

BCWA PRIVACY POLICY 1.0  
31.12.2019

The British and Commonwealth Women's Association Paris places a high priority on protecting your privacy. This Privacy Policy sets out how we collect, share, use, and store your personal information (this means any information that identifies or could identify you).

This Privacy Policy is subject to change. This is version 1.0 and was last updated on 31 Dec 2019. If we make any changes to this Privacy Policy, we will notify you via our website, member-wide email, or publish it in our newsletter.

Your continued use of our website, after the date that such notices are posted, will be deemed to be your agreement to the changed terms.

## **1. Who we are**

BCWAParis (British and Commonwealth Women's Association Paris) is committed to protecting your personal information and making every effort to ensure that your personal information is processed in a fair, open and transparent manner.

We are a "data controller" for the purposes of the EU General Data Protection Regulation 2016/679 ("Data Protection Law"). This means that we are responsible for, and control the processing of, the personal information we collect from you.

For further information about our privacy practices, you may contact:

BCWA Paris  
Address: Maison des Associations du 8e Arrondissement,  
Boite 86 - BCWA  
28 rue Laure Diebold, 75008, Paris, France  
Email: [bcwapresident@gmail.com](mailto:bcwapresident@gmail.com)

## **2. How we collect information about you**

All BCWA members voluntarily provide contact information on their Member Application form when they apply for membership in BCWA. We may collect information when you ask us about our activities, register with us for an event, make a donation, ask a question, apply for a volunteering opportunity or otherwise provide us with your personal information. This includes when you phone us or visit our website, or get in touch by email, the post, or in person.

When you visit our website, we gather general information which might include pages you visit most often, or which services, events or information is of most interest to you. We may also track which pages you visit when you click on links in emails from us. We also use "cookies" to help our site run effectively. See more information about 'Cookies' below.

We may use this information to personalize the way our website is presented and to make improvements to ensure we provide the best service and experience for our members and website users.

### **3. Information we collect and why we use it**

Personal information we collect may include but is not limited to: your name, date of birth, email address, postal address, telephone and mobile numbers, citizenship, volunteer interests and activity interests. We use this information for specific and limited purposes:

- To register you for membership activities, at your request.
- To update you with important administrative messages about an event, your membership status, or other services you have requested.
- To keep a record of your relationship with us.
- When you volunteer with us, to administer the volunteering arrangement.

You may choose to opt-out of sharing personal data now, or at any time in the future if you do not wish to receive BCWA messages. If you do not provide this information, we will not be able to sign you up for events, share news and information, or effectively administer your membership or any volunteering arrangement that you have entered into with us. This will make it impossible for you to remain a member of BCWA.

### **4. Legal basis for using your information**

In most cases, we will only use your personal information if we have your consent or because we need to use it in order to fulfil a contract with you (for example, because you have registered for an event on our website).

However, there are other lawful reasons that allow us to process your personal information and one of those is called 'legitimate interests'. This means that the reason that we are processing information is because there is a legitimate interest for BCWA to process your information to help us to provide a better service, to ensure you are provided with the services you have paid for and for legal compliance.

Whenever we process your personal information under the 'legitimate interest' lawful basis, we will take into account your rights and interests. We will not process your personal information in any case that does not clearly respect rights and interests.

Some examples of where we have a legitimate interest to process your Personal Information include if we contact you via post, use your personal information for data analytics, conduct research to better understand who our members are, improve our services, for our legal purposes (for example, dealing with complaints), or for complying with the law.

### **5. Communications**

We will only contact you about our organization and events that we think you will be interested in and /or how you can support BCWA, by phone or email, if you have agreed to be contacted in that manner.

If you have provided us with your postal address we may send you information in that way. You can update your choices or stop us sending these communications at any time by contacting [bcwapresident@gmail.com](mailto:bcwapresident@gmail.com)

Your communications with our teams (including by telephone or email) may be monitored and/or recorded for training, quality control and compliance purposes to ensure that we continuously improve our operational standards.

You may choose to opt out at any time, which will cease all communication from us.

## **6. Sharing your Information**

The personal information we collect about you will only be used by our committee members or activity leaders. All of these individuals will be required to read, understand, and comply with all BCWA privacy guidelines.

BCWA does not provide, sell, or rent any information to anyone outside the organization. Photos taken at Club events may be used on the BCWA website, BCWA Newsletters and on the members-only Facebook page.

### Legal disclosure

We may disclose your information if required to do so by law (for example, to comply with applicable laws, regulations, and codes of practice, or in response to a valid request from a competent authority); or, in order to enforce our conditions of sale and other agreements.

## **7. Keeping your information safe**

We take looking after your information very seriously. We've implemented appropriate physical, technical and organizational measures to protect the personal information we have under our control, both on and off-line, from improper access, processing, use, alteration, destruction, disclosure, and loss.

