



Associated Country Women of the World

The Foundry, 17 Oval Way, London SE11 5RR
www.acww.org.uk | office@acww.org.uk | Registered CIO No.1174798

ACWW is an NGO in Special Consultative Status with ECOSOC
and an NGO in Associate Partnership with UNESCO
World President 2023-2026: Magdie de Kock

ACWW Data Protection Policy

Adopted by the Board of Trustees 4 February 2025

1. Introduction

This Data Protection Policy sets out how ACWW obtains, uses, and protects personal information and applies to all ACWW Members, Staff, the Board of Trustees, volunteers, contractors, and anyone working for or on behalf of ACWW. This Privacy Policy relates to information which is obtained by ACWW, and for which ACWW is the Data Controller (defined below). This means that ACWW sets the purpose for its use, and how the data will be used.

2. Who we are

ACWW is a registered charity in England and Wales (charity number 1174798). Our registered address is ACWW, The Foundry, 17 Oval Way, London SE11 5RR, UK.

Associated Country Women of the World (ACWW) is the largest rural women's organisation operating globally. ACWW has millions of members worldwide across 60 countries. ACWW works to bring together rural women and their organisations all over the world, and in so doing address the challenges they face as a result of the isolation of their communities, discrimination against women, and their lack of standing in political processes.

ACWW's membership spans 60 countries, and since 1947 we have passed more than 180 policy resolutions by popular vote. The key concept behind each of these is the empowerment of rural women in all their diversity. This continues to be our driving priority.

ACWW is considered a Data Controller, because we make the decision to collect and process data. We have the obligation to comply with UK data protection regulations and principles.

3. Why we hold and process supporters' personal data

There are a number of reasons why we hold the personal data of our members, supporters, and others who engage with us. These are:

- To keep a record of donations made and actions taken by our members and supporters, and our communications with them
- To send our members and supporters marketing information about our projects, fundraising activities and appeals where we have their consent or are otherwise allowed to.
- To support members and supporters in fundraising events.
- To record campaigning and advocacy actions by members and supporters.
- To support community based fundraising and campaigning.
- To claim Gift Aid on UK-based donations by UK taxpayers.
- To fulfil contractual obligations entered into with members or supporters – for example, online purchases or providing membership materials.
- To keep people safe, whether they are attending ACWW events or conferences, staff, or participants in ACWW organised activities.
- To comply with legal obligations.
- To manage our organisation.
- To ensure we do not send unwanted information to supporters, or members of the public who have informed us they do not wish to be contacted.



These reasons are underpinned by a “legal basis” under GDPR, the UK General Data Protection Regulation, “UK GDPR”. These are outlined in the following section.

4. Explaining the legal bases we rely on

UK GDPR sets out a number of different reasons for organisations like ACWW to collect and process your personal data. When collecting your personal data, we will always make clear to you which data is necessary for a particular purpose. It is important to note that all legal bases are considered equal under UK GDPR. For the avoidance of doubt, as ACWW is registered in England and Wales, and is governed by UK law, we apply the requirements of UK GDPR to all data collected and processed by ACWW.

5. Consent

Where we are relying on your consent, we will ensure that we provide a clear statement of the types of marketing you will receive and allow you to select only those channels by which you wish to hear from us.

For example, if you donate online, you will be asked if you would like to hear about our fundraising, projects, and general updates about ACWW activities. You will also be asked which channel(s) of communication you would like us to use (email, post, telephone).

6. Legitimate Interest

Where we are relying on Legitimate Interest we prioritise a transparent and balanced approach. Legitimate Interest enables us to process your personal data where we have concluded an assessment that it is in our Charitable interests to do so, and the processing does not materially impact on your rights and freedoms.

For example, when you join ACWW as a member, we will only apply legitimate interest where we have reason to believe you would be interested in hearing about our projects, fundraising activities, and international work. We will always provide a clear way to opt out of such marketing if you do not wish to receive it.

ACWW’s use of legitimate interest includes the following:

- Sending information, such as The Countrywoman magazine, and direct marketing information, to keep our Members updated on our projects, advocacy work, and fundraising activities. We will only do this where we have reason to believe that this information will be of interest, and we make it easy for you to opt out.
- To send you participation information for ACWW Conferences for which you have registered.
- We may analyse your previous support of ACWW in order to offer relevant ways of supporting ACWW in the future.
- To help identify businesses, Members or individual supporters who may wish to support ACWW, we may send emails to individuals where relevant to their job, for instance people working Corporate Social Responsibility.
- If your personal contact details have been provided as the point of contact for an ACWW Member Society.

