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Wishing Well Data Protection Policy

Wishing Well is committed to protecting your privacy. This policy explains how we collect and use the personal information you provide to us whether online or via phone, mobile, e-mail, letter or other correspondence. By using our website, any of our services, or providing us with any personal information we will assume you are agreeing to your information being used and disclosed in the ways described in this policy.

1. GDPR

The EU General Data Protection Regulation (GDPR) effective from May 2018 gives all EU citizens more rights and protections for their personal data, to minimise the possibility of theft and fraud.

These regulations include provisions for the following areas:

- The right to be informed: Organisations must publish a privacy notice, in addition to explaining transparently how they use this personal data.
- The right of access: Individuals will have the right to demand details of any of their data that an organisation may hold. This information must be provided within one month of request at no charge to the individual.
- The right to rectification: If a person's data is incorrect or incomplete, he or she has the right to have it corrected. If the organisation that holds the information has passed any of that information to third parties. The company must inform the third party of the correction and inform the person which third parties have their personal data.
- The right to be forgotten: A person may request the removal of his or her personal data in specific circumstances.
- The right to restrict processing: Under certain circumstances, an individual can block the processing of his or her personal data.
- The right to data portability: A person can access their data for their own use anywhere they prefer.
- The right to object: A person can object to the use of their personal data for most purposes.

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We operate our Data protection in compliance with BS 10012:2017: Specification for a personal information management system.

a) Our core principles regarding user privacy and data protection:

User privacy and data protection are inviolable human rights

- We have a duty of care to people contained within our data
- Data is a liability: it should only be collected and processed when absolutely necessary
- We despise spam in all its forms
- We will never sell, rent or otherwise distribute or make public any personal information

b) Relevant legislation

Alongside our business and internal computer systems, this Wishing Well website is designed to comply with the following national and international legislation with regards to data protection and user privacy:

- [UK Data Protection Act 1988 \(DPA\)](#)
- [EU Data Protection Directive 1995 \(DPD\)](#)
- [EU General Data Protection Regulation 2018 \(GDPR\)](#)

This site's compliance with the above legislation, all elements of which are stringent in nature, means that this site is likely to be compliant with the data protection and user privacy legislation set out by many other countries and territories as well. If you are unsure about whether this site is compliant with your own country of residences' specific data protection and user privacy legislation you should contact our data protection officer (details of whom can be found in section 9.0 below) for clarification.

2. Data Protection Act

In carrying out our day to day activities we process and store personal information relating to our supporters and we are therefore required to adhere to the requirements of the Data Protection Act 1998. We take our responsibilities under this act very seriously and we ensure the personal information we obtain is held, used, transferred and otherwise processed in accordance with that Act and all other applicable data protection laws and regulations including, but not limited to, the Privacy and Electronic Communication Regulations.

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3. Our website collects and uses personal information for the following reasons:

3.1 Site visitation tracking

Like most websites, this site uses Google Analytics (GA) to track user interaction.

We use this data to determine the number of people using our site, to better understand how they find and use our web pages and to track their journey through the website.

Although GA records data such as your approximate geographical location, device, internet browser and operating system, none of this information personally identifies you to us.

GA also records your computer's IP address which could be used to personally identify you but Google do not grant us access to this. We consider Google to be a third party data processor (see section 6.0 below).

GA makes use of cookies, details of which can be found on Google's developer guides.

[Disabling cookies on your internet browser will stop GA from tracking any part of your visit to pages within this website.](#)

3.2 Forms and email links (if you don't store emails)

Should you choose to contact us using the contact form or an email link, none of the data that you supply will be stored by this website or passed to/be processed otherwise than by any of the third party data processors defined below.

Instead the data will be collated into an email and sent to us over the Simple Mail Transfer Protocol (SMTP). Our SMTP servers are protected by TLS (sometimes known as SSL) meaning that the email content is encrypted using SHA-2, 256-bit cryptography before being sent across the internet. The email content is then decrypted by our local computers and devices.

4. Information sharing and disclosure

We will not sell or swap your information with any third party.

We may share your information with our data processors. These are trusted partner organisations that work with us in connection with our organisation's purposes. All our trusted partners are required to comply with data protection laws and our high standards and are only allowed to process your information in strict compliance with our instructions. We will always make sure appropriate contracts and controls are in place and we regularly monitor all our partners to ensure their compliance.

We may disclose your personal information to third parties if we are required to do so through a legal obligation (for example to the police or a government body); to enable us to enforce or apply our terms and conditions or rights under an agreement; or to protect us, for example, in the case of suspected fraud or defamation.

We do not share your information for any other purposes.

5. The accuracy of your information

We aim to ensure that all information we hold about you is accurate and, where necessary, kept up to date. If any of the information we hold about you is inaccurate and either you advise us or

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we become otherwise aware, we will ensure it is amended and updated as soon as possible.

