



WIMBLE**TECH** CIC
work.life.balanced

Membership Privacy Policy

Version 2.0 Oct 2020



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[#thepoweristhenetwork](#)
[#togetherwearestronger](#)

Wimbletech Community Interest Company, trading under the brands Wimbletech CIC, Rivertech & The Workary are committed to ensuring your privacy is protected.

Wimbletech is the data controller and we are responsible for your personal data (referred to as “we”, “us” or “our” in this Privacy Policy). By providing us with your data, you warrant to us that you are over 16 years of age.

Should we ask you to provide certain information by which you can be identified when using our Services or website, we will only use this information in accordance with our stated Privacy Policy.

This Privacy Policy provides you with details of how we collect and process your data through your use of our website <https://wimbletech.com> and Membership Services including any information you may provide through our signing up process. The Services referenced in this Policy include the Services provided by the Wimbletech CIC.

We want to help you achieve a work-life balance, through our Services. Before you use our Services, please read this Policy in its entirety, to help you make informed decisions about your relationship with us.

Contact Details Full name of legal entity: Wimbletech CIC

Email address: privacy@wimbletech.com Postal address: Wimbledon Reference Library, Wimbledon Hill Rd, Wimbledon, London SW19 7NB

If you are not happy with any aspect of how we collect and use your data, you have the right to complain to the Information Commissioner’s Office (ICO), the UK supervisory authority for data protection issues (www.ico.org.uk). We should be grateful if you would contact us first if you do have a complaint so that we can try to resolve it for you.

2. DATA WE COLLECT

The Information and Personal Data that we collect and our use of that Information depends on your relationship with us and the requirements of applicable law as described below.

We collect information:

- ❖ that you provide to us directly.
- ❖ about your devices and their location, and your use of our Services, including through cookies, pixels, web beacons, logs, and other Internet technologies. For more information about these technologies, please see our [Cookie Policy](#);
- ❖ if you opt-in to certain features, or depending on your device settings, we obtain geo-location data and information about your contacts; and
- ❖ that we obtain from other sources.

Personal data means any information capable of identifying an individual. It does not include anonymised data. We may process certain types of personal data about you as part of your member life-cycle as follows:

- ❖ Identity Data: may include your first name, last name and title.
- ❖ Contact Data: may include your billing address, postal address, phone number and email address.
- ❖ Professional Information: including your company name, role, type of business, income and other information about your profession;
- ❖ Payment and Transaction Data: may include details about payments between us and other details of purchases made by you.
- ❖ Profile Data: may include your photo, video-selfie, your interests, preferences, feedback and survey responses.
- ❖ Usage Data: may include information about how you use our website and member portal, products and Services.
- ❖ Marketing and Communications Data: may include your preferences in receiving marketing communications from us and any other information that you intentionally share, send, or receive using the Services, including your e-mail, SMS, Slack, requests made through automated chatbots, or similar technology, calendar invitations, and any other information you choose to share with us — including your photos, videos, blog entries, interests, hobbies, lifestyle choices, and groups with which you are affiliated — and that you send or receive using the Services;

3. HOW WE COLLECT DATA

We collect information and data through a variety of different methods including:

Direct interactions: You may provide data by using our Services and filling in forms on our website (or otherwise) or by communicating with us by post, phone, email or otherwise, including when you:

- ❖ sign up to our Services;
- ❖ subscribe to our Services or newsletters;
- ❖ request resources or marketing be sent to you;
- ❖ enter a promotion or survey; or provide us feedback

Third parties or publicly available sources: We may receive personal data about you from various third parties and public sources as set out below:

technical data from the following parties:

- analytics providers such as Google based outside the EU;
- advertising networks such as Facebook based outside the EU;
- search information providers such as Google based outside the EU;
- contact, financial and transaction data from providers of technical, payment and delivery Services such as GoCardless and ChargeBee based outside the EU;
- Software and email automation providers such as Active Campaign based outside the EU;

ANONYMOUS, AGGREGATED AND OTHER INFORMATION

We may also process Aggregated Data from your personal data but this data does not reveal your identity and as such in itself is not personal data. An example of this is where we review your Usage Data to work out the percentage of website users using a specific feature of our site or Services. If we link the Aggregated Data with your personal data so that you can be identified from it, then it is treated as personal data.

4. HOW YOUR DATA MAY BE USED

We will only use your data when legally permitted. The most common uses of your data are:

- ❖ To communicate and provide our Service and products to you as part of our member life-cycle
- ❖ To help improve our sites & Services
- ❖ To inform you of upcoming promotions, events, partnerships that we think you may be interested in
- ❖ For our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests
- ❖ Protect against fraud, abuse, or harm and otherwise provide a Secure Environment (“Secure Environment” as used in this Policy means both physical and online environments);
- ❖ Where we need to comply with a legal or regulatory obligation

5. DISCLOSURE OF YOUR DATA

We may have to share your personal data with the parties set out below for the purposes set out in section 3 above:

- ❖ Among the employees and contractors of Wimbletech CIC
- ❖ Third-party service providers for example who provide IT and system administration to perform a variety of services on our behalf. We take steps to ensure that these service providers act only in line with our instructions and on our behalf, or otherwise use Personal Information as described in this Policy. We require all third parties to whom we transfer your data to respect the security of your personal data and to treat it in accordance with the law. We only allow such third parties to process your personal data for specified purposes and in accordance with our instructions.