For activities other than marketing, we may rely on different legal bases:



7. Legal Compliance

If the law requires us to, we may need to collect and process your data.

For example, where you sign up to the Gift Aid scheme, we will process your data for the purposes of submitting a Gift Aid claim to HMRC.

8. Public Interest

In limited situations we may use data in the public interest. It is likely to be in the public interest to collect data to prevent crime or dishonesty, ensure that we are fair in our practices by carrying out equality and diversity monitoring, or safeguard the wellbeing of people with whom we work.

9. When and why we will send you personalised marketing communications

ACWW will only contact you for marketing purposes – for example to keep you up to date on our work, or let you know of ways in which you can support that work – where we have your consent or we are otherwise allowed to do so.

We will make it easy for you to tell us if you would like to receive marketing communications from us and hear more about our work and the ways in which you would like to receive this information (post, email, phone). We will ask you to reconfirm your consent if we have evidence that suggests you may no longer wish to hear from us. We will not send you marketing material if you have told us that you do not wish to receive it. There are a variety of ways you can do this, highlighted below.

10. Other circumstances in which you may receive marketing information from ACWW – “Soft opt in”

This allows organisations to send marketing communications by email to individuals who have previously purchased similar goods and services (such as merchandise or membership), provided they were given the opportunity to opt out at the time of purchase. In ACWW’s case, this allows us to send marketing emails to previous customers of the ACWW online shop. We apply a 24-month time limit, and only communicate on this basis where you have made a purchase within this period. We will not use the “soft opt in” option if you have opted out of receiving email communications from ACWW.

11. When we collect information about you

ACWW may collect your personal data in the following circumstances:

a) When you give it to us DIRECTLY

You may give us your personal data directly when you make a donation, sign up for one of our events, take part in a campaign, volunteer at an event, purchase products from our online store, or when you communicate with us.

b) When you give it to us INDIRECTLY

You may give us your information indirectly when you submit a donation via an ACWW Member Society, or participate in a campaigning action with a partner or Member Society. These third parties will pass your data to ACWW where you have indicated that you wish to support ACWW and have given your consent, or if it is a necessary part of completing a contract with you.

Sometimes your personal data may be collected by an organisation working on our behalf (such as a professional fundraising agency or communications contractor) but as they are acting on our behalf we are the “data controller” and remain responsible for the security and proper processing of that data.

c) When you access ACWW’s Social Media

We might also obtain your personal data through the use of social media such as Facebook,

Twitter, or LinkedIn, depending on your settings or the privacy policies of these social media and messaging services. To change your settings on these services, please refer to their privacy notices, which will provide instructions and guidance on how to do this.

d) When the information is publicly available

We may also obtain personal data about individuals who may be interested in giving major gifts to charities or organisations like ACWW. In this scenario, ACWW may seek to find out more about these individuals, their interests and motivations for giving through publicly available information. This information may include newspaper or other media coverage, open postings on social media sites such as LinkedIn, and international donor directories. ACWW will not retain publicly available data relating to major donors without their consent, which will be sought at the earliest practical opportunity. Where we decide not to make contact, we will delete all personal data obtained, other than basic contact details, to which we will apply a suppression flag to ensure we do not make contact in the future.

We may also gather information if your activities relate to our work - for instance, if you are a public figure such as a Member of Parliament or you represent an organisation which we work with or which is related to one of our campaigns we may gather information about you in order to inform our campaigning and make decisions - for instance, whether we engage with you to seek your support for our work, ask your constituents to write to you, or choose to work with you in another way.

e) When we use Cookies

Cookies are a useful way for us to understand how supporters use our website. When you visit our website we may collect data from your computer or other device such as a smart phone or tablet through the use of "cookies". Cookies are created by your web browser when you visit our website. Every time you go back to the ACWW website, your browser will send the cookie file back to the website's server. They improve your experience of using our website, for example, by remembering your preference settings so that you are presented with information likely to be most relevant to you, and by measuring your use of the website to enable us to continuously improve our website to ensure that it meets your needs. Cookies can also be used to show you relevant ACWW content on social media services such as Facebook - these are known as "retargeting" or "advertising" cookies. For information on the types of cookies we use, how we use them and how you can control your cookie preferences, see our Cookie Policy.

If you visit our website as an anonymous visitor (e.g. you switch off cookies), ACWW may still collect certain information from your browser, such as the IP address (an IP address is a number that can uniquely identify a computer or other internet device).

