



PURPOSE OF THIS PRIVACY NOTICE

Who we are and what we do—We are Fighting With Pride, the UK’s only LGBT+ Military Charity supporting LGBT+ Veterans, serving personnel, and families. Launched in January 2020, Fighting With Pride (FWP) delivers transformational change through four key domains: Changing Policy, Building Community, Capacity Building Support, and Research and Archive.

This privacy notice is issued on behalf of Fighting With Pride. When we mention “We”, “Us” or “Our” in this privacy notice, we are referring to the relevant charity that is responsible for processing your data.

The Trustees for Fighting With Pride are the data controllers and are responsible for general data protection matters and complaints arising from day-to-day matters.

We have appointed a data protection lead who is responsible for overseeing questions about this privacy notice,

This privacy notice aims to inform you how Fighting With Pride collects and processes your personal data, which either you have provided to Us, or we obtain. This notice applies to the personal information We collect about you directly or that We collect from third parties. It sets out:

- what information We collect, and from whom;
- how we use that information
- who we share your information with;
- how your information is protected;
- your rights about the information We hold about you and
- how long we keep your information.

This website is not intended for children, and We do not knowingly collect data relating to children.

Our Site is owned and operated by Fighting With Pride.

Queries related to Data Protection should be directed to the Data Protection Lead (see the section “How to Contact Us”)

What Data Do We Collect?

We collect personal information you give Us when you:

- Contact details such as name, address, email address, and phone numbers
- Date of birth
- Gender
- Information you provide when you correspond with Us
- Financial information that you provide to Us
- Order products and services from Us
- Use our products, services and website
- Provide a testimonial or a review on Our website
- Communicate with or contact Us
- Enter into any of Our competitions, promotions or surveys
- Interact with Us on social media platforms
- Sign up for one of Our newsletters or other communications
- Request a call back through Our websites
- Communicate with Our Community teams using the information collected to identify, provide, or help shape the best support and raise awareness to create better-informed services and inclusion.
- Signing up for the Pride in Veterans Standard (PiVS) programme
- Our Research teams, through information collected to evidence past treatment and its consequences, build better inclusive care services and bring to light military LGBT+ history.

Where We request information from you, this will be explained in the relevant forms or pages or over the telephone. You may choose to provide additional information when you interact with Us or to a third party who refers you to Us. We store customer feedback and information on our customer databases.

We will collect data you give us when applying for a job or volunteering with Us; this may include:

- your bank account details and tax and residency status
- references from previous employers or educational institutions
- contact details for you and any next of kin
- qualifications
- information concerning your health and medical conditions
- information about your race, ethnicity, and sexual orientation
- details of unspent criminal convictions.

Special category data

Where data processing relates to Special Categories of Data the following processing conditions apply:

- Explicit consent was obtained from the data subject.
- Processing is necessary for carrying out obligations under employment, social security or social protection law, or a collective agreement.
- We may collect your Health Data to facilitate accessibility arrangements or the provision of medical assistance.

Where we provide links to websites of other organisations, this privacy notice does not cover how that organisation processes personal information. We encourage you to read the privacy notices on the other websites you visit.


Social Media Users

We use social media channels (including Facebook, WhatsApp, Twitter, TikTok, and Instagram, the “Social Media Companies”) to publish information about the charity. If you follow or otherwise engage with our social media channels, we will collect Usage Data to analyse how users interact with those channels. If you use social media to send us messages or posts, we may use your Profile Data to communicate with you. When you interact with our channels, the social media companies will also process your personal data as joint controllers for the abovementioned purposes. For more information, we encourage you to review the privacy notices published by social media companies.

How Do We Use Your Data?

All personal data is stored securely in accordance with the DPA 2018 (the UK’s General Data Protection Regulation). We use your data to provide you with the best possible products and services.

This includes:

- Providing and managing your access to Our Site.
- To administer and manage our relationship with you, such as responding to  communications.
- Personalising and tailoring your experience on Our Site.
- Supplying Our products and services to you.
- Responding to communications from you.
- To send transactional and service messages about an event.
- Analysing your use of Our Site and gathering feedback will enable us to continually improve Our Site and your user experience.
- To comply with legal or regulatory requirements.
- To help us establish, exercise, or defend legal claims.

In some cases, data collection may be a statutory or contractual requirement, and We will be limited in the products and services We can provide you without your consent for Us to be able to use such data.

