



VOLUNTEERING PRIVACY STATEMENT

This statement specifically relates to processing personal data of volunteers:

The Commonwealth War Graves Commission (CWGC) and the Commonwealth War Graves Foundation (CWGF) are Data Controllers.

They are separately responsible for determining the manner and purposes of processing the personal data of their volunteers.

The Commonwealth War Graves Commission

2 Marlow Road
Maidenhead
SL6 7DX

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PURPOSES OF COLLECTING VOLUNTEER DATA

The CWGC collects your name, address, postcode, telephone number, mobile number, email address, work preferences and county in which you would like to volunteer.

This information is collected for the following purposes:

- To contact you about the specific volunteer opportunity for which you have expressed an interest
- To contact you about future volunteer opportunities
- To follow your posts on social media so we can retweet news and pictures you share about key events regarding your volunteer work
- To update you about the progress of volunteer work in your area
- We may share information and images from the event internally with the Commonwealth War Graves Foundation and use images and content to promote the work of the project for Foundation members; and
- To manage your volunteering placement.

Information that has been collected about volunteers will be made available to other CWGC or CWGF staff internally where there is a business need, limited to those who require access to manage volunteer information.

The CWGC collect this information using both an electronic form and a postal form. Forms containing volunteer details will be held by the Volunteer Co-ordinator operating regionally and by the United Kingdom & Northern Area (UKNA) Human Resources department at the CWGC Head Office.

SPECIAL CATEGORY DATA

We may also collect some special category personal data about you, if you choose to share it with us:

- Gender
- Ethnicity
- Disability

PURPOSES OF COLLECTING SPECIAL CATEGORY DATA

To monitor participation in volunteer projects to ensure the CWGC and CWGF are offering inclusive volunteering opportunities to all communities and to increase efforts to widen the participation of those in underrepresented groups.

LAWFUL BASIS OF PROCESSING VOLUNTEER DATA

Volunteer data collected and managed by the CWGC or WGF is done so under Article 6(1)(f) of the GDPR as a legitimate interest.

The legitimate interest being pursued is the appropriate administration, management and retention of a network of volunteers to assist with initiatives which support or promote the work of the Commonwealth War Graves Commission or the Foundation.

Supporting this legitimate interest may involve sending direct marketing to supporters, contacting volunteers to plan and administrate activities, taking steps to ensure and monitor compliance with legal obligations and internal standards and procedures, assessing suitability of volunteers for potential roles and keeping records of volunteer activities and performance.

Special category personal data is processed under Article 9(a) of the GDPR based on your explicit consent. You may withdraw your consent to our processing of your special category data whenever you wish by contacting your volunteer co-ordinator or by writing to our Data Protection Officer.

The information provided by volunteers will not be used for direct marketing, unless the volunteer specifically opts in to receiving such communications.

Please notify the Data Protection Officer (dpo@cwgc.org) should you have any queries regarding the processing of your personal data for the purposes listed above.

SHARING INFORMATION

The CWGC or CWGF will not share your personal data with other organisations and will never sell your personal data to a third party.

Personal data about volunteers is collected through the volunteer recruitment process. Where you have been informed beforehand, the CWGF or CWGF may collect additional information about you related to your application, from third parties such as former employers, character references or background check agencies to ensure the suitability of your volunteer placement.

INFORMATION ABOUT CRIMINAL CONVICTIONS

The CWGC and CWGF are committed to safeguarding children and vulnerable adults and may require you to either provide or undertake a check of criminal convictions via the Disclosure and Barring Service (DBS) as part of our volunteer recruitment process. We will use this information to:

- a. determine your suitability for the role; and
- b. ensure you remain suitable for a role given to you.

For some volunteering roles, the CWGC or CWGF may have a legal obligation to perform a DBS check and for other roles may carry out a check as part of its due diligence. To the extent that we require consent, by submitting an application to volunteer, you confirm your consent for the CWGC and/or the CWGF to carry out such checks.

MANAGING YOUR INFORMATION

You should avoid publishing on social media or newspapers etc. any information that you would not want to be shared, or information which might impact on the privacy of other living individuals during your time of volunteering for either the CWGC or the CWGF.

RIGHTS

- Right to be informed – you have a right to be told how your personal data will be used. This policy statement and other communications you receive from the CWGC or CWGF aim to provide transparent information to you about how your personal data is used.
- Right of access – you can write to us and request a copy of your personal data.
- Right of erasure – you can write to us and ask us to delete your personal data. We will fulfil your request unless we hold it for a valid lawful reason.

- Right to correction – please let us know if your details require updating and we will get right on it.
- Right to restrict processing – If there is disagreement about the accuracy of personal data, we hold on you, or its legitimate use, you can ask us to restrict its usage.
- Right to object – Please let us know if you would like to object to the use of your personal data on the basis of the legitimate interests specified in this statement, or the use of your personal data for direct marketing, or for statistical purposes.

SECURITY

The information you share with us will always be held securely. Our systems ensure that any personal data you share with us electronically will be encrypted whilst in transit and while at rest on servers in the UK and the EU. Both CWGC and CWGF use a range of security features including Multifactor Authentication to keep accounts secure.

RETENTION

Your personal data will be held for as long as you are an active volunteer. If you choose to stop volunteering our systems will hold your personal data for a period of 3 months until it is automatically deleted.

This statement forms part of the CWGC Privacy Notice which can be found on the CWGC website. Please refer to the full Privacy Notice for additional information about the CWGCs handling of personal data including contact details for the regulator.

VERSION CONTROL

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