

**SCOTLAND WOMEN IN TECHNOLOGY PRIVACY POLICY**

This privacy policy explains how Scotland Women in Technology collects and processes your personal data including through your use of our website and any data you may provide when you sign up to receive news and updates from us or book to attend one of our events. **It is important that you read this privacy policy together with any other privacy policy or fair processing policy we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data.**

This privacy policy is provided in sections so you can scroll to the specific areas set out below.

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**Who we are:**

We are SWiT (known as Scotland Women in Technology), a Scottish Charitable Incorporated Organisation (SCIO) regulated by the Scottish Charity Regulator (OSCR), with Scottish Charity number SC049443. We are run by volunteers dedicated to Celebrating, Championing and Investing in female trailblazers across the technology industry.

SWiT is the controller and responsible for your personal data.

Questions, comments and requests regarding our use of your personal data are welcomed and should be emailed to: privacy@scotwomenintech.com.

**​How do we collect personal data from you?**

Personal data means any information about an individual from which that person can be identified, such as their name. It does not include data where the identity has been removed (anonymous data).

The personal data we collect from you will depend on your relationship with SWiT. We will collect personal data if you sign up to receive news and updates from us, if you attend or speak at any of our events, if you nominate someone for our Awards, if you are nominated for our Awards, if you act as a judge for our Awards, if you volunteer with SWiT or participate in our work, where we connect with you on a social media platform (in particular LinkedIn), and if you are our contact for partners, sponsors, suppliers, media, and government organisations who work with us. We also use cookies and collect data when you visit our website: [www.scotwomenintech.com](http://www.scotwomenintech.com).

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

* **Direct interactions** You may give us your personal details when you interact with SWiT, for example by filling in forms or by corresponding with us through the contacts page on our website, or by email, post, or phone, and when you apply to become a volunteer, sponsor, partner or to attend one of our events or if you participate in our work in other ways.
* **Automated technologies or interactions** We use strictly necessary cookies on our website to maintain security and manage the website. You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of our website may become inaccessible or not function properly. Please see our cookie policy for further details.
* **Public Information** We may collect your personal data from media reports or other information that you may make publicly available on your organisation’s websites or social media sites, in particular LinkedIn.
* **Third parties** We may collect your personal data from another person or organisation, for example if you are nominated for a SWiT award, or your details are provided to register you for an event. We ask all third parties to check that the individual concerned is happy for their personal data to be shared with us. If you discover that your personal data has been disclosed by a third party and you are not happy for your personal data to be shared with us, you should contact us at privacy@scotwomenintech.com.

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

* **Identity Data** includes first name, maiden name, last name, title, job description, career history and details of your interests/preferences.
* **Contact Data** includes billing address, delivery address, email address and telephone numbers.
* **Financial Information and Transaction Information** includes information collected based on payment taken to attend events or sponsorship details.
* **Technical Data** includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, and other technology on the devices you use to access this website.
* **Communications Data** includes your preferences in receiving communications from us and our third parties, including details about our events and information about our organisation.

If you are attending a SWiT event, you may choose to provide us with information on allergies and dietary requirements; this information is collected to protect your interests and is voluntarily provided by you.

Otherwise, we do not collect any other **Special Categories of Personal Data** about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, and genetic and biometric data). Nor do we collect any information about criminal convictions and offences.

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

* Where you have given your consent.
* Where we need to perform the contract we are about to enter into or have entered into with you.
* Where you have made information publicly available.
* Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
* Where we need to comply with a legal obligation.

**Purposes for which we use your personal data**

We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate. Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

