



Westway Trust Privacy Policy (Marketing and Digital Communications)

This Privacy Policy relates to customer/service all personal user data processed and stored by Westway Trust (WT). It includes data captured on our website, www.westway.org

Westway Trust is the data controller and is registered with the Information Commissioner's Office. This Privacy Policy informs customers and users about the collection, use and sharing of personal information which we collect on our websites, on our estate and through the various services we offer.

This Privacy Policy is designed to protect you, our users, by informing you how personal information is collected, how we look after that information and with whom we share it. Quick links have been provided to help you find the section you wish to read.

WT is committed to complying with the Data Protection Act 1998, the General Data Protection Regulation (GDPR) from 25 May 2018 and The Privacy and Electronic Communications (EC Directive) Regulations 2003. By using our website, our properties and services, you are consenting to us processing your information in the ways stated here.

What information do we collect and why?

The basis on which we collect and process your data is usually through *consent*. Sometimes there is a *contractual* reason such as being able to process a monthly direct debit payment. We may also process your data based on our legitimate business interests for example in order to operate and improve our business.

The information we collect may include any of the following:

- **Any personal details you give us or we obtain from third parties.**

Information you type into our websites or provide to WT staff in the course of delivering services. This information may include your personal contact data (eg name, email address, postcode etc). We use this to provide you with the services you request, tell you about services you are eligible for, to keep in contact with you, manage your account and the services we provide. If you contact us by email, via the website, in person or by telephone, we may keep a record of your contact information and enquiry and may subsequently use your contact details to respond to your enquiry.

- **Information about website visits including IP address.**

- **The IP address is your computer's individual identification number**

We may use your IP address to capture information about website visits so we can learn more about how our customers use the website in order to find ways to improve the website and our products and services for your benefit. Please see our Cookies Policy for more information.

- **Customer feedback**

We will record customer comments and surveys about how we are performing.

- **Other Sensitive data**

We are sometimes required to collect information about your ethnicity and other sensitive data in order to provide aggregated reports to your local authority or commissioning group. This information is used only for statistical purposes and is always kept secure. If you prefer not to provide us with this data, we will not hold this data.

- **Your communications preferences.**

We keep a record of any permissions and preferences you give us about what types of communication you are happy to receive from us.



How do we use your information?

We use your information to help us provide and improve our services for you. We may use your information in the following ways.

- to provide you with any services that you have purchased or receive free as part of a health or other scheme
- to check your identity
- to check your eligibility where appropriate
- to update our records with any new information you give us
- to notify you if we will be unable to provide a service you have booked before
- to provide marketing communications (if you have given us your permission)
- for research and analysis so we can develop and improve our services for your benefit
- to tailor our communications to you to ensure relevance (if you do not want us to do this, please contact us using the details below)
- to comply with legal requirements
- to safeguard users of our services

Data relating to children

Our services are used by people of all ages. WT may accept website registrations and collect personal information from individuals under the age of 13. If you are under 13, we do not allow you to post information about yourself in any WT forums or community areas. WT accepts no liability if this instruction is ignored.

Children aged under 13 years must have a parent or guardian's consent before providing personal information to us. We do not wish to collect any personal information without this consent.

How do we store and protect your personal information?

These are the basic guidelines we use to look after your personal data.

- We maintain secure systems to protect your personal information
- We respect your wishes about how we contact you, whether by post, telephone, email or text message
- We will update your information or preferences promptly when you ask us to
- We will respond fully to requests from you to see the information that we hold on you.
- We will not hold your personal information for longer than is necessary for our legitimate business purposes.
- We follow strict procedures when storing or handling information that you have given us. Staff at WT have received training in GDPR compliance.
- We will never sell your personal information to a third party.

WT reserves the right to store and process information securely outside of the European Economic Area ("EEA").