Newsletter

Supplying you with email newsletters, alerts, etc., that you have subscribed to (you may unsubscribe or opt-out at any time by clicking the 'unsubscribe' link in the email or by contacting Us (see the section on How to Contact Us)

Once you have submitted your preference to Us, we will use these for marketing purposes, including contacting you by email, telephone, or text message with information, news and offers on Our products and services. We will not, however, send you any unsolicited marketing or spam and will take all reasonable steps to ensure that We fully protect your rights and comply with Our obligations under the DPA 2018, GDPR, and the Privacy and Electronic Communications Regulations.

Lawful Basis

Under GDPR, we will ensure that your personal data is processed lawfully, fairly, and transparently without adversely affecting your rights. We will only process your personal data if at least one of the following bases applies:

- you have given consent to the processing of your personal data for one or more specific purposes.
- processing is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into a contract.
- processing is necessary for compliance with a legal obligation to which we are subject.
- processing is required for the purposes of the legitimate interests pursued by us or by a third party, except where such interests are overridden by the fundamental rights and freedoms of the data subject, which require the protection of personal data.

We rely on our legitimate interests for the following reasons:

- keeping Our records up to date;
- developing, marketing and charging for Our products and services;
- running our websites and keeping them safe and secure;
- presenting Our content and communications most effectively and sustainably for you and your devices;
- helping you use Our websites, including obtaining products or services;
- measuring how you use our websites and improving their content and accessibility;

- measuring and understanding how effective Our adverts are;
- complying with legal and or regulatory requirements;
- identifying consumer trends;
- understanding products, services and the consumer experience
- to provide insight and analysis into how our social media channels are used and how they are performing.

How do we Store and how long do we keep your data?

Personal data that we process for any purpose or purposes shall be kept for as long as is necessary for that purpose or those purposes.

Our retention of your personal data is linked to your actions. Unless a longer retention period is required or permitted by law, we will only hold your Personal Information on our systems for the period necessary to fulfil the purposes outlined in this Notice or until you request that the information be deleted (see the section "Summary of Your rights").

Sometimes, we may need to send your information to third parties outside the UK. By using our site and submitting information to us, you are deemed to accept and agree to this. If we store or transfer data outside the EEA, we will take all reasonable steps to ensure that your data is treated as safely and securely as it would be within the EEA and under the UK GDPR. Such steps may include but are not limited to, the use of legally binding contractual terms between us and any third parties.

Even if we delete your Personal Information, we reserve the right to retain your personal data where such retention is necessary for compliance with a Statutory obligation (for example, to maintain a copy for legal, tax, or regulatory purposes). In such event, we will do so only as long as necessary to fulfil those Statutory obligations.

How do we protect your data?

Data security is of great importance to us. To protect your data, we have put in place suitable physical, electronic, and managerial procedures to safeguard and secure data collected through Our Site.

All your data is stored electronically in a secure database or a locked filing cabinet and can only be accessed by authorised people. All users of Our system are trained in GDPR.

Where we engage third parties to process personal data on our behalf, they do so upon writing and are contracted to implement appropriate technical and organisational measures to ensure data security.

How Do We Share Your Data?

We are committed to not sharing your data. We will only do this if it is in your legitimate interest to ensure we provide you with the support and information required to make an informed decision about a service(s) or product(s).

We will not sell your data to any unconnected third parties.

We may contract with third parties to supply products and services to you on Our behalf. These may include payment processing, delivery of goods, search engine facilities, advertising, and marketing.

We might share your information across different parts of Fighting With Pride for research and analysis.

Third parties may sometimes require access to some or all of your data. Where any of your data is required for such a purpose, we will take all reasonable steps to ensure that your data is handled safely, securely, and in accordance with your rights, our obligations, and the obligations of the third party under the law.

We currently contract with:

Third party name	Used to	Privacy notice
Monday.Com	Contact Forms, Staff Details	https://monday.com/l/privacy/privacy-policy/
Eventbrite	Registration for regional events	https://www.eventbrite.co.uk/help/en-gb/articles/460838/eventbrite-privacy-policy/
CAF Bank	Donation-Card payment	https://www.cafonline.org/privacy
Wave	Finance	https://www.waveapps.com/legal/privacy-policy
MS365	Document Storage	https://privacy.microsoft.com/en-gb/privacystatement

We may also have to share your personal data with the parties below.

- Professional advisers, including lawyers, bankers, auditors and insurers based in the UK, who provide legal, consultancy, banking, insurance and accounting services.
- HM Revenue & Customs, regulators and other authorities based in the United Kingdom who require reporting of processing activities in certain circumstances.
- We may share your personal information where we need to, where someone's life is at risk, or we are required to do so by law.

- Sell any or all of our business or assets, or we buy another business or assets, in which case we may disclose your personal data to the prospective buyer or seller.

