



DATA PROTECTION, PRIVACY & COMMUNICATIONS POLICY

APRIL 2021

**INNER WINGS, A REGISTERED CHARITY IN ENGLAND AND WALES.
CHARITY NUMBER: 1192877**

1. Introduction

Inner Wings, A Confidence Building Foundation is a registered charity in England and Wales and aims to build confidence, courage and bravery in young girls aged 6 to 12 around the world through a wide range of available programmes and events.

Our charity registration number is 1192877 and our registered trading address is c/o Adler Shine; Aston House; Cornwall Avenue; London; N3 1LF; England.

www.innerwings.org is a website operated by Inner Wings, A Confidence Building Foundation.

Inner Wings takes the privacy of our trustees, employees, volunteers and beneficiaries very seriously. We are strongly committed to protecting your privacy and all reasonable efforts are taken to ensure that your data is kept safe and secure. This policy describes how Inner Wings collects and uses the personal data of the people who visit our website and provide us with their data telephonically, in writing and face to face. This policy states why and how we use the data, how we store it and how your personal preferences can be amended.

By using our website, you are accepting and consenting to the practices described in this policy. If you have any queries about this policy, please contact us via email at: dataprotection@innerwings.org

2. Inner Wings Privacy Statement

GDPR provides the legal framework that defines how personal data can be used. Inner Wings is fully committed to complying with the principles set out in GDPR and has a legal duty to protect any data collected from you.

In summary:

- We only collect data that is required.
- Your personal data is used solely for the purpose(s) for which we collect it.
- Your personal data is seen only by those who need it to do their jobs.
- We will only disclose data when we have your consent, or where we are obliged to disclose personal data by law, or as expressly permitted under the GDPR (through contract; legal obligation, vital interests; public task; or legitimate interests).
- Your data will be kept up to date. Incorrect data will be corrected as soon as possible.
- Personal data will be kept for the length of time it is required for the purpose(s) collected. Typically, this will be for a maximum of 5 (five) years. Notwithstanding a legal requirement to do otherwise, steps will be taken to remove your personal data from our records after 4 (four) years.
- Your data will be protected from accidental or unauthorised or accidental disclosure and processed in the correct manner to maintain both its integrity and confidentiality.
- On request we will provide you with a copy of your personal data.
- These principles apply whether we keep your data in electronic form or on paper.

3. How Do We Collect Data?

If you provide services to Inner Wings, we will collect data in line with your contract for services.

We may also collect technical data relating to your use of our website, using Google Analytics and Hotjar. This data includes your browser type or the Internet Protocol (IP) address used to connect your computer to the internet.

We also gather general data about the use of our website, such as which pages are visited regularly, and which events are of most interest.

We obtain personal data from you when you submit an enquiry about the foundation and the services we offer; when you register with us; make a donation to the foundation or contact us via email with a question.

We will only ever collect the data that we need, including that which will be useful to assist us with improving our services. The data is required either to fulfil your request or to enable us to provide you with a more personalised service. It is not necessary to provide this data to view our website.

4. What Data Do We Collect?

The personal data we collect might include, but is not limited to, name, date of birth, email address, postal address and contact telephone number.

We may also request certain types of personal data depending on the purpose for which you have contacted Inner Wings. We may request certain types of personal data only if permitted to do so by data protection law and provided we have further measures in place to protect this data.

5. Why Do We Collect this Data?

We collect this data for the purposes of endorsing the aims of Inner Wings and for effective and appropriate communication with our members and to provide support to our beneficiaries. The legal foundation for which we collect your data is:

- your consent;
- processing is required for the fulfilment of a contract to which you are a party. If you fail to provide this data we may be unable to fulfil the contract;
- processing is required to comply with our legal obligations, for example divulging any employee salary details to HMRC;
- processing is required to protect your interests or that of another person;
- processing is required for the performance of all and any duties carried out in the public interest.