6. Storing your information

Although most of the information we store and process stays within the UK, some information may be transferred to countries outside the European Economic Area. This may occur if, for example, one of our trusted partners servers are located in a country outside the EU. These countries may not have similar data protection laws to the UK however, we will take steps with the aim of ensuring your privacy continues to be protected as outlined in this privacy policy. We will keep your information for as long as required to enable us to operate our services but we will not keep your information for any longer than is necessary. We will take into consideration our legal obligations and tax and accounting rules when determining how long we should retain your information. When we no longer need to retain your information we will ensure it is securely disposed of, at the appropriate time.

7. Our website

Our websites use cookies to help them work well and to track information about how people are using them. More information on cookies can be found below.

For all areas of our website which collect personal information, we use a secure server. Although we cannot 100 percent guarantee the security of any information you transmit to us, we enforce strict procedures and security features to protect your information and prevent unauthorised access.

Our website contains links to other websites belonging to third parties and we sometimes choose to participate in social networking sites including but not limited to Youtube and Facebook. We may also include content from sites such as these on our website however, we do not have any control of the privacy practices of these other sites. You should make sure when you leave our site that you have read and understood that site's privacy policy in addition to our own.

8. Cookies

What are cookies?

Cookies are small text files that are placed on your computer by websites that you visit. They are widely used in order to make websites work, or work better, as well as to provide information to the owners of the site. A cookie often contains a unique number, which can be used to recognise your computer when a user of your computer returns to a website that it visited previously.

How does Wishing Well use cookies?

We use cookies to enhance the online experience of our visitors, to better understand how our websites are used (see Google Analytics above)

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Your rights:

- Our cookies do not store financial information or information which is capable of directly identifying you (such as your name or address).
- You have the right to choose whether to accept these cookies.
- You can exercise this right by amending or setting the controls on your browser to reflect your cookie preferences. However, please note that if you choose to refuse cookies you may not be able to use the full functionality of this website.

Changing your cookie preferences

The “Help” menu in the toolbar of most web browsers will tell you how to change your browser’s cookie settings, including how to have the browser notify you when you receive a new cookie, and how to disable cookies altogether. An online guide is available if you have difficulties trying to change your browser settings.

<https://support.mozilla.org/en-US/kb/enable-and-disable-cookies-website-preferences>

<https://support.google.com/accounts/answer/61416?co=GENIE.Platform%3DDesktop&hl=en>

<https://support.microsoft.com/en-gb/help/17442/windows-internet-explorer-delete-manage-cookies>

Cookie terminology

We have classified our cookies into two broad types – ‘first party cookies’ and ‘third party cookies’:

- First party cookies: A small amount of text stored in the user’s computer that is created by the website the user is visiting. By default, first-party cookies are allowed in every Web browser.
- Third party cookies: A small amount of text stored in the user’s computer that is created by a website with a domain name other than the one the user is currently visiting. By default, third-party cookies are often allowed by a Web browser; however, they may be blocked, as they are widely used by advertisers to track browsing history.
- We use Google Analytics cookies which help us monitor the site and improve it to make your experience better.
- We also use some social media cookies which allow you to interact with our website through various social media sites such as Facebook, Twitter and YouTube.
- Our content management system will also set cookies without which the site could not function.

In addition, cookies may be either ‘session cookies’ or ‘persistent cookies’. Your computer automatically removes session cookies once you close your browser. Persistent cookies will survive on your computer until an expiry date specified in the cookie itself, is reached.

We do not use third party cookies that track your usage this and other websites to serve advertising.

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9. Data breaches

In the event of a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data, the Charity shall promptly assess the risk to people's rights and freedoms and if appropriate report this breach to the ICO (more information on the ICO website).

<https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/personal-data-breaches/>

10. Changes to the policy

This policy replaces all previous versions and is correct as of the date at the end of this web page. We will regularly review and update this Privacy and Data Protection Statement and will update, modify, add or remove sections at our discretion. Any changes will be notified to you through on this page. Your continued use of our website, any of our services and/or the continued provision of personal information after we have posted the changes to these terms will be taken to mean you are in agreement with those changes.

11. Your rights

You have the right to:

- request a copy of the information we hold about you;
- update or amend the information we hold about you if it is wrong;
- change your communication preferences at any time;
- ask us to remove your personal information from our records;
- object to the processing of your information for marketing purposes; or
- raise a concern or complaint about the way in which your information is being used.

If you wish to find out more about these rights, or obtain a copy of the information we hold about you, please contact our Data Controller / us at: jo@wishingwellmusic.org.uk

12. Privacy queries

If you have any questions or queries about this Privacy and Data Protection Statement, please contact us using the above address and contact details.

*Policy adopted: September 2019
Policy to be reviewed: June 2020*