| **Purpose/Activity** | **Type of data** | **Lawful basis for processing including basis of legitimate interest** |
| --- | --- | --- |
| When we contact you, or you contact us in connection with an event e.g. potential judges, speakers, partners and sponsors. | (a) Identity(b) Contact(c) Communications Data  | (a) Necessary for our legitimate interests (to promote our charitable aims and grow the organisation’s network)(b) Information made publicly available |
| To register you as a new follower, volunteer, judge, speaker, partner, sponsor; or to register your booking for one of our events | (a) Identity(b) Contact | Necessary for our legitimate interests (to promote our charitable aims and grow the organisation’s network) |
| To process payments (for event bookings, donations) | (a) Identity(b) Contact(c) Financial(d) Transaction(e) Communications Data | (a) Performance of a contract with you(b) Necessary for our legitimate interests (to recover sums due to us) |
| To manage our relationship with you which will include:(a) Notifying you about changes to our terms or privacy policy(b) Asking you to leave a review or take a survey | (a) Identity(b) Contact(c) Communications Data | (a) Information made publicly available (b) Necessary to comply with a legal obligation(c) Necessary for our legitimate interests (to keep our records updated and to study how participants and website visitors use our products/services) |
| To administer and protect our organisation and website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data) | (a) Identity(b) Contact(c) Technical | (a) Necessary for our legitimate interests (for running our charity, provision of administration and IT services, network security, to prevent fraud and in the context of a charity reorganisation exercise)(b) Necessary to comply with a legal obligation |
| To make suggestions and recommendations to you about events or activities that may be of interest to you | (a) Identity(b) Contact(c) Technical(d) Communications Data | Necessary for our legitimate interests (to develop our events and activities and grow our organisation) |
| To manage sponsorships  | (a) Identity(b) Contact(c) Financial(d) Transaction | (a) Performance of a contract (b) Necessary to comply with a legal obligation |
| To monitor enrolment and use of SWiT Cisco NetAcademy | (a) Identity(b) Contact(c) Technical(d) Communications Data | Necessary for our legitimate interests (to run and develop the SWiT NetAcademy) |

We will only ever collect the information we need. When we ask you to provide your personal data we will let you know why we are asking and how we will use your data, by directing you towards this privacy policy.

**Communications**

We provide emails listing SWiT events and awards, recent news and other information about SWiT to those persons who have signed up on our website to receive news and information about us, and also to individuals that we have an on-going relationship with or who have attended one of our events. We will only contact you with relevant information about new events or work which we believe will be of interest to you.

It is always your choice as to whether you receive communications. You can ask us not to contact you or send you any communications by contacting us at the email address below or replying to any email received, in which case we will maintain a record that you do not wish to be contacted.

**How long do we keep your personal data?**

We hold your data only as long as necessary for the purpose it was collected (in particular for the duration of our relationship with you, until you advise that you wish to remove your contact information) and 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.

If you request that we have no further contact with you, we will keep some basic information in order to avoid sending you unwanted communications in the future.

**What personal data do we share?**

We may disclose your information to third parties in order to achieve the other purposes set out in the table above as follows:

***SWiT Cisco Academy***

SWiT partners with Cisco to deliver the SWiT Cisco Academy. When you enroll on a SWiT Cisco Academy course Cisco holds and uses your information as detailed in the [Cisco NetAcad Privacy Data Sheet](https://www.netacad.com/data-protection) and in accordance with the [Cisco Privacy Statement](https://www.cisco.com/c/en/us/about/legal/privacy-full.html). SWiT Cisco Academy administrators have access to your SWiT Cisco Academy data as set out in the Cisco NetAcad Privacy Data Sheet.

***Awards Nominations and Judging***

We share information about Awards nominees and finalists with our judges to enable them to carry out their judging duties.

***Events***

We publish information about Awards Finalists and Events Speakers on our website, through our social media channels, and in press releases promoting the Awards or event you are speaking at.

If you buy a ticket for an event we will use Paypal, a third-party payment processor to take your payment. Paypal will be the data controller of your personal data for the purpose of processing the transaction, and may involve your information being processed outside of the European Economic Area (EEA). Please read their terms and conditions before completing your payment, which can be accessed here: [Paypal Privacy Policy](https://www.paypal.com/uk/webapps/mpp/ua/privacy-full#1).

We may also be obliged to share your personal data where a third party is hosting a SWiT networking event, and requires a list of attendees for security and to enable you to gain entry into their buildings. In this case, the attendee lists provided show first name, last name, and company affiliation, if any, only. If you plan to attend an event but would prefer that your name not be included on the attendee list, we will (where possible) remove it at your request.

 ***Surveys***

If you agree to give us feedback or complete a survey, we will use the information to improve our events and activities. We generally do not require any personal information when we ask you to complete a survey but, if you do provide your name, company name and email address, we will not use your details except in relation to the survey. We sometimes use Survey Monkey to process surveys. Survey Monkey operates in the U.S. For more information see [Survey Monkey Privacy Policy](https://www.surveymonkey.com/mp/legal/privacy-policy/?ut_source=footer).

