

Third Sector Support Wales Privacy Notice

1. Introduction

Third Sector Support Wales (**TSSW**, referred to in this notice collectively as **we, our** or **us**) is committed to protecting your privacy. This privacy notice (**Privacy Notice**) explains how the members of TSSW collect and process personal data.

This Privacy Notice also explains how the members of TSSW will share and use personal data, and for what purposes. This includes the databases we manage (**Databases**) and the personal data contained within them.

This Privacy Notice is intended for any individuals whose personal data is contained in the Databases for use by members of TSSW.

We may update this Privacy Notice from time to time.

2. Who is TSSW?

TSSW is a collaboration between Wales Council for Voluntary Action (**WCVA**) and the County Voluntary Councils (**CVCs**). Our shared goal is to enable the third sector and volunteers across Wales to contribute fully to individual and community well-being, now and for the future.

A full list of our current members is available [here](#).

The following platforms, services and associated Application Programming Interfaces (API) will use your personal data in accordance with this Privacy Notice:

- Client Relationship Management (**CRM**)
- Funding Wales
- infoengine
- Knowledge Hub
- Third Sector Support Wales
- Volunteering Wales

3. Personal Data

Personal data means any information about an individual from which that person can be identified. It does not include data where an individual cannot be identified (anonymous data).

We may collect, use, store and transfer different kinds of personal data. If you would like to see how your personal information is used, including for specific services, please refer to the **Using your personal data** section at the bottom of this Privacy Notice.

Databases

The Databases enable us to manage our communications with people and organisations that wish to hear from us. Using the personal data in the Databases we can send communications that we think will be of interest to you by email, phone, SMS, post, social media and other digital channels. The use of the Databases avoids unnecessary duplication and enables you to manage the communications you receive from TSSW or its members.

We also use the Databases to provide insights and analysis. This helps us to:

- Continually improve the effectiveness of our communications.
- Develop the products and services we offer our member organisations.

- Monitor the reach of our communications and the diversity of the recipients.
- Provide reports to funders and regulators.

Third-party marketing

We will get your express opt-in consent before we share your personal data with any third party for marketing purposes.

Opting out

You can ask us or third parties to stop sending you marketing messages at any time by following the opt-out links on any marketing message sent to you or by contacting us. Where you opt out of receiving these marketing messages, this will not apply to personal data provided to us as a result of, and the purpose of, receiving our services.

If you fail to provide personal data

Where we need to collect personal data by law, or under the terms of a contract we have with you, and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with services). In this case, we may have to cancel a service you have with us but we will notify you if this is the case at the time.

4. How does TSSW collect Personal Data?

We use different methods to collect data from and about you, including through:

Direct interactions. You may give us your personal data when you directly interact with us, whether in person or online.

Automated technologies or interactions. As you interact with our website, we will automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies and other similar technologies.

Third parties. We may receive personal data about you from various organisations that are members or have an association with us. For example, you may work or volunteer for one of these organisations and the organisation has passed your details to us.

5. Disclosures of your Personal Data

We may share your personal data with the following third-parties:

- Service providers - we use some third-party providers to help us run our organisations, such as service providers who provide IT and system administration systems, or evaluators to assess our Databases and systems.
- Professional advisers including lawyers, bankers, auditors and insurers who provide consultancy, banking, legal, insurance and accounting services.
- Tax authorities who require reporting of processing activities in certain circumstances.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

Reports

We may produce reports from the Databases and share these with the Welsh Government, local authorities, health boards, the Charity Commission and similar organisations as required. These reports may also be published.

The reports are prepared using Aggregated Data (as defined further in this Privacy Notice). Your personal information is not provided for the purpose of producing a report and we will not share your personal information with these bodies. The TSSW members may appoint an external researcher to help us with this work, who would have access to the Aggregated Data contained in the Databases.

6. Data Security

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to TSSW members, employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

7. Data Retention

We will only retain your personal data for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

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, regulatory, tax, accounting or other requirements.

In some circumstances you can ask us to delete your personal data: please see your legal rights below for further information.

8. Data controller

Although the Databases are managed by WCVA, the information in the Databases is held on behalf of all the members of TSSW. We are joint data controllers of the personal data contained in the Databases.

We have entered into a Memorandum of Understanding (**MOU**) that governs our relationship in connection with the Databases and services. Each TSSW member that has signed up to the MOU has appointed a contact who is responsible for any personal data shared under the MOU, and compliance with the MOU.

9. Legal basis of processing

We will only use your personal data when UK data protection law allows us to. Most commonly, we process your personal data for the purposes described in this Privacy Notice, based on the following legal grounds:

- Where we need to perform the contract we are about to enter into or have entered into with you (such as providing services to you).