- ❖ Professional advisers including lawyers, bankers, auditors and insurers who provide consultancy, banking, legal, insurance and accounting services
- ❖ Our Community. Our Services include online and offline member communities, forums, networks, and other features through which you may share information and connect with others. This includes:
 - Our Services include member networks, online chat facilities, forums, and/or other groups available to users. Remember that anyone can read, collect, or use your postings on a network or forum or in a chat room or group and we cannot be responsible for any unauthorised third party's use of information that you publicly disclose online.
 - We foster our community by creating profiles for members or permitting members to create their own profiles on member networks or forums. Typically, such a profile contains your name, the name of your company, and other information you provide or add to your profile (photo, video selfie, content, comments, photos, etc.). Depending on the Services you use, this profile might be created automatically and be accessible to other members of the network or forum. The Wimbletech CIC profile information is accessible to all Members.
 - We also may share information about you with others in the community to provide you with certain features. For example, if you sign up for a workshop, presenters' program or mentoring program, we may share information about you with potential mentors
- ❖ Social Media. We are active on social media (e.g., Twitter, Facebook, etc.) and share information, images, and video with the public through unaffiliated external social media sites. We encourage you to read their policies. Remember that the social media sites are public, which means that anyone can see your posts, and your posts may even show up in search engine results

While we will not edit comments, we may delete a comment from our page on a social media site if it, for example, does not relate to the post, promotes a commercial product or service, uses obscene, threatening, or harassing language, or if it is a personal attack or hate speech that targets or disparages any ethnic, racial, age, or religious group (or other legally protected group), or if it advocates illegal activity or violates copyright laws.

6. DATA SECURITY

The security of all Personal Information provided to Wimbletech CIC is important to us. We take reasonable steps endeavoring to use appropriate technical or organizational measures to protect your Personal Information, including against unauthorized or unlawful processing and accidental loss, destruction, or damage.

Unfortunately, no data transmission over the Internet or storage of information can be guaranteed to be 100% secure. As a result, while we strive to protect your Personal Information, we cannot ensure or warrant the security of any information that you transmit to us, and you do so at your own risk. As such, we ask that you help us be safer together by implementing your own security controls, such as a strong password, not sharing your credentials or badge with others, logging out when you leave your desk, and other security best practices.

We limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know such data. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

7. STORING YOUR DATA

We will only keep your data for as long as you have a relationship with us, and for a period after your relationship with us has ended to fulfill the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

We also take into account the 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.

To determine the appropriate retention period for data, we take into account the time your data is required to:

- ❖ Continue to develop, tailor, upgrade, and improve our Services;
- ❖ Maintain business records for analysis and/or audit purposes;
- ❖ Comply with record retention requirements under the law;
- ❖ Defend or bring any existing or potential legal claims; or
- ❖ Address any complaints regarding the Services.

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

In some circumstances we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

Data that we collect may be transferred and stored outside of the European Union for the purpose of providing our service to you. By submitting your personal data, you agree to this transfer, storing or processing. We have taken steps to ensure that any data processors that we are using have their own privacy Policy and have made provisions for GDPR. We take the provision of safety and security of your data importantly and review and update measures where appropriate.

8. YOUR LEGAL RIGHTS & HOW TO CONTACT US

Under certain circumstances, you have rights under data protection laws in relation to your personal data. These include the right to:

- ❖ Request access to your personal data
- ❖ Request correction of your personal data
- ❖ Request erasure of your personal data
- ❖ Object to processing of your personal data.
- ❖ Request restriction of processing your personal data
- ❖ Request transfer of your personal data
- ❖ Right to withdraw consent

You can see more about these rights at:

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

You have a right to access the information held about you, if you'd like to request this information please contact us at privacy@wimbletech.com

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 may refuse to comply with your request in these circumstances.

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.

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.

9. COOKIES

Our website uses cookies to distinguish you from other users of the website. This helps us provide the best user experience and also allows us to improve our website. For detailed information regarding cookies please see our [Cookies Policy](#)

10. THIRD PARTY LINKS

Our website may include links to third-party websites, plug-ins and applications. 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.

11. CCTV

Wimbletech CIC's sites and facilities have CCTV installed to meet our legitimate business interests in protecting the safety of Wimbletech CIC's employees, members, and guests and their property. These recordings may be accessed by Wimbletech CIC. Wimbletech CIC's may also make CCTV footage available to members and other third parties authorized by Wimbletech CIC. These recordings may be shared with competent authorities in accordance with applicable laws, if required. The recordings are generally retained for a limited period of time, but may be kept longer where Wimbletech CIC or an applicable member determines that it is appropriate, for example in connection with the investigation of an incident, or when competent authorities request us to retain them.

12. CHANGES TO OUR PRIVACY POLICY

We may change or modify this Privacy Policy in the future. When we make material changes we will ensure to notify our members, either through sending to the email provided to us or by placing a notice on our website. We also would encourage our members to review our Privacy Policy from time to time. We will record the date of the latest Policy publication at the bottom of this page.

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose.

If we need to use your personal data for a purpose unrelated to the purpose for which we collected the data, we will notify you and we will explain the legal ground of processing.

We may process your personal data without your knowledge or consent where this is required or permitted by law.

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