



## **DATA PROTECTION & PRIVACY POLICY**

<b>Last Updated:</b>	04 April 2025
<b>Next Review:</b>	04 April 2027
<b>Responsibility:</b>	Company Secretary

## 1. Contact Details

1.1. You can contact the Cold War Network CIC via email: [info@coldwarnetwork.co.uk](mailto:info@coldwarnetwork.co.uk)

## 2. Introduction

2.1. The Cold War Network CIC is a Community Interest Company registered with Companies House. The primary purpose of The Cold War Network is to foster collaboration, research, and discussion related to the Cold War era.

2.2. As a CIC, the Cold War Network is a type of social enterprise designed to use its profits and assets for the public good. Therefore, it is structured to ensure that its activities benefit the community and support its purpose.

2.3. The CIC is governed by a Board of Directors composed of representatives from member organisations. The Board oversees the planning and execution of network activities, including events, funding initiatives, and communication efforts. The Board of Directors is supported by an Advisory Board.

2.4. This Data Protection and Privacy Policy explains how the Cold War Network CIC use any personal information we collect about you when you use our website, engage with the Network or attend one of our events.

## 3. Who to ask about how your data is used

3.1. The Cold War Network CIC is the organisation's Data Controller and the Network's Data Protection Advisors are the Chair of the Board of Directors and the Company Secretary.

3.2. Where these roles are held by the same individual, the Network's second Data Protection Advisor will be the Vice Chair of the Board of Directors.

3.3. If you have any queries about the content of this policy, or how your data is managed, you can direct them to [info@coldwarnetwork.co.uk](mailto:info@coldwarnetwork.co.uk).

3.4. If you have consented to receive marketing and later change your mind, you may opt out at a later date by emailing [info@coldwarnetwork.co.uk](mailto:info@coldwarnetwork.co.uk).

## 4. What information we collect, use, and why:

4.1. We may collect or use the following information to provide services and goods, including delivery and third party referrals: Names and contact details; Addresses; Photographs or video recordings; Records of meetings and decisions; Payment details (including card or bank information for transfers and direct debits); Website user information (including user journeys and cookie tracking); Information relating to compliments or complaints.

4.2. We may collect or use the following information to receive donations or funding and organise fundraising activities: Names and contact details; Addresses; Payment or banking details; Donation history.

4.3. We may collect or use the following personal information for service updates or marketing purposes: Names and contact details; Addresses; Marketing preferences; Records of consent, where appropriate.

4.4. We may collect or use the following personal information for research or archiving purposes: Names and contact details; Addresses; Recorded images, such as photos or videos; Records of consent, where appropriate.

4.5. We may collect or use the following personal information to comply with legal requirements: Name; Contact information; Financial transaction information.

4.6. We may collect or use the following personal information for recruitment purposes: Contact details (e.g. name, address, telephone number or personal email address); Date of birth; Employment history (e.g. application, references or secondary employment); Education history (e.g. qualifications).

- 4.7. We may collect or use the following personal information for dealing with queries, complaints or claims: Names and contact details; Address; Financial transaction information; Information relating to health and safety (including incident investigation details and reports and accident book records); Correspondence.

**5. Lawful bases and data protection rights:**

- 5.1. Under UK data protection law, CWN must have a “lawful basis” for collecting and using your personal information. There is a list of possible lawful bases in the UK GDPR. You can find out more on the ICO’s website.
- 5.2. Which lawful basis we rely on may affect your data protection rights which are in brief set out below. You can find out more about your data protection rights and the exemptions which may apply on the ICO’s website.
- 5.3. Your right of access - You have the right to ask us for copies of your personal information. You can request other information such as details about where we get personal information from and who we share personal information with. There are some exemptions which means you may not receive all the information you ask for. [You can read more about this here.](#)
- 5.4. Your right to rectification - You have the right to ask us to correct or delete personal information you think is inaccurate or incomplete.
- 5.5. Your right to erasure - You can ask us to delete your personal information.
- 5.6. Your right to restriction of processing - You have the right to ask us to limit how we can use your personal information.
- 5.7. Your right to object to processing - You have the right to object to the processing of your personal data.
- 5.8. Your right to data portability - You have the right to ask that we transfer the personal information you gave us to another organisation, or to you.
- 5.9. Your right to withdraw consent – When we use consent as our lawful basis you have the right to withdraw your consent at any time.
- 5.10. If you make a request, we must respond to you without undue delay and, in any event, within one month.
- 5.11. To make a data protection rights request, please contact us using the contact details at the top of this privacy notice.

**6. Our lawful bases for the collection and use of your data:**

- 6.1. Our lawful bases for collecting or using personal information to provide services and goods, including delivery and third party referrals are:
- 6.2. Consent - we have permission from you after we gave you all the relevant information. All of your data protection rights may apply, except the right to object. To be clear, you do have the right to withdraw your consent at any time.
- 6.3. Our lawful bases for collecting or using personal information to receive donations or funding and organise fundraising activities are:
- 6.4. Consent - we have permission from you after we gave you all the relevant information. All of your data protection rights may apply, except the right