

# Way Up Privacy Policy

## 1. Our commitment to your privacy

We are committed to keeping the personal details of our members safe. This policy explains how and why we use your personal data, to ensure that you remain informed and in control of your information.

Any references to 'Way Up', 'the Group', or to 'we' or 'us' refer to:

- An unincorporated association of individual persons, whose partners have died.
- Way Up is neither a business nor a charity.

We use three key definitions to describe people mentioned in this policy. These are definitions used by the Information Commissioner's Office (ICO), the UK's independent body set up to uphold information rights ([www.ico.org.uk](http://www.ico.org.uk))

- **'Data subject'**: this is you, one of our members and supporters. As the data subject, we respect your right to control your data.
- **'Data controller'**: this is us, Way Up. With your permission, we determine why and how your personal data is used (as outlined in this policy).
- **'Data processor'**: this is a person, or organisation, who processes your data on our behalf, with your permission. For example, this might be an internet hosting company who provide a platform for internet forum.

Information provided on application will only ever be used by Way Up. We will never pass on your details to any other organisation, unless we are legally required to. We will never sell your personal data.

## 2. Why do we collect your personal data?

We use your personal data to keep in touch with you.

We will only ever collect, store and use your personal data when we have an identified purpose and reason to do so. The ICO refers to this as a 'lawful basis'. Further information about why we collect your personal data is outlined below.

### **a) To administer your Way Up membership and the associated Facebook closed group membership**

We collect your personal data to administer your membership, which may involve:

- Sending you your membership welcome email when you first join us
- Sending you your membership renewal email
- Getting in touch should there ever be any issues with your membership or issues concerning the code of conduct.

## **b) To send you information regarding event bookings**

We collect your personal data to send you:

- information about events you have booked onto.

## **c) To send you information about our group and ask for your opinion**

We also collect your personal data so that we can send you information about activities that we feel will be of interest to you. From time to time, we may also use your personal data to ask for your opinion about our activities.

## **3. What kind of personal data do we collect? How do we collect it?**

### **a) Basic information**

We will usually collect basic information about you, including your name, age, gender, date of birth, postal address, email address and the date and cause of your bereavement on application. We may also collect information relating to screen names and additional email addresses you use.

Usually we collect this data from you directly, but we also obtain information, from external sources, for example published obituaries.

### **b) Getting to know you better**

We also collect information about you that helps us to get to know you better. This may include:

- information about your interests and family
- your contribution to the web forum
- records of events you've attended or organised

### **c) Sensitive personal data**

We do not normally collect or store sensitive personal data (such as information relating to health, beliefs or political affiliation) about members. However, there are some situations where this will occur.

When we do so, we will be very clear as to why we are collecting such information, and we will only do so with your specific consent and permission. In these situations, we collect the data from you directly.

If you are attending an event we may collect extra information about you, for example:

- details of emergency contacts
- medical conditions and dietary requirements

#### **d) Our website, our forum and the associated secret closed Facebook Group**

Our website is hosted by a third party and uses 'cookies' to help provide you with the best experience we can. Cookies are small text files that are placed on your computer or mobile phone when you browse websites.

Our cookies help to

- Make our website work as you'd expect
- Remember your settings during and between visits
- Improve the speed and security of the site
- Continuously improve our website for you

Facebook also has their own privacy policies which you can find on the information pages of the relevant internet sites.

### **4. How do we store your data?**

#### **a) Security**

All of the personal data we collect is processed by our volunteers in the UK. However, for the purposes of IT hosting and maintenance your information may be situated outside of the European Economic Area (EEA). This will be done in accordance with guidance issued by the Information Commissioner's Office.

Electronic data and databases are stored on secure computer systems and we control who has access to information (using both physical and electronic means). All volunteers who manage or process personal data receive data protection training.

#### **b) Data retention policy**

We will only use and store information for as long as it required for the purposes it was collected for.

### **5. Your rights**

Under the GDPR legislation, you have the following rights with regards to your personal information:

- the right to be informed about the collection and the use of their personal data
- the right to access personal data and supplementary information
- the right to have inaccurate personal data rectified, or completed if it is incomplete
- the right to erasure (to be forgotten) in certain circumstances
- the right to restrict processing in certain circumstances
- the right to data portability, which allows the data subject to obtain and reuse their personal data for their own purposes across different services
- the right to object to processing in certain circumstances

- rights in relation to automated decision making and profiling

Not all of these rights are relevant to an online forum such as Way Up. This Privacy Policy covers those that are.

Users understand that should they terminate their forum membership, or their membership be terminated by Way Up, their user name (but not their personal details) will remain visible to all other users unless anonymisation is specifically requested in accordance with GDPR at the time. All posts that an individual member has contributed to the forum will not be deleted as their removal would prejudice the purpose of Way Up. This is a permissible exemption to the right to erasure, and forms part of our Registration Agreement.

For more information on your individual rights, please see the [Information Commissioner's Office \(https://ico.org.uk/\)](https://ico.org.uk/)

## **6. Leaving our website by external links**

We are not responsible for the privacy practices or the content of any other websites linked to our website. If you have followed a link from this website to another website you may be supplying information to a third party.

Responsibility for GDPR compliance lies with the administrator of any other group not directly affiliated with Way Up.

## **7. Get in touch**

Should you wish to find out more about the information we hold about you, or about our privacy policy, please contact us: [help@way-up.co.uk](mailto:help@way-up.co.uk)

We update this policy periodically.  
Last updated: March 2022  
GMW