

**Commonwealth War Graves Commission
Privacy Policy**

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1. Introduction

The Commonwealth War Graves Commission (“CWGC”) takes your personal information and your privacy seriously. This Privacy Policy sets out how we use and protect any information about you which is obtained via our website or you send to us by post or e-mail. As we may change this policy from time to time you should check our website to view the most recent version of this policy.

Should you have any queries about the content of this policy, please contact the CWGCs Data Protection Officer:

Data Protection Officer
Commonwealth War Graves Commission
2 Marlow Road
Maidenhead
Berkshire
SL6 7DX

E-mail: DPO@cwgc.org

2. Policy Summary

We respect your privacy and we take care with the information we obtain. We will only ask for personal data when it is necessary to provide you with the service you have requested, such as answering an enquiry or your subscription to our newsletter. We may also make your personal information anonymous to undertake statistical analysis for internal use. If we want to use your data for any purpose outside of the terms of this policy, we will ask you first.

3. What is covered by this policy?

This policy covers all web pages on our website and any correspondence (electronic or otherwise) between you and us.

4. Identity of the Data Controller

This policy does not cover external sites which may have links on our website. We are not responsible for the content of these sites and any personal data collected by these organisations is not our responsibility.

Identity of the Data Controller

The Commonwealth War Graves Commission is the Data Controller, which means that it is the body which determines the manner and purpose of processing your personal data.

The UK information Commissioners Office is the supervisory authority for all matters concerning the processing of your personal data within the UK where CWGCs head office is located.

If you are based in another EU country you may contact the relevant authority for your jurisdiction:

FRANCE:

Commission Nationale de l'Informatique et des Libertés
3 Place de Fontenoy
TSA 80715
75334 PARIS CEDEX 07
France

BELGIUM:

Commissie voor de bescherming van de persoonlijke levenssfeer
Drukpersstraat 35, 1000 Brussel

5. How do we collect personal information?

We respect your privacy and take great care with the information we obtain. We may collect information from you via our website, by e-mails and post sent to our offices. For example:

- correspondence with us when making an enquiry
- buying something through our website
- subscribing to our newsletter

- registering as a user of our website
- when you voluntarily upload content, share stories or images with us for specified purposes.

6. The personal information we may collect

We may ask you to provide the following information:

- your name
- e-mail address
- postal address
- telephone number (mobile and/or landline)

Any personal information you provide will be transferred and stored on secure servers in a safe, confidential and secure environment. We will use all reasonable efforts to safeguard your personal information. However, you should be aware that the use of the internet is not entirely secure and for this reason we cannot guarantee the security or integrity of any personal information which is transferred from you or to you via the internet.

7. Information Rights

The CWGC wants you to be aware that you have rights regarding the processing of your personal data. If you would like further information about this you can contact the Commission's Data Protection Officer at DPO@cwgc.org

The Right to be Informed – The right to be informed places an obligation upon organisations such as CWGC to provide clear and transparent details of its processing.

The Right of Access – You may request a copy of the personal data held by organisations such as the Commission free of charge. The requested information must be provided within 30 days of the request and information required for verification of ID documents unless an exemption applies.

The Right to Rectification – The Commission will make all efforts to rectify inaccurate personal data. If the accuracy of personal data is disputed then we will keep a record of the dispute. If the personal data we hold on you is incomplete you may request that it is completed.

The Right to be forgotten – The regulation allows you to request the deletion or erasure of personal data held by the Commission where there is no legitimate reason for its continued processing.

The Right to Restrict Processing – You may request that the Commission restricts the processing of personal data. This would mean that the Commission continues to hold the data but it will not process it further. This may be an alternative option to erasure.

The Right to Data Portability – Data portability means having data in formats which allow you to move personal data easily from one IT environment to another in a secure way. You may request that the personal data held about you by the Commission is shared with other organisations or departments. This right means that you are able to request the transfer of data without hindrance to its usability.