Updated: 18 November 2019



Retention Policy

We retain personal information as long as we consider it useful to contact you, or as needed to comply with our legal obligations. Where data is not needed for legal or statutory purposes, we will delete this information if you request. See the contacts section to request your data to be deleted.

Services provided by contracted third parties

WT may share information with third party organisations that provide specific services on our behalf which enhance our products and your experience with us. These organisations act as a Data Processor under our instructions. They may process data securely outside of the EEA. There is a contract in place with each third party which includes strict terms and conditions to protect your privacy.

Links to other websites

Our websites may contain links to and from external websites, advertisers and affiliates. If you follow a link to other sites, please note that these will be governed by their own privacy policies. We cannot accept liability for data use on those websites.

Marketing Partners

WT will never sell your personal information to any third party for marketing or other purposes.

In some cases, WT works in partnership with another organisation to provide services to you. In these cases, the partner may contact you for marketing purposes if you have given the partner organisation your permission to do so. WT partners who fall into this category are:

- Everyone Active, the operator of the sports facilities on the Westway estate.
- Supplement Schools
- Adult Learning partners

Keeping you updated

We may from time to time contact you about our services or products we think you might find interesting by email, by post, or telephone, but only if you have given us your permission to do so.

If you do not want us to contact you other than for service emails, please let us know when you next visit us or contact us using the details below. You may also opt-out of email or any other communications from us by contacting the support team at datacontroller@westway.org or by letting us know at our office at 1 Thorpe Close, London W10 5XL.

Your rights to manage your personal data

Individuals have certain rights over their personal data and data controllers are responsible for fulfilling these rights as follows:

- Individuals may request access to their personal data held by us as a data controller.
- Individuals may request us to rectify personal data submitted to us or, where appropriate, contact us via the relevant website registration page or by amending the personal details held on relevant applications with which they registered.
- Individuals may request that we erase their personal data
- Where we process personal data based on consent, individuals may withdraw their consent at any time by contacting us or clicking on the unsubscribe link in an email received from us.



- Individuals may have other rights to restrict or object to our processing of personal data and the right to data portability.
- Individuals may request information about, or human intervention into, any automated data processing that we may undertake.

If you wish to exercise any of these rights, please send an email to datacontroller@westway.org.

Note that where we are required to hold your data for legitimate business reasons, such as to be able to provide you with services you have requested, your rights may be restricted to the correction of that data.

Accuracy of data

We will always try to ensure the data we hold about you is accurate and relevant. If you believe the information we hold about you is out of date or incorrect, please tell a member of staff or see the contacting us section below. You will need to present a form of identification to request any changes.

Seeing your data – subject access request

The Data Protection Act 1998 and the General Data Protection Regulation give you the right to know what personal information we hold about you. This is called a Subject Access Request. If you would like to make a request, you should write to the Data Controller – see contacting us section.

Removing your data

If you no longer use our services and products and wish us to delete your personal data from our records, we will do this if there are no legal or statutory regulations requiring us to keep this information. please write to the Data Controller – see contacting us section.

Restricting processing

You can contact us using the details below to restrict the processing of your data including some processing we do under legitimate business interests.

Transferring your data

In some circumstances you can ask us to transfer your information to another organisation.

Complaints about how we manage your data

If you are not happy about the way we manage your data, please contact us as quickly as possible by contacting your centre or usual contacts for providing our service. You may also write to the Data Controller – who will investigate your complaint and get back to you as soon as possible.

Information Commissioner's Office (ICO)

The ICO is the UK's independent authority set up to uphold information rights. You have the right to contact them should you wish. Details can be found on their website: <https://ico.org.uk/>

Changes to this privacy policy

This policy may be updated from time to time on this page. If you have any questions or comments about our Privacy Policy or how we use your personal information please contact us at datacontroller@westway.org



Contacting us

1 Thorpe Close, London W10 5XL

You can also contact us through our contacts pages on our website, www.westway.org

Alternatively, you can write or email our Data Controller datacontroller@westway.org