

# Privacy Policy

## Notice to Our Customers:

Keeping your personal information safe and secure is our top priority. That's why we want to notify you of some changes to our privacy policy in readiness for the introduction of the new data protection legislation on 25 May 2018.

The legislation doesn't alter what we use your personal information for but makes it easier for you to find out how we use and protect your information. The fact that the law is changing only builds on what we already do today – and that is to give your personal information the respect and security it deserves.

## Who Is This Privacy Notice from?

As required by data protection law, this privacy notice gives you information from the data controller who uses your personal data, namely,

Worcester Muslim Welfare Association (Charity number 1173764) whose registered office is Central Mosque, Tallow Hill, Worcester, WR5 1JU.

In this notice, WMWA must explain some things about the personal data it holds, and your rights regarding those data.

You can contact us at the above address

## What Is This Privacy Notice About?

We'll collect certain personal information from you when you use our website, when you get in touch with us about becoming a customer and during your customer journey.

The purpose of our privacy policy is to let you know:

- how and why we collect your personal information;
- how we use and disclose your personal information (and to whom);
- how we protect your personal information; and
- how you can access your personal information.

## What Personal Data Do WMWA hold About You?

Privacy Policy.

Date:

Review:

V1

1/5/2019

Mohammed Iqbal

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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, store and transfer different kinds of personal data about you which we have grouped together as follows:

- **Identity Data**  
includes first name, maiden name, last name, username or similar identifier, title, date of birth, geographic location.
- **Contact Data**  
includes address, email address and telephone numbers (business and / or personal and, also details of any nominated account holder).
- **Financial Data**  
includes bank account and payment card details relating to products and services you receive from WMWA
- **Transaction Data**  
includes details about payments to and from you and other details of products and services you have purchased or requested from WMWA
- **Technical Data**  
includes internet protocol (IP) address, your login data, 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 our website. We track technical data by using cookies – see section ‘WMWA use of cookies’ below for more details on cookies
- **Profile Data**  
includes purchases or donations made by you, preferences, feedback and correspondence with us.
- **Donation Data**  
including information about how you use our website, donations made and services utilised.
- **Marketing and Communications Data**  
includes your preferences in receiving marketing from us and our third parties and your communication preferences.

### Where Do WMWA Obtain Your Personal Data?

We collect necessary information (usually Identity, Contact, and Financial Data) during your sign-up journey to become a donor / customer, whenever you get in contact with us or use our website or as part of providing our services to you – for example, if you use our website to enquire about your account. We may also monitor and record any communications we have with you, including phone calls and emails, to make sure we are providing an excellent service to our customers.

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– Organisations that work jointly with us in fundraising events, volunteering / staff training.

– Third party introducers (such as organisations that work jointly with us in fundraising events, volunteering / staff training.

We may also receive Technical, Identity and Contact Data from analytics providers, such as Google based outside the EU.

### WMWA use of cookies

#### What are cookies?

A cookie is a piece of information stored in a small file which is sent to and from web pages. They can be used to identify that you've visited websites before and some will be stored on your computer by your web browser. They are anonymous, so they don't store any personal information of any kind.

#### How does WMWA use cookies?

We use cookies to understand how people use our websites and to help us to make your experience of our websites better.

#### WMWA websites

We use short-term cookies to recognise your PC as you move around our site and to remember any information you have entered into search boxes for next time you visit us.

#### Measuring web traffic

We use Google Analytics to help us find out how many people visit our websites, which pages and parts are most popular, how long people spend in each area and what information people are searching for. These insights help us understand how to improve our websites.

Google Analytics uses cookies to collect non-personally identifiable information like browser type, operating system, referring site, the date and also the time of a visit. If you'd like to know more please click

<https://support.google.com/analytics/answer/2790010>

for more information on Google Analytics.

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### How can you manage cookies and where can you find further information?

If you don't want us to use cookies in your web browser, you can remove them from your computer or change your browser settings so that it either blocks cookies altogether or asks you if you'd like to accept them from some websites.

You can also stop us collecting data through the following sources:

- Mix panel – download an opt-out browser add-on – the Mix panel opt-out browser can be found [here](#)
- Google Analytics Advertising Features – Click [here to adjust your personal settings as per their instructions](#)
- Adometry – click the link to opt-out of the Adometry cookie [here](#)
- Google DoubleClick (for Google AdWords Customer Match) – follow the link to download a plugin so you can opt-out of Google's advertising cookie on Chrome, Firefox or Internet Explorer [here](#)

Please note this does not opt you out of being served advertising.

However, please remember some of our cookies are essential for our websites to work properly, particularly in managing your account on the website.

The internet industry body, the Internet Advertising Bureau, has set up a website to provide information and advice on cookies, tags and behavioural advertising, you can click here to find out more about behavioural advertising. Another trusted source which gives information about how to delete and control cookies is <http://www.aboutcookies.org/>.

If you have any questions about the way we handle your personal information, please write to us at the above address.