The ACWW website contains hyperlinks to websites owned and operated by other organisations. These include other media organisations (such as the BBC), research organisations and think tanks (such as the Overseas Development Institute), our Conference partners (such as Ottawa Tourism), other related charities (such as Member Societies), and ACWW affiliates in other countries. These third-party websites have their own privacy policies, including policies on their use of cookies, and we urge you to review them. They will govern the use of personal information you submit or which is collected by cookies whilst visiting these websites. We cannot accept any responsibility or liability for the privacy practices of such third-party websites and your use of such websites is at your own risk.

12. What information might ACWW collect about you

We only collect personal data relevant to the type of interaction or transactions you have with ACWW.



Whatever your interaction with us this information will be minimal and linked to the purpose for which we need it.

For example, **when you contact ACWW** to make a donation, purchase an item online, support our Gift Aid scheme, take a campaign action, or sign up to any of ACWW's activities or online content (such as newsletters, competitions, or message boards) or you telephone, email, write to or text ACWW, or engage with ACWW via social media channels, we may receive and retain personal information.

In these cases we are likely to process details such as your name, email address, postal address, telephone or mobile number, bank account details to process donations and whether or not you are a UK taxpayer so that we can claim Gift Aid.

If you **participate in an event** we may (with your permission) take your photograph or video, or interview you.

If you **participate in market research or surveys**, we may ask you questions regarding your experience with us, or other survey questions relating to your experience.

If you are a **campaigner or work with our us on campaign activities**, we may collect information such as correspondence with you regarding campaigning, details of your background and activities with us or relating to the issue, the events you attend, or how we would like to work with you.

Where we gather information about you which is **publicly available** - for instance as **a major donor** or your views on our **campaigning activity** – this may include your name, contact details, views and positions you have expressed, and details regarding your circumstances- for instance which political roles you hold or what your background is.

13. Sensitive Personal Data

We only collect "sensitive personal data" about our members or supporters, e.g. health status, where there is a clear and specific reason for doing so, such as attendance in a Conference where this health status may be relevant to full participation. We collect this data where we need it to ensure that we provide appropriate facilities or support to enable you to participate in the event or carry out your role. Clear notices will be provided on application forms so that it is clear what information we need and why we need it. In certain circumstances, such as nominations for election to the Board of Trustees, we need to obtain information about criminal convictions (where these are unspent) in order to check that it is appropriate for you to undertake the role.

If you apply for a role with us, we may collect this data for equality monitoring. Further details regarding this are outlined in our recruitment policy.

All sensitive personal data is stored on a secure database, to which only a limited number of relevant staff have access. It is deleted when no longer relevant, is never shared with third parties, and is available to you at any point should you wish to see it.

14. How will ACWW use your personal data?

- a. For **Administrative reasons**, including:
 - "service administration", which means that ACWW may contact you for reasons related to administering any donations you have made, your tax status with regard to Gift Aid if claimed, the completion of membership, commercial, or other transactions you have entered into with ACWW or the activity or online content you have signed up for;

- to confirm receipt of donations (unless you have asked us not to do this), and to say thank you and provide details of how your donation might be used.
- in relation to correspondence you have entered into with us whether by letter, email, social media, message board or any other means, and to contact you about any content you provide;
- for internal record keeping so as to keep a record of your relationship with us;
- to provide logistical and fundraising information to people who are taking part in a fundraising event in aid of ACWW, such as Women Walk the World;
- to communicate with ACWW volunteers – to support you in your designated role or administer that role and our organisation;
- to keep your data up to date – for instance we use the Royal Mail's data on postal address changes to ensure that we can maintain contact with you where we believe you are happy to be contacted by post
- to implement any instructions you give us to with regard to withdrawing consent to send marketing information or informing us through the Fundraising Preference Service that you do not wish to receive any marketing information;
- to use IP addresses to identify the location of users, to block disruptive use and to establish the number of visits from different countries;
- to protect our staff and those with whom we work, or to prevent crime and dishonesty.

b. For **Marketing and fundraising reasons** as noted in point 9, “**When and why we will send you personalised marketing communications**”

c. For **Market research**

- to invite you to participate in surveys or research about ACWW or our work (participation is always voluntary);
- to analyse and improve the activities and content offered by the ACWW website to provide you with the most user-friendly navigation experience. We may also use and disclose information in aggregate (so that no individuals are identified) for marketing and strategic development purposes.

15. Will ACWW share your personal information with anyone else?

We will only use your information within ACWW for the purposes for which it was obtained. ACWW will not, under any circumstances, share or sell your personal data with any third party for their own marketing purposes, and you will not receive marketing from any other companies, charities or other organisations as a result of giving your details to us.

