## **Soldiering On Awards Ltd Privacy Policy Statement**

This Website is owned by Soldiering On Awards – a Brand of X-Forces Enterprise Community Interest Company.

Registered Address: Soldiering On Awards, X-Forces Enterprise, Mountbarrow House, Elizabeth Street, London SW1W 9RB.

## **Privacy**

We take your privacy seriously and take reasonable efforts to protect it. We have created this Privacy Policy to share with you the ways in which we collect and use your information. We will never knowingly share your personal information without your knowledge and approval. Please read this Policy carefully before sharing any personally identifiable information as described below.

## The DPA & GDPR May 2018

We and this website comply with the DPA (Data Protection Act 1998) and the GDPR (General Data Protection Regulation), effective from 25th May 2018. We will update this policy accordingly after the UK leaves the European Union.

### Data we may gather

We may collect the following information:

- Name and job title.
- Contact information: Addresses; email addresses; telephone numbers; website addresses.
- Information relevant to:
  - the Awards nominations
  - o the Independent Judging Panel process
  - o nominations for the Awards' public voting categories.

Please note, we will contact all Individuals or groups nominated to obtain their agreement that we may share the information and associated photographs, videos and organisational logos provided by the nominator or themselves. This information will be shared with our employees, officers, representatives, the Judges, Award Sponsors and/or sub-contractors, in connection with the administration of the

Soldiering On Awards and its aims and objectives. This information will be retained for an appropriate period based on the progress and success of the nomination in question.

#### How we use this data

As part of the Soldiering On Awards nominations process, we obtain data from nominations submitted. We will always ask the nominee's permission to use this data where they have been nominated by a third party.

Collecting this data enables nominations to be assessed by the Soldiering On Awards Independent Judging Panel and may be used in connection with the Public Voting Awards categories.

Basic contact information allows us to contact you in response to a specific enquiry and to send you information about Soldiering On Awards events and news and other things we think might be relevant to you, or of interest to you.

As relevant, it enables us to register your interest and take forward applications for attendance at the Soldiering On Awards and related events.

By registering your details, you agree to the collection, use and transfer of your information under the terms of this policy, which is subject to change at any time. Any changes will be posted on this page.

Further information is given below about Mailchimp, the programme we use to send newsletters.

#### **Legitimate Interest**

We may process your data under the lawful basis of 'legitimate interest' if we identify a legitimate interest and:

- + you could benefit from our business communications (commercial interests);
- + emailing or phoning you is the most appropriate means of communication;
- we've balanced your interests, rights and freedoms;
- + you could reasonably expect to receive the information; and
- + it would not cause you unjustified harm.

You can see our Legitimate Interest Impact Assessment here

Even though we process data under legitimate interest, we believe in giving people the right to choose. Therefore, leading up to 25th May 2018, all subscribers to our mailing list will be given clear instructions on how to reconsent or unsubscribe from the list. Unsubscribers will be removed immediately, and people who do not indicate

a preference may continue to receive periodic emails unless they ask us to remove their details.

## Your rights under GDPR

In line with the GDPR, this section confirms your rights.

The personal data we hold may include your name, address, email address, organisation or company and more details about you if you are a nominator or nominee. We will never sell this information. We will never pass the information on to anyone else other than those participating in the Soldiering On Awards nominations process and those supporting us in running the Awards event and related activities.

If you would prefer for your information to be deleted, this will happen immediately. You may write to us at <a href="mailto:info@soldieringon.org">info@soldieringon.org</a> at any time to ask us to remove the data we hold about you.

If you request any information about the data we hold, we will supply this free-of charge within 14 days.

The lawful basis on which we process data is to keep you informed about our activities in which you have shown an interest.

We will keep your information until you ask us not to.

You have the right to complain to the Information Commissioner's Office if you believe we have mishandled your data.

You may have given us your consent to contact you by opting in via the sign-up box or by giving us your business card or details and agreeing to be added to our mailing list. If this is the case, you have the right to unsubscribe at any time.

### **Data security**

We employ security measures to protect, so far as reasonably possible, your information from access by unauthorised persons and against unlawful processing, accidental loss, destruction and damage.

#### **Data Breaches**

We will report any unlawful data breach of this website's database or the database(s) of any of our third-party data processors to all relevant persons and authorities within 72 hours of the breach if it is apparent that personal data stored in an identifiable manner has been stolen.

#### **Data Protection Officer**

If required, please contact the Data protection Officer at our Registered Address: Soldiering On Awards, X-Forces Enterprise, Mountbarrow House, Elizabeth Street, London SW1W 9RB. To email, contact the Data protection Officer at <a href="mailto:info@soldieringon.org">info@soldieringon.org</a>

#### **External Website Links & Third Parties**

Although we aim to include only quality, safe and relevant external links, we advise you to adopt a policy of caution before clicking any external web links mentioned throughout this website. (External links are clickable text /banner / image links to other websites.)

We cannot guarantee or verify the contents of any externally linked website despite our best efforts. You should therefore note that you click on external links at your own risk and we cannot be held liable for any damages or implications caused by visiting any external links mentioned.

## Social Media Policy and Usage

While we may have official profiles on social media platforms, you are advised to verify the authenticity of those profiles before engaging with or sharing information with them. We will never ask for user passwords or personal details on social media platforms. Everyone is advised to conduct themselves appropriately when engaging with us on social media.

## **Soldiering On Awards Newsletter**

We regularly send out a newsletter via email (through Mailchimp) to people who have supplied their name and email address for that reason. In these newsletters, we may inform you about upcoming Soldiering On Awards-related activities and events.

See: https://mailchimp.com/legal/privacy/

We respect your right to 'opt-out' of these mailings. You may choose to unsubscribe from the newsletter at any time by clicking the unsubscribe link at the end of the email or by contacting us at info@soldieringon.org

### Where can I access this policy?

This Policy is accessible from every page of the web site, under the link "Privacy" in the footer.

#### Contact

All comments, queries and requests relating to our use of your information are welcomed and should be addressed to info@soldieringon.org.

# **Changes to this Privacy Policy**

We reserve the right to amend this policy at any time, if this becomes necessary after initial release, or if it becomes necessary with respect to additional, deleted, modified or amended services provided by us.

We will not personally notify you of any amendments to this policy. You are urged to check this policy frequently to see whether any changes have been made. You understand and agree that continued use of this website assumes that you have read and accepted this policy, as it may be amended from time to time.

# Effective date of this privacy policy

This Privacy Policy was last updated, and became effective, on 26th<sup>t</sup> November 2018.