### **What Is The Legal Basis For WMWA Using Your Personal Data and How Do We Use That Data?**

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

- Where we need to process your donation or enquiry.
- 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.

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– Where we need to comply with a legal or regulatory obligation.

### **Legitimate Interest**

means the interest of our business in conducting and managing our business to enable us to give you the best service/product and the best and most secure experience. 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 using the details at the end of this policy.

### **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.

### **Consent**

means processing your Special Categories of Personal Data with your express, freely given, specific and informed consent.

### **Information made public**

by you means processing your Special Categories of Personal Data where the processing relates to personal data already manifestly made public by you.

### **With Whom Will WMWA Share Your Data?**

We may allow other organisations and people to use personal information we hold about you:

– To provide any services you have asked for, including providing information to members of your family or household and anyone acting on your behalf (provided you've authorised this) and providing your information to relevant parties. (for example, when volunteers accompany WMWA, in assisting with a project delivery, we will share your information with Travel Agents, Travel Insurance brokers, Accommodation, in order to facilitate the visit)

Additionally, your information is also shared with:

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(a) Organisations for the detection, investigation and prevention of crime

(b) Financial organisations for purposes such as payment processing,

(c) We use GoCardless to process your direct debit payments. More information on how GoCardless processes your personal data and your data protection rights, including your right to object, is available at

<https://gocardless.com/legal/privacy/>

(d) We use Stripe for to process card payments. More information on how Stripe processes your personal data and your data protection rights, including your right to object, is available at

<https://stripe.com/gb/privacy>

(e) We use Virgin Giving for our web platform. More information on how Virgin Giving processes your personal data and your data protection rights, including your right to object, is available at

<https://uk.virginmoneygiving.com/giving/terms/privacy-policy-charity-user.jsp>

(f) We use DONR for text giving as our platform. For more information on privacy policy are here below.

<https://donr.com/legal/privacy-policy>

– To provide you with information about products and services from those other organisations which may be of interest to you;

– If we have been asked (for example, by a regulatory authority such as the Charities Commission) to provide information for legal or regulatory purposes; or

- As part of current or future legal action.

We will not pass your information on to any third parties for any purpose other than to fulfil performance of our obligations to you, to comply with our legal obligation, for our legitimate purposes or for the relevant industry parties to use the data they require to fulfil their legitimate purposes.

### Disclosing information outside the EU

Sometimes these organisations or people may be outside the European Economic Area (EEA), so we may pass your personal information to countries that do not have the same standards or protection for personal information as the UK. If we, our agents or our service providers do this, we'll always make sure that these organisations will secure your personal information.

### **What About The Other People WMWA Has Given Your Data To?**

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Some of the people mentioned above just use your personal data in the way WMWA tells them. However, others may make their own decisions about how they use this information to perform their services or functions, or to comply with regulatory responsibilities as controllers in their own right. In this case, they are subject to the same legal obligations as WMWA regarding this information.

The rights you have regarding your information apply to them too. If you want any more information on any of these recipients or to use any rights regarding the information they hold, please contact WMWA and we will be happy to discuss this with you.

WMWA will not pass your information on to any third parties for any purpose other than to fulfil performance of our contract with you, to comply with our legal obligation, for our legitimate purposes or for the industry/regulatory bodies to use the data they require in performance of theirs.

### Marketing from WMWA?

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising. We have established the following personal data control mechanisms:

#### Promotional offers from us

We may use your Identity, Contact, Technical, Donation and Profile Data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which products, services and offers may be relevant for you (we call this marketing). We may tell you about exciting new products and services from WMWA).

You will receive marketing communications from us if you have requested information from us or purchased goods or services from us and, in each case, you have not opted out of receiving that marketing.

When you first provide your personal information to us we'll give you the chance to choose whether you'd be happy for WMWA to contact you with marketing information and if you have any preferences for the way you'd like to be contacted. This may include contacting you by post, email, phone, SMS, multimedia message or other forms of electronic communication, or we might visit you in person to do this.

#### Third-party marketing

We will get your express opt-in consent before we share your personal data with any company outside the WMWA for marketing purposes.

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### Opting out

If you'd prefer not to receive this sort of marketing information from us and or third parties, or should you want to change how you receive it, you can always or follow the opt-out links on any marketing messages sent to you.

We'll occasionally remind you that you can update your preferences for receiving marketing information, or if you haven't told us what your preferences are, we might ask you in communications with you.

Where you opt out of receiving these marketing messages, this will not apply to personal data provided to us as a result of a product / service purchase, product / service experience or other transactions.

Automated decision making – WMWA may profile your data for marketing and communication purposes, which you can opt out of. It does not carry out any automated decision-making that would produce legal or other significant effects on you.

### **Managing Your Preferences with WMWA?**

WMWA aims to ensure you only receive communications about information that is of interest to you or that enhances its services to you and, if so we will contact you using your chosen method of communication.

You can change your communication preferences for marketing or communications using your account on our website.