ACWW's suppliers

We may need to share your information with service providers who help us to deliver our projects, events, fundraising activities and appeals, for instance through conference catering, or distributing our magazine . These "data processors" will only act under our instruction and are subject to pre-contract scrutiny and contractual obligations containing strict data protection clauses. We do not allow these organisations to use your data for their own purposes or disclose it to other third parties without our consent and we will take all reasonable care to ensure that they keep your data secure.

Current and former ACWW employees

When you leave ACWW, ACWW may process your data to respond to requests for employment references.

Where legally required

We will also comply with legal requests where disclosure is required or permitted by law (for example to government bodies, statutory bodies, or law enforcement agencies for tax purposes, where it is in the public interest, or the prevention and detection of crime, subject to appropriate protection in law).



ACWW may transfer your personal data outside the UK. If it does so, this may occur under the protections of UK GDPR, but will otherwise only take place where appropriate standards and safeguards are in place.

Social Media

ACWW uses social media to promote our work. We have accounts on Facebook, X (Twitter), and LinkedIn. We may collect donations through Facebook Fundraisers and Facebook Donate and other channels. Where members of the public engage with our posts or publish content relevant to our work, we may like the posts, follow them, reply or write to them. We conduct research on what people say on public social media platforms to better understand how people feel about our sector and to improve our work. This research may be done by staff or companies we work with.

If you are a social media user, we will use social media tools as part of our relationship with you. These tools include the following:

- Facebook
- X (Twitter)
- Google
- LinkedIn

Through using these tools, we may provide your email address and/or phone number to the social media platform to allow them to identify your social media profile. You will then be shown advertising relating to ACWW which we think you will be interested in seeing. We will only share your data with social media platforms where you are already receiving marketing material from ACWW via post or email. The legal basis we apply to this activity is legitimate interest.

The social media platform will also use your profile to identify those with similar characteristics to you who we think may also be interested in finding out more about the work we do. These individuals will then be shown advertising about ACWW.

To prevent individual social media platforms from showing you advertising on this basis, please refer to the guidance they provide in their own privacy policies. The following links show how to do this for certain platforms:

Facebook: <https://www.facebook.com/help/568137493302217>

LinkedIn: <https://www.linkedin.com/help/linkedin/answer/62931>

X (Twitter): <https://business.twitter.com/en/help/troubleshooting/how-twitter-ads-work.html>

To prevent ACWW sharing your personal data with all social media platforms, please contact us at office@acww.org.uk to request this. Please note that while we will ensure that your data is not shared with social media platforms, this does not guarantee that you will not see ACWW advertising on those platforms. Some of the advertising is shared with broad categories of people, for instance based on age, location or interest groups. It will also not reduce the amount of advertising you will see in your social media feed.

16. How long will ACWW keep your personal information?

We will hold your personal information on our systems for as long as is necessary for the relevant activity, for example we will keep a record of donations subject to gift aid or other financial transactions for at least seven years to comply with HMRC (the UK government Revenue and Customs authority) rules.

If you request that we stop sending you marketing materials we will keep a record of your contact details and appropriate information to enable us to comply with your request not to be contacted by us.

Legacy income is vital to the running of the charity. We may keep data you provide to us indefinitely, to carry out legacy administration and communicate effectively with the families of people leaving us legacies. This also enables us to identify and analyse the source of legacy income we receive.

Where you contribute material to us, e.g. user generated content or in response to a particular campaign, we will only keep your content for as long as is reasonably required for the purpose(s) for which it was submitted unless otherwise stated at the point of generation.

17. How to control what we send you or request we update your personal information

The accuracy of your information is really important to us. We want to ensure that we are able to communicate with you in ways that you are happy with, and to provide you with information that is of interest.

If you wish to change how we communicate with you, or update the information we hold, then please contact us:

- Email us at office@acww.org.uk
- Write to us at: ACWW, The Foundry, 17 Oval Way, London SE11 5RR, UK
- Via our newsletter or web contact form

How long will it take for these changes to be effective?

We endeavour to meet the following service levels where supporters request we do not send them marketing information:

- Email – 3 business days from receipt of email
- Mail – 28 days from receipt of the ‘do not mail’ request. This period is longer than for other channels due to the production times for mailing campaigns, and in most cases we would expect the change to be effective much more quickly.
- If you request we stop marketing to you by completing our newsletter unsubscribe function or web contact form, it may take up to 10 days to complete your request due to the manual nature of this process.

