



## Privacy Notice

The Gloucestershire and Wiltshire Partnership (GWP) is a non-incorporated organisation committed to protecting your privacy and processing your information in a fair, lawful and transparent way.

This notice explains how we process the information we collect as part of our ongoing work to support members of the network, our stakeholders and those who use our services. This notice was most recently updated on 21 May 2018 in line with the new EU General Data Protection Regulations (GDPR) which take effect from 25 May 2018.

The notice is split into three sections:

- Information for members of the Network
- Information for any individual who attends our events and uses our website
- General information about your rights about personal data

### 1. Information for Members of GWP

When we refer to 'member organisation' we mean the organisation that has joined the GWP Network, has paid an annual membership fee, attends network meetings or other network events and utilises the services of the network.

When we refer to 'member contact' we refer to the individual people within that member organisation who have been registered as points of contact.

### What information we collect and why

When an organisation joins the Network, we collect information about the organisations who have joined as members, for membership purposes. This includes:

- Name
- Organisation
- Job title
- Organisation address
- E-mail
- Telephone
- Organisation website
- Types of learning and training or service, geographical spread and sectors covered
- Website URL

### How we use your information

If you are a member contact with an organisation, we will:

Send you local and national Industry relevant news, details of tendering opportunities, information and opportunities from the Network and its member organisations

Send you ad hoc e-mails with invitations for you and your colleagues to participate in relevant events and initiatives which GWP are delivering, supporting, or are associated with.

Notify you about any membership processes, updates or organisational changes from GWP that relate to and/or may impact on your organisation's membership of the Network.

Contact you to ensure the information we hold for you is correct

Contact you to request feedback or invite your participation in bids or surveys for research purposes and to improve the services we provide.

We do not share your personal data with any third parties.

On occasion we share and report on member organisation's information for research and communication with potential business customers and internal evaluation purposes.

We do publish a list of members organisations on our website. You have the option to withdraw from this list at any point by e-mailing [admin@gw-partnership.ac.uk](mailto:admin@gw-partnership.ac.uk).

We primarily communicate using e-mail, and through our website.

From time-to-time we may use member organisation's e-mail addresses or phone numbers to get in touch with member contacts if we have any essential administrative queries regarding your membership.

### **How we store your personal data and for how long**

We will store all membership information on a password protected laptop, kept securely at the premises of the Partnership Manager.

When a member contact unsubscribes or moves on from their organisation, or we receive an e-mail bounce-back, their record will be deactivated and they will no longer receive membership communications. Information about their engagement with the Network will remain on the associated member organisation's account within our database for a period of no more than one year.

### **Lawful basis for processing data**

Our lawful basis for processing personal data is consent. Organisations freely ask to join the Network and individual's opt-in to become member contacts for that organisation by providing their consent for us to process their data for this purpose. Currently, this joining process is by e-mail. We have not and will never use any method of default consent to enable us to collect and process your personal information as a member contact with a member organisation. We have updated our online form privacy statement to provide more information about our data processing for new members at the point of joining.

Our lawful basis for processing and storing information about your engagement with the Network is legitimate interest – this processing is essential to the development of the network and the services we provide by helping us to understand how and to what extent both you and your organisation has engaged with GWP.

Anyone who is signed up to GWP and has paid their membership fee has the option to deactivate organisational membership, or deactivate individual involvement as a member contact, at any point. You can do this by sending an e-mail to [admin@gw-partnership.ac.uk](mailto:admin@gw-partnership.ac.uk).

Please note that without at least one-member contact, an organisation's membership will become inactive.

Any individual can ask us to delete any personal data that we hold at any point during membership or within two years of deactivating a membership by sending a 'Delete personal data' request to [admin@gw-partnership.ac.uk](mailto:admin@gw-partnership.ac.uk).

## **2. Website privacy information**

### **Our Website**

Our company is hosted on a platform held by Creative Affinity. Creative Affinity provides us with the online platform that allows us to promote our services to you. Your data may be stored through Creative Affinity's data storage, databases and the general Creative Affinity'scom applications. They store your data on secure servers behind a firewall.

We collect queries via the contact form, but do not collect any data from members through the website.

If you visit the website but do not provide your details, we do not collect any personal information about you through the website, although we may track your use of the website using cookies. Cookies are small anonymous text files that are placed on your computer by websites that you visit.

We use Google Analytics cookies to track anonymous usage statistics and do not collect any personal information that can be used to identify you. This helps us analyse data about webpage usage and improve our website in order to tailor it to user needs.

Most web browsers allow some control of most cookies through the browser settings. To find out more about cookies, including how to see what cookies have been set and how to manage and delete them, visit [www.allaboutcookies.org](http://www.allaboutcookies.org). To opt out of being tracked by Google Analytics across all websites you can visit [www.tools.google.com/dlpage/gaoptout](http://www.tools.google.com/dlpage/gaoptout)

GWP makes every effort to maintain the accuracy of the information on our website and in our digital communications but cannot accept responsibility for any loss or damage which may occur from use of the information. This website and our digital communications may contain links to external websites managed and maintained by external companies. We are not responsible for the privacy practices, cookie policies or the content of such websites or of other third parties. GWP does not provide quality control of external links; the inclusion of any company's name within the pages or digital communications should not be construed as a recommendation of that company's products and / or services.

We reserve the right to modify this privacy policy at any time, so please review it frequently. Changes and clarifications will take effect immediately upon their posting on the website. If we make material changes to this policy, we will notify you here that it has been updated, so that you are aware of what information we collect, how we use it, and under what circumstances, if any, we use and/or disclose it.

### **3. Information about your rights**

You have a number of rights in relation to your personal data. These include the right to:

- find out how we process your personal data
- request that your personal data is corrected if you believe it is incorrect or inaccurate
- obtain restriction on our, or object to, processing of your personal data
- withdraw your consent to our processing of your personal data
- obtain a copy of the personal information which we hold about you.

If you would like to make a Subject Access Request and obtain a copy of the personal information that we hold about you, we are more than happy to do so free of charge – with the exception of requests that are manifestly unfounded, excessive or repetitive. If we determine this to be the case, we may charge a reasonable fee or refuse to act on the request.

We will respond and provide the information within 40 days of receiving your request. Please send your request to the GWP Partnership Manager, at [admin@gw-partnership.ac.uk](mailto:admin@gw-partnership.ac.uk) with Subject Access Request in the subject line. We may take steps to verify your identity before responding to your request.