***Social media interaction***

We use third-party social media providers to communicate and interact with the SWiT community. Currently these include Facebook, LinkedIn and Twitter. You may, if you choose to do so, follow SWiT or join our online community. When you interact with SWiT and our community through social media you agree to abide by the terms and conditions of Facebook, LinkedIn or Twitter, as applicable. We are not responsible for your use of or for any content, including personal data, that you share through social media.

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 policy of every website you visit.

***Service Providers***

We may have to share your personal data with the parties set out below in order to be able to carry out our activities:

* service providers who help to manage our IT and back office systems and assist with our Customer Relationship Management activities, in particular Akari Solutions Limited, Salesforce UK Limited, Wix.com Ltd, Google LLC
* our solicitors and accountants.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law.

**International Transfers**

Our external third parties may be based outside the UK or the EEA. Whenever we transfer your personal data out of the UK or the EEA, we ensure that the same level of protection is afforded to it by ensuring at least one of the following safeguards are put in place:

* We will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data by the European Commission For further details, see [European Commission: Adequacy of the protection of personal data in non-EU countries](https://ec.europa.eu/info/law/law-topic/data-protection/data-transfers-outside-eu/adequacy-protection-personal-data-non-eu-countries_en);
* Where we use certain service providers, we may use specific contracts approved by the European Commission which give personal data the same protection it has in Europe. For further details, see [European Commission: Model contracts for the transfer of personal data to third countries](https://ec.europa.eu/info/law/law-topic/data-protection/data-transfers-outside-eu/model-contracts-transfer-personal-data-third-countries_en); and

**Your rights and choices**

You have the following rights in relation to the personal data we hold about you:

**Your right of access:**

You have a right to request that we confirm to you whether we are processing your personal data and to receive a copy of the personal data we hold about you, along with certain other details.

**Your right to rectification**

If you believe that the personal data that we hold about you is inaccurate or incomplete, you are entitled to request that we correct it. Where you are entitled to rectification and we have shared your information with others, we will (if possible) inform them about the rectification, and where we are lawfully able to do so, we will also let you know who we have shared your data with to enable you to contact them directly.

**Your right to erasure**

You can ask us to delete or remove your personal data, in some circumstances, such as where you believe there is no good reason for us continuing to process it, or where you withdraw your consent to processing. Please note that we may not always be able to comply with your request of erasure for specific legal reasons. Where this is applicable, we will endeavour to notify you at the time of your request.

**Your right to object to processing**

You can ask us to stop processingyour personal data where we are relying on a legitimate interest to process your data, and we will do so, unless we can demonstrate that we have compelling legitimate grounds to process your information which override your individual rights. If applicable, where personal data are processed for direct marketing purposes, you have the right to object at any time to processing of personal data concerning you for such marketing, which includes profiling to the extent that it is related to such direct marketing.

**Your right to restrict processing**

In certain circumstances, you have a right to ask us to ‘block’ or suspend the processing of your personal data, such as where you want us to establish the data’s accuracy, or where our use of the data is unlawful but you do not want us to erase it.

**Your right to data portability**

You have a right to ask us to transfer 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.

 **Your right to withdraw consent**

Where we are relying on consent to process your personal data, you have a right to withdraw your consent at any time. 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.

**Your right to lodge a complaint with the supervisory authority**

If you have a concern about any aspect of our privacy practices, including the way we have handled your personal data or a complaint you have made, you can report it to the relevant supervisory authority, which in the UK is the Information Commissioner’s Office. We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance by emailing the address below.

If you wish to exercise any of the rights set out above please contact us by emailing: privacy@scotwomenintech.com

You will not have to pay a fee to access your personal data (or to exercise any of your 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.

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 as quickly as possible and within one month of the date on which we receive the request. 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.

**Keeping your personal data safe**

When you give us your personal information, we take steps to ensure that appropriate technical and organisational controls are in place to protect it. We regularly review our security measures to ensure that these are in line with recommended guidance and to help guard against risk of breaches.

**Changes to this policy**

This policy was last updated on 28 November 2019. We keep our privacy policy under regular review and may make occasional changes to this policy if any of our activities significantly change. We will post any significant changes on our website and notify you to the most recent email address that we have on file.