### **How Long Do WMWA Keep Your Personal Data?**

WMWA only collect information relevant to providing our service and will not hold onto your information longer than is reasonable to carry out provision of this service (including for the purposes of satisfying any legal, accounting, or reporting requirements); although, we may be required to hold certain information a little longer for the relevant industry parties, for example Gift Aid Claims.

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.

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We will conduct reviews of what designates an appropriate retention period for your data, annually in line with the factors mentioned above and, if this process changes, we will update this policy.

### Keeping Your Personal Data Safe?

We follow strict security procedures to protect your personal information. This includes following certain guidelines (for example, checking your identity when you phone us).

We strongly recommend that you do not disclose your WMWA login details to anyone. Please remember to logout of your account when you have finished using your online account.

From time to time, our website may provide hypertext links to sites which are created by individuals and /or companies outside of WMWA. We do this if the site is relevant to the topic you're reading about. Whilst we always try to check that the content of these sites is suitable, we cannot take any responsibility for the practices of the companies who publish the sites that we link to, or the accuracy or relevance of the content on them.

Please also remember that 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.

### How You Can Help Keep Your Personal Data Up to Date?

WMWA need to ensure your personal data is accurate and up to date. Please tell us if your details change (for example, if you move address). In addition, you have rights under data protection law to have inaccurate personal data corrected and incomplete data completed.

For more details about your rights, please see below.

### Your Rights as A Data Subject?

You have the right to lodge a complaint directly with the supervisory authority, the Information Commissioner's Office (ICO) ([www.ico.org.uk](http://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.

You have other rights under data protection law that you can exercise in relation to your personal data which we hold but these do not apply in all circumstances. You can exercise those rights free of charge except in very limited circumstances, which

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will be explained to you if relevant, including where 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.

When exercising these rights, we may ask you for proof of your identity. 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.

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.

For more information about all these rights, and how to exercise them, please contact us and we will be happy to discuss these with you.

Here are short descriptions of your rights:

**Right of access** – you have a right to request a copy of the personal data we hold about you, to obtain confirmation that it is being processed, and to obtain certain prescribed information about how it is processed.

**Right of rectification (correction)** – in certain circumstances you have a right to ask for your personal data to be corrected if it is inaccurate, and completed if it is incomplete, although we may need to verify the accuracy of the new data you provide to us. Where your personal data in question has been disclosed to third party organisations, they must be informed of the rectification, if possible.

**Right to request erasure (sometimes referred to as the “right to be forgotten”)** – in certain circumstances, you can ask to have your personal data deleted or erased: where there is no reason for us to continue to process it; where you have successfully exercised your right to object to processing (see more below); where we may have processed your information unlawfully; or where we are required to erase your personal data to comply with local law. It is unlikely to be possible to accept your request for erasure for certain specific legal reasons, including if, for example, WMWA has a duty to retain or process your information. Any such reasons will be notified to you, if applicable, at the time of your request.

**Right to restriction of processing** – if certain conditions apply, you have a right to restrict the processing of your information. This includes when you contest it as being inaccurate (until the accuracy is proved); if you have objected to the processing (when it was necessary for legitimate interests) and WMWA is considering whether its legitimate interests override your own; where our use of the personal data is unlawful but you do not want WMWA to erase it; or if WMWA no longer need the personal data for the purposes we held it but you require us to continue to hold it to establish, make or defend legal claims.

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Right of portability – in certain circumstances, you have the right to request the transfer of your personal data to a third party or to yourself. This right is only relevant if personal data is being processed based on a consent (or for performance of a contract) and is done automatically. This right is different from the right of access (see above). We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format.

Right to object – in certain circumstances, you have the right to object to certain types of processing of your personal data when our processing is based on legitimate interests and there is something about your particular situation, which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object to processing when your personal data is processed for direct marketing (including profiling relevant to direct marketing) or when it is processed for the purposes of statistics. In some cases, we may demonstrate that WMWA has compelling legitimate grounds to process your information which override your rights and freedoms.

Right to withdraw consent – You can also withdraw consent if you have provided it and if this is relied on as the legal basis for WMWA using your personal data – as previously described.

### Changes to This Privacy Policy?

This notice was last updated 1<sup>st</sup> May 2019. WMWA may amend this privacy notice from time to time to keep it up to date or to comply with legal requirements. If you have access to the internet, you should regularly check this privacy notice for updates. If necessary, you may be notified of changes. Your contact details (as previously offered) would be used for this purpose, based on the legal basis of compliance with legal obligations or legitimate interests (or both, as relevant).

### How to Contact WMWA?

If you wish to make a complaint, find out more information about how your personal data is being processed by WMWA as your data controller, or exercise your rights, you can contact us on the details below.

If you do contact us, we'll need to verify your identity before moving forward with the request.

### You can write to Data Protection.

Worcester Muslim Welfare Association, Central Mosque, Tallow Hill, Worcester, WR5 1JU.

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