- Where it is necessary for our (or a third party's) legitimate interests, and they do not override your interests and fundamental rights. For example, improving our services to meet the needs of our clients.
- Where we need to comply with a legal obligation. For example, legal obligations sometimes require us to retain certain information.

10. Your Legal Rights

Under certain circumstances, you have the right to:

- **Request access** to your personal data (commonly known as a **subject access request**). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.
- **Request correction** of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.
- **Request erasure** of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law.
- **Object to processing** of your personal data where 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 as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes.
- **Request restriction of processing** of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios:
 - If you want us to establish the data's accuracy.
 - Where our use of the data is unlawful but you do not want us to erase it.
 - Where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims.
 - You have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.
- **Request the transfer** of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.
- **Withdraw consent at any time** where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain services to you. We will advise you if this is the case at the time you withdraw your consent.

If you wish to exercise any of the rights set out above, please contact us.

No fee usually required

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we could refuse to comply with your request in these circumstances.

What we may need from you

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). 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.

Time limit to respond

We try to respond to all legitimate requests within one month. Occasionally it could 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.

Complaints

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues (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.

11. How to Contact us

We hope this Privacy Notice has been helpful in terms of how we use personal data and your rights in relation to such personal data. If you have any questions, please contact us:

- Email us at dpo@wcva.cymru.
- Write to us at Wales Council for Voluntary Action, One Canal Parade, Dumballs Road, Cardiff CF10 5BF.

Using your personal data

We have grouped together the personal data we use as follows:

- **Identity Data** includes first name, maiden name, last name, date of birth, job title and organisation name.
- **Contact Data** includes billing address, personal email address, business email address and telephone numbers.
- **Sensitive Data** includes gender, racial or ethnic origin, and health conditions
- **Technical Data** includes internet protocol (IP) address, your login data, and other technology information on the devices you use to access any TSSW services.
- **Usage Data** includes information about how you use our website and services.

We also collect, use and share **Aggregated Data** such as statistical or demographic data for any purpose. Aggregated Data can be derived from personal data but is not considered personal data in law as this data will not directly or indirectly reveal an identity. However, if we combine or connect Aggregated Data with personal data so that it can directly or indirectly identify a person, we treat the combined data as personal data. This would be used in accordance with this Privacy Notice.

Purposes for which we will use your personal data – all platforms and services

We have set out below a description of all the ways we may use your personal data.

Purpose/Activity	Type of data
To register you as a user, volunteer, or your account	(a) Identity (b) Contact
To aggregate your personal data for evaluation and analytics reporting	(a) Identity (b) Sensitive (c) Contact
To process and manage payments	(a) Identity (b) Contact
To manage our relationship with you which will include: (a) Notifying you about changes to our terms (b) Asking you to leave a review or take a survey (c) Accommodating for any specific requirements you may have	(a) Identity (b) Sensitive (c) Contact
To administer and protect our business, our websites, and systems that we use to provide our services to you (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	(a) Identity (b) Contact (c) Technical
To deliver relevant website content to you	(a) Identity (b) Contact

	(d) Usage (e) Technical
To use data analytics to improve our website, services, marketing, client relationships and experiences	(a) Technical (b) Usage
To make suggestions and recommendations to you about services that may be of interest to you	(a) Identity (b) Contact (c) Technical (d) Usage
To process and manage the membership schemes you have with any of the TSSW members	(a) Identity (b) Contact

Appointed Subprocessors

Purpose of Processing	Appointed Subprocessors
Hosting providers	SalesForce Third Eye Vision (3EV) Ipswich Software Limited

Specific services & platforms

The following portals and services use personal information, either provided by you or from the Database, to deliver their services to you, or for their own individual requirements:

- Client Relationship Management (CRM)
- infoengine

You can find further information for each platform and service below.

Client Relationship Management (CRM)

Personal information is processed when you make an enquiry with us (Interaction) for the purposes of recording the interaction and for reporting purposes. If you book on to an event then your personal information is used for managing the event and for reporting purposes.

infoengine

Personal information is processed when you use the infoengine website to create a shortlist. We will then ask you for an email address, so that we can send you updates to your shortlist. It is necessary for us to keep this information in order to deliver this update service.

If you decide that you no longer want to receive updates to your shortlist, please contact infoengine@pavo.org.uk or write to: infoengine, PAVO, Unit 30, Ddole Road Industrial Estate, Llandrindod Wells, Powys, LD1 6DF, and we will remove your contact details from the system.