18. How ACWW keeps your data safe

We ensure that there are appropriate technical controls in place to protect your personal details. For example, our online forms are always encrypted and our network is protected and routinely monitored.

We undertake regular reviews of who has access to information that we hold to ensure that your information is only accessible by appropriately trained staff, volunteers and contractors.

We use external companies to collect or process personal data on our behalf. We do comprehensive checks on these companies before we work with them, and put a contract in place that sets out our expectations and requirements, especially regarding how they manage the personal data they collect on our behalf, or have access to. We have a robust partner monitoring framework to ensure these contractual obligations are met.

These organisations - referred to as "Data Processors" also have legal liability for the way in which your data is used, providing you with additional protection.

19. ACWW's use of cookies

For information on the types of cookies we use, how we use them, and how you can control your cookie preferences, please read our Cookie Policy.

20. Your rights over your personal data

You have a variety of rights in respect of your data, including the rights to see, update, restrict, object to the use of or withdraw use of your data. In particular, depending upon why we hold your data, you may have the right to request:

- Access to the personal data we hold about you, including how we first obtained your details, free of charge in most cases (this is known as a 'Subject Access Request').
- The correction of your personal data when incorrect, out of date or incomplete.
- That we stop using your personal data for direct marketing (either through specific channels, or all channels).
- That we remove your personal data from our systems (this is known as the "Right to be Forgotten").
- That we no longer process your data automatically to decide whether particular marketing activities are likely to be of interest, or suggest an appropriate donation level based on your previous donation history. This is known as profiling, and helps us to ensure that our marketing is relevant and appropriate.

You can contact us to request to exercise these rights at any time, see point 17, **“How to control what we send you or request we update your personal information”**.

Opting out of Direct marketing

You have the right to stop the use of your personal data for direct marketing activity through all channels, or selected channels. We will always comply with your request.

Where we are sending you direct marketing on the basis of our legitimate interest, you can also ask us to stop. In the case of postal marketing sent on this basis, we will always comply with your request to opt out. Similarly, where we send email marketing on a soft opt in basis (see point 10. **“Other circumstances in which you may receive marketing information from ACWW – “Soft opt in”**), we will also comply with all requests to opt out.

Right to be Forgotten

Upon request we will remove your personal data from our systems, to the extent that we are permitted to by law or regulatory guidelines. For instance under HMRC rules we are required to retain financial data for 6 years for audit purposes, and so will not be able to delete donation details until this time period has elapsed.

Opting out of profiling

Upon request we will cease using your personal data to decide whether you would be interested in particular updates and other marketing. Such requests may lead to you not hearing from us in future.

Subject Access Requests

You have the right to request a copy of the personal information we hold about you. We will provide this as soon as possible, and within a month unless there are specific reasons why this would not be possible. We will always let you know if this is likely to be the case.

Checking your identity

To protect the confidentiality of your information, we will ask you to verify your identity before proceeding with any request you make under this Privacy Notice. If you have authorised a third party to submit a request on your behalf, we will ask them to prove they have your permission to act.

21. How to find out more, or make a complaint about ACWW’s approach to data protection

If you would like more information, to update your details or have any questions about this policy, please contact ACWW central office by email to office@acww.org.uk or write to us at: ACWW, The Foundry, 17 Oval Way, London SE11 5RR, UK.



To make a formal complaint about ACWW's approach to data protection or raise privacy concerns directly with our data protection team, please contact:

The Chief Privacy Officer
ACWW, The Foundry, 17 Oval Way, London SE11 5RR, UK.
Email: nick@acww.org.uk

If you feel that your data has not been handled correctly, or you are unhappy with our response to any requests you have made to us regarding the use of your personal data, you have the right to lodge a complaint with the Information Commissioner's Office.

You can contact them by calling **0303 123 1113**.
Or go online to www.ico.org.uk/concerns (opens in a new window; please note we can't be responsible for the content of external websites).

22. Changes to ACWW's Privacy Policy

This Privacy Policy may be updated from time to time so you may wish to check it each time you submit personal information to ACWW. The date of the most recent revisions will appear on this page. If you do not agree to these changes, please do not continue to use ACWW website to submit personal information to ACWW. If material changes are made to the Privacy Policy we will notify you by placing a prominent notice on the website.

Last review date:	15 th January 2025
Last updated on:	15 th January 2025
Author:	Chief Privacy Officer
Policy owner:	Executive Director
Approver:	Safeguarding and Data Protection Working Group and ACWW Board
Who does this policy apply to:	All ACWW Members, Staff, Board and Third Parties.