International transfers of personal data

We may need to transfer some personal data to the third parties described above who are located outside of the UK. In such cases, we will take appropriate measures to ensure your personal data remains protected. If the organisation is based outside of the UK and in a country that is not protected by an adequacy decision (providing an adequate level of data protection), we will take appropriate safeguards such as implementing the ICO's International Data Transfer Agreement (IDTA).

If you have any questions or need more information regarding international transfers of your personal data, please get in touch with us at dataprotection@fightingwithpride.org.uk

Automatic Collection, Cookies and aggregate information collected from our website

We, or the companies working for us, automatically collect some data from visitors to our websites. This includes what pages you have viewed, for how long and where you go on our website.

We use cookies to store information about how you use our sites. A cookie is a piece of data stored on a user's computer to remember information about you and create a profile of your viewing preferences. Your profile is used to tailor your visit to our website, make navigation more accessible, and direct you to information that best corresponds to your interests. We require your consent to place non-essential cookies on your device. You can change your cookie preferences by selecting the button in the bottom left corner from any page on our website. View our cookies policy here:

<https://www.fightingwithpride.org.uk/wp-content/uploads/2024/02/FWP-Cookie-Policy-Feb-2024-.pdf>

Information is also collected about how you arrived at our websites in the first place. This includes what links or adverts of ours you have viewed or clicked on to reach Us or any search terms you have used. Where you see a Fighting With Pride advert outside of Our website We, or an ad agency working for Us, may place a cookie on your browser. This is so that when you access Our website, we recognise that you have seen an advert for Ours elsewhere. If you have logged in, this includes your login details.

Aggregate information is collected from users using our own web tracker. This information includes users' Anonymised Internet Protocol (IP) addresses, browser type, internet service provider (ISP), referring/exit pages, platform type, date/time of visit, number of clicks, error

pages, and unique visits. This information is not linked to personal profiles or personally identifiable information provided by users. We use it to analyse visitor trends and use of our website, administer it, and gather broad demographic information of our website users.

How Can You Control Your Data?

When you submit information via Our Site, you may be able to opt out of receiving emails from us. You may do this by unsubscribing using the links provided in our emails or by emailing us.

You may access certain areas of Our Site without providing any data. However, to use all features and functions available on Our Site, you may be required to submit or allow the collection of certain data.

You may withdraw your consent for us to use your personal data at any time by contacting us, and we will delete your data from our systems. However, you acknowledge this may limit our ability to provide you with the best possible products and services (see the section on How to Contact Us).

Please let us know as soon as any of your contact details change so that we can keep our records current.

You can change how we contact you or the kind of material we send you at any time by contacting us by post or email using the contact details below.

Summary of Your Rights

As a data subject, you have several rights and control over how your data is used.

- You can request access to, deletion of, or correction of your personal data held by Us.
- You can ask for a copy of the data you have given Us.
- You can require Us to amend or change incorrect or incomplete data.
- You can require Us to delete or stop processing your data, where the data is no longer necessary for the purposes of processing.
- You can object to the processing of your data, where we rely on its legitimate interests as the legal ground for processing.
- You can ask Us to stop processing data for a period if the data is inaccurate or there is a dispute about whether your interests override the company's legitimate grounds for processing data.

To enforce any of the foregoing rights or if you have any other questions about Our Site or this Privacy Notice, please get in touch with Us using the details set out in the section “How to Contact Us”.

How to Contact Us

Should you have any questions about this statement or wish to make a complaint, please get in touch with us in writing, through our website Get in Touch (fightingwithpride.org.uk), or by emailing us at dataprotection@fightingwithpride.org.uk

Please ensure your query is clear, particularly if you request information about the data we hold about you.

How to complain

If you are unhappy with how we have processed or handled your data, please contact Us (see the section How to Contact Us).

If this does not resolve your complaint to your satisfaction, you have the right to lodge a complaint with the Information Commissioner’s Office (ICO). The ICO is the supervisory body authorised by the Data Protection Act 2018 to regulate the handling of personal data within the United Kingdom. The contact details for the Information Commissioner’s Office are:

Information Commissioner’s Office, Wycliffe House, Water Lane, Wilmslow, SK9 5AF

Telephone: 0303 123 1113 Website: <https://ico.org.uk/concerns/>

Changes to Our Privacy Notice

We may change this Privacy Notice as we deem necessary from time to time or as required by English law. Any changes will be immediately posted on Our Site, and you will be deemed to have accepted the terms of the Privacy Notice on your first use of Our Site following the alterations. We recommend that you check this page regularly to keep up to date.

Document last updated 14th March 2024