6. How Do We Use this Data?

We will use the data you provide in the ways set out below:

- promote the aims of Inner Wings;

- to provide and personalise our services to our members and beneficiaries;
- to communicate with our trustees, members and volunteers when dealing with your enquiries and requests, recording any contact with you;
- to provide you with information based on your interests for example details around our campaigns, fundraising and volunteering activities and how you can support us;
- to track user behaviour on our website, using Google Analytics and Hotjar;
- we may use this data to personalise and make improvements to the way our website is presented to users and to ensure our users are provided with the best service;
- to claim Gift Aid on your donations;
- to conduct market research;
- for administrative reasons.

7. Do We Share Your Data with Anyone Else?

Your data is shared with our providers, with whom we engage to process data on our behalf. In such cases data is only shared for the purposes of providing services on behalf of Inner Wings which relates to communications or agreements between yourself and Inner Wings. The processing of such data is conducted under relevant Data Processing Agreement.

Your data is shared with Google Analytics and Hotjar in order to track user behaviour on the website.

Inner Wings may also be required to disclose your data by law or as expressly permitted under applicable data protection legislation.

Inner Wings does not sell or provide personal data to other third parties or charities.

Inner Wings website may include links to other websites that are run by other organisations – charitable or otherwise. Inner Wings is not responsible for the privacy practices of these other websites so you should familiarise yourself with their privacy policies before sharing any personal and / or financial data.

8. Storing and Protecting Your Data

We understand that many people have concerns around providing personal data online.

The security of all personal data associated with our trustees, members and volunteers is of great importance to us. We have measures in place to protect against potential loss, misuse or destruction of personal data that is under our control. Personal data of our trustees, members and volunteers is stored by us on computers and all our online forms are protected by encryption.

However, data transmission over the internet is not 100% secure, and as a result we use our best efforts to prevent loss, misuse or destruction of personal data that is under our control to prevent this and protect your personal data.

9. Children

Inner Wings is committed to protecting the privacy of children aged under 18 years. Prior to collecting personal data from a child aged under 18 years, we will seek consent from a parent or guardian and will never knowingly request or collect data online from a child that can be traced back to the child; for example a name, email address or data about the child's family. We will not knowingly use data provided by a child for any fundraising or promotional purposes without the advance consent of a parent or guardian.

10. Your Rights

You have a right to object at any time, to Inner Wings using your personal data where we rely on our legitimate interests for doing so. These requests must be sent via email to dataprotection@innerwings.org.

You also have a right to object to the use of your data for marketing purposes. Inner Wings will only act on the choice of communication you request and how you choose to receive such communications. You have a right to choose what information you want to receive about the Charity's work and fundraising activities and we make it easy for you to let us know how you would like us to communicate in a way that suits you. You also have the right to choose not to hear from us and if so, we will not use your personal data for marketing purposes. Should you want to change your preferences for what you receive from us and how, you can contact our support team at supportteam@innerwings.org.

11. Right of Access

You have a right to request access to your data and to ask us to confirm whether we are processing data about you. To obtain a copy of the personal data we hold about you, please send a written request, with proof of your identity to dataprotection@innerwings.org.

12. Cookie Usage

Inner Wings website uses cookies, which are small data files that are served by our platform and stored on your device. Our website uses cookies for a variety of purposes including to operate and personalise the website, ensuring that you see content that is relevant to you. Cookies also assist us with providing you with an improved experience by helping us to understand what areas of our website are of most interest to our users (e.g. with Google Analytics and Hotjar).

13. Trademarks and copyright

Inner Wings website contains material which is protected by copyright and/or other intellectual property rights. All copyright and intellectual property rights including the name, logo and images are owned by Inner Wings unless otherwise stated. All rights are reserved.

14. Amendments

We reserve the right to amend the terms of this privacy statement when required but will not lessen your rights under this Privacy Policy without your explicit consent. When amendments are made, they will be posted here, and prior versions of this policy will be kept in an archive. Continued use of our website will mean acceptance of any and all amendments.

The terms of this policy may change, so please check it from time to time. This version published April 2021, supersedes any and all previous versions.

If you have any questions about this policy, please contact us via email at dataprotection@innerwings.org.