growth	Senior Data Protection Officer / Head of Volunteering

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1. Policy

The WEA Data Protection Policy states:

*In order to be fair and transparent about our processing activities, the WEA provides individuals with clear information about how we process their personal data. This information is referred to as a **privacy notice**.*

Privacy notices are made available to data subjects at the point of data collection, whether this is via a website, a paper form or over the telephone. The WEA will take steps to ensure this information is concise, transparent, intelligible and easily accessible form, using clear and plain language.

All WEA Privacy Notices include:

- *The controller's identity and contact details;*
- *The Data Protection Officer's contact details;*
- *What personal data is processed;*
- *The purposes of the processing;*
- *The lawful basis for the processing;*
- *Who the personal data will be shared with;*
- *Details of any international transfers of personal data;*
- *The period for which personal data will be stored;*
- *Details of any automated decision-making using the personal data;*
- *Details of the data subject's rights and how they can exercise these;*
- *Details of how to complain to the Information Commissioners Office if unsatisfied.*

2. Purpose

This privacy notice is intended to describe how the WEA collects, uses, shares and retains your personal information and informs you about your choices regarding use, access and correction of your personal information. The WEA is committed to ensuring that any personal information it receives is secured and handled in accordance with the General Data Protection Regulation and the Data Protection Act 2018.

3. Who collects my personal data?

Your personal data is collected in England and Scotland by the Workers' Educational Association (WEA), a charity registered in England and Wales (no. 1112775) and in Scotland (no. SC039239).

Address: 4 Luke Street, London, EC2A 4XW
Tel: 0300 303 3464
Email: supportservices@wea.org.uk
Website: wea.org.uk

4. Contact details for the WEA Data Protection Officer

Tel: 0300 303 3464
Email: dataprotection@wea.org.uk
Address: 10B, Josephs Well, Hanover Walk, Leeds, LS3 1AB

5. What personal data does the WEA process?

The list below outlines the maximum extent of the member personal data we process:

Title, first name, surname, address, telephone number, mobile number, email address, date of birth, sex, ethnicity (special category), bank details, credit / debit card details (collected and controlled via WorldPay).

6. What does the WEA use my personal data for?

The WEA collects and processes your personal data for the following purposes:

Processing your membership including payments and renewals - we may use your personal information to check your details are correct, share our privacy information, establish if you are entitled to free membership, collect your membership fees either as a one off card payment (via WorldPay) or direct debit, and ask if you are interested in renewing your membership.

Setting you up with an exclusive members' online account – we may use your personal information to create and send you the details of your online account. We may also need to contact you about changes to your account, scheduled maintenance, or other account related issues. The WEA will never ask you for your account log in details with the exception of your membership number.

Setting you up with an account on our e-learning platform – we may use your personal information to create and send you the details of a user account for our e-learning platform (Canvas) and it's supporting systems, so that you can access WEA learning opportunities aimed specifically at our members. (As part of this process you may be required to agree to the additional terms and conditions required by the e-learning platform). The privacy information for the Canvas system is available from instructure.com/policies/intl-privacy

We may also need to contact you about changes to your user account, scheduled maintenance, or other user account related issues. The WEA will never ask you for your account log in details.

Providing you with a WEA membership card – As part of our membership offer, we will use your personal information to send you a WEA membership card in the post. We may also need to contact you in relation to your membership card.

Sending you a monthly member newsletter and member updates – We will use your personal information to send you our monthly member newsletter. We may also send you additional communications in order to keep you updated about key WEA issues / activities / WEA updates.

Sending you our Highway Magazine – We will use your personal information to send you our members' magazine 'The Highway'.

Letting you know about membership events like AGM's and our National Conference – As WEA members you are entitled to attend membership events and vote at local Annual General Meetings (AGM's) and our National Conference. As part of this commitment to democracy for our members, the WEA may use your personal data to send you information about these membership events.

Producing anonymous statistics – As a membership organisation we will use some of the personal data we collect to produce anonymous statistics on our membership and volunteers for use in publicity, funding bids and as part of educational campaigning activities.

7. What lawful basis does the WEA use for collecting my personal data?

The lawful basis used by the WEA for the collection of member personal data under article 6 of the GDPR is:

*6 (b) The processing is necessary for a **contract** you have with the individual, or because they have asked you to take specific steps before entering into a contract.*

The lawful basis used by the WEA for the collection of member special category personal data under article 9 of the GDPR is:

9 (2) (d): Processing is carried out in the course of its legitimate activities with appropriate safeguards by a foundation, association or any other not-for-profit body with a political, philosophical, religious or trade union aim and on condition that the processing relates solely to the members or to former members of the body or to persons who have regular contact with it in connection with its purposes and that the personal data are not disclosed outside that body without the consent of the data subjects.