Unfortunately, the transmission of information using the internet and via email is not completely secure. Although we do our best to protect your personal information sent to us this way, we cannot guarantee the security of data transmitted by you to our site.

Our website page may contain links to other sites. While we try to link only to sites that share our high standards and respect for privacy, we are not responsible for the content or the privacy practices employed by other sites. Please be aware that any advertisers or Web sites that have links on our site may collect personally identifiable information about you. This privacy statement does not cover the information practices of those websites or advertisers. You should understand that your use of any linked website is solely at your own risk.

The BCWA website is hosted by Wild Apricot. You can read the Data Processing Addendum ("DPA") for the use of Wild Apricot's online membership management service ("Service") for the Processing of Personal Data, including EU Personal Data by clicking this [Link](#).

## **8. Retention period**

We retain membership information for the duration of the member's membership period. We may also store your information for a reasonable time after you have ceased being a member to allow you to re-join with ease and to fulfil our legal obligations regarding record retention. Upon termination of membership, your membership data will be archived unless you specifically request that it be removed from the BCWA database.

## **9. Your data rights**

All Members of BCWA have full access rights to their data and have the right to maintain, change or delete their personal information at any time.

These rights are set out in more detail below. If you wish to exercise any of these rights or make a complaint, you can do so by contacting us as outlined in Section 1 above.

### Access to your personal information

You have the right to request access to a copy of the personal information that we hold about you, along with information on what personal information we use, why we use it, how long we keep it, and whether it has been used for any automated decision making. You can make a request for access free of charge. Please make all requests for access in writing, including by email and provide us with evidence of your identity at the time of making any request.

### Right to object

You can object to our processing of your personal information when we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground. You also have the right to object if we are processing your personal information for direct marketing purposes. Please contact us as noted above, providing details of your objection.

### Consent

If you have given us your consent to use personal information, you can withdraw your consent at any time. Please contact us as noted above, providing notice that you have withdrawn your consent.

### Rectification

You can ask us to change or complete any inaccurate or incomplete personal information held about you. Please contact us as noted above, providing details of the inaccurate or incomplete information, what is required to correct the inaccuracy or to complete the information we hold about you.

### Erasure

You can ask us to delete your personal information where it is no longer necessary for us to use it, you have withdrawn consent, or where we have no lawful basis for keeping it. Please contact us as noted above, providing details of the personal information about you that you wish to have deleted.

### Portability

You can ask us to provide you or a third party with some of the personal information that we hold about you in a structured, commonly used, electronic form, so it can be easily transferred. Please contact us as noted above, providing details of your request.

### Restriction

You can ask us to restrict the personal information we use about you where you have asked for it to be erased or where you have objected to our use of it. Please contact us as noted above, providing details of the information you wish to restrict.

### No automated decision-making

Automated decision-making takes place when an electronic system uses personal information to make a decision without human intervention. You have the right not to be subject to automated decisions that will create legal effects or have a similar significant impact on you, unless you have given us your consent, it is necessary for a contract between you and us, or is otherwise permitted by law. You also have certain rights to challenge decisions made about you.

We do not currently carry out any automated decision-making, however we wish to advise you of all your rights even if they are not presently relevant to the data processing BCWA carries out. Please note, some of these rights only apply in certain circumstances and we may not be able to fulfil every request. If we are unable to fulfil your request, then we will inform you as to the reason why.

## **10. Cookies**

'Cookie' is a name for a small file, usually of letters and numbers, which is downloaded onto your computer, mobile phone or tablet when you visit a website.

These small files let websites recognize your device, so that the sites can work more effectively, and also gather information about how you use the site. A cookie, by itself, cannot be used to identify you.

### How we use cookies

We use cookies to distinguish you from other users of our website. This helps us to provide you with a good experience when you come to our website and also allows us to improve the user experience.

We use the categorization of cookies set out by the International Chamber of Commerce in their UK Cookie Guide. We use all four categories of cookies:

- Strictly necessary cookies are essential for you to move around our website and to use its features.
- Performance cookies collect anonymous information about how you use our site, like which pages are visited most.

- Functionality cookies collect anonymous information that remembers choices you make to improve your experience, like your text size or location. They may also be used to provide services you have asked for.
- No cookies, please: You can opt out or reject cookies by setting up your Web browser with your preferences. Find out how to control and delete cookies in your browser. If you choose to refuse all cookies, our website may not function for you as we would like it to. If you have any questions about how we use cookies, please contact the BCWA as noted above.

To find out more about this policy and how we look after your personal information, you may contact us at [bcwapresident@gmail.com](mailto:bcwapresident@gmail.com)