The Right to Object – You have the right to object to:

8. Processing based on legitimate interests or the performance of a task
9. Direct marketing
10. Processing for purposes of scientific/historical research and statistics.
11. Automated decision taking and profiling

12. Debit and Credit Card Information

All debit and credit card payments made online are processed through Paypal and we do not store or have access to any card information that you provide through this method of payment.

Further details on the Paypal privacy policy can be found at:

https://www.paypal.com/uk/webapps/mpp/ua/privacy-full?locale.x=en_GB&viewType=popup

We will never request credit/debit card information from you via e-mail. Please do not send this information or other sensitive information to us via email.

13. How we use the information you submit

The personal data we collect from you will be used to perform the service you have requested, for example answering your enquiry, fulfilling your order, registering you to our newsletter or website. In addition, it may be used for the following:

- For customer research: we may contact you to ask you about the service you have received, why you requested it and how it can be improved;
- General administration of the services we provide.

We may also use the information you provide to carry out internal research in order to:

- Gain a greater understanding of the requirements of visitors to our website and cemeteries and memorials;
- Develop more relevant and appropriate content on our website and publications;
- Provide better services.

14. Cookies

Cookies are small files of letters and numbers that are downloaded onto a user's device and allow the website to recognize the user's device.

Most browsers are automatically set to accept cookies but users can usually change their settings to prevent cookies being stored on their device.

The keyboard / screensaver combo uses a single cookie called **kiosk** which can have a value of either **on** or **off**. No user data is stored.

If you would like to read about The CWGC's use cookies please refer to the cookies statement on our website.

15. Sharing your information

We do not share your information, including your personal details, with anyone outside of the CWGC unless we have sought your express permission. However, in certain circumstances, it may be necessary to pass your personal details to one of our member Governments. Should this be the case, you will be notified and informed of the legal basis for processing. In the majority of circumstances this will be based on your explicit consent.

As a Commonwealth organisation and by the nature of our work, we operate in a number of countries around the world. In order to deal with your enquiry or other correspondence it may be necessary for us to transfer and process your personal details to countries outside the United Kingdom which do not have in place similar protection as provided by the General Data Protection Regulation. However, we have taken steps to ensure the adequacy of the territory and the security of your information. If you would like to obtain further information about the steps we have taken to ensure the protection of your information please refer to the CWGC data protection and Information security standard.

12. Consent

Where the processing of your data is based on your consent, you will have been fully informed of our activity in unambiguous terms and actively opted into the processing based on this understanding. If you wish to withdraw your consent you have the right to do so by contacting the Data Protection Officer at dpo@cwgc.org.

Please be advised that if you withdraw your consent to processing your personal information there may be another lawful basis that we rely on to continue processing. We will advise you if this is the case. If you withdraw your consent and another lawful basis does not exist for us to process your personal data, services which you had previously opted into will stop accordingly.

13. Security

We take our commitment to Information Security very seriously. We have put in place appropriate physical, electronic and managerial procedures and safeguards to prevent unauthorised access or disclosure of any personal and other information. For example, we hold data in secure data centres, regular internal audits are carried out to ensure procedures are complied with and senior management monitor controls and outcomes. Any information you give to us either through our website, by e-mail or by any other means is stored securely and managed in accordance with the General Data Protection Regulation

16. Breach Management

We take every care to prevent breaches of security leading to the destruction, loss, alteration, unauthorised disclosure of, or access to your personal data.

In the unlikely and unfortunate event that this does happen, we will take all reasonable steps to mitigate any damage and notify you of the actions we have taken promptly. If you have concerns

regarding the handling of your personal data and would like to raise these with the Data Protection Officer, please send your concern to:

Data Protection Officer
The Commonwealth War Graves Commission
2 Marlow Road
Berkshire
SL6 7DX

Or email: DPO@cwgc.org

Your concerns will be handled and investigated confidentially .

17. Version Control

Document Name	Privacy Policy
Version	1.0

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Data Protection Officer	25 May 2018	25 May 2019