8. Who does the WEA share my personal data with?

The WEA may share some or all of your personal data with:

- Data processing organisations under contract with the WEA
- Other data controllers offering specific services to the WEA (e.g. WorldPay who's Privacy Notice is available at worldpay.com/uk/worldpay-privacy-notice)
- Media organisations (only with your additional permission)
- Statutory bodies (e.g. Safeguarding Authority, Health & Safety Executive, Information Commissioners Office)

If you require more detailed information about who we share personal data with, please contact dataprotection@wea.org.uk

9. International transfers of data

Your data may be transferred internationally. If your data is transferred, WEA will legally safeguard your personal data by:

- Transferring to the EEA countries
- Transferring to an adequate EU country, or a US Privacy Shield company.
- Transferring under “EU Model Clauses” agreement with the importing party.

Owing to the global nature of the Internet infrastructure, the information you provide may be transferred in transit to countries outside the European Economic Area that do not have similar protections in place regarding the protection of your personal data. Where this is the case end-to-end encryption will be employed to transmit the data securely.

10. How long do we keep your personal data?

The WEA will keep your personal information for the duration of your membership with us. If your membership is cancelled or is not renewed, the WEA will keep your personal information for **two years** to give you sufficient additional time to renew your membership. After this time, your membership record will be destroyed or anonymised.

11. Does the WEA use automated decision making?

If you have been invited to participate in a learning activity on our e-learning platform (Canvas), we may use automated methods to mark any tests or assessments that you undertake. With the exception of this, the WEA does not use automated means to make decisions that affect you.

12. What are my rights?

The right to be informed - the WEA must provide you with information about what we are using your personal data for, why we are using it and how long it will be kept for.

The right of access - at any time, you have the right to obtain access to the personal data the WEA holds about you.

The right to rectification - at any time, you have the right to ask for incorrect, inaccurate or incomplete personal data to be corrected.

The right to erasure - at any time, you have the right to ask for any personal data the WEA holds on you to be erased when it's no longer needed or if holding it is unlawful.

The right to object - at any time you have the right to object to the processing of your personal data for marketing or research purposes.

The right to data portability - at any time you have the right to request that the WEA provides your personal data in a machine-readable format so that you can send it to another organisation or individual.

Rights in relation to automated decision making and profiling – at any time, you have the right to challenge the results of automated assessments carried out on the Canvas e-learning

platform and request that they be marked by a person. The best way to do this is to contact the person who organised the learning activity. It can also be requested as a Subject Access Request (see the 'how do I exercise my rights?' section below).

The right to restrict processing - at any time you have the right to request that the WEA restricts the processing of your personal data. This is not an absolute right and only applies in certain circumstances. It means that the WEA can store your personal data but must not do anything with it until the restriction is lifted.

13. How do I exercise my rights?

In order to exercise your rights under the General Data Protection Regulation you must make a Subject Access Request (SAR). You can do this by completing our SAR web form: <https://app-de.onetrust.com/app/#/webform/25919219-0f28-40a4-a522-ab332669e8ac> or by calling our Helpdesk on 02070 967738.

14. How do I complain?

If you are unhappy with the way the WEA has handled your personal data and you would like to make a complaint, please contact our Data Protection Officer.

Tel: 0300 303 3464
 Email: dataprotection@wea.org.uk
 Address: 10B, Josephs Well, Hanover Walk, Leeds, LS3 1AB

If you don't feel that the WEA has responded to your complaint in a satisfactory manner, you can then raise concerns about the processing of your personal data with the Information Commissioners Office (ICO). Please see: ico.org.uk/concerns or call the ICO on 0303 123 1113.

15. Review Period

This privacy notice should be reviewed every six months by the Senior Data Protection Officer and Data Owner.

16. Revision History

Version Number	Date of Change	Description of Change
0.1	12/10/2018	Re-drafted version
0.2	12/10/2018	Comments and amendments from JT
0.3	12/10/2018	Amendments following call with JT, JW, JH, LH Signed off by JW on 11/10/2018
0.4	14/01/2018	Amendments following revision of the Data Protection Policy, launch of e-learning platform and review by new data owner.
0.5	18/01/2018	Inclusion of bank details and provision for the use of WorldPay as a third party controller.
0.6	22/01/2019	Retention period increased to 2 years as agreed with AA. Signed off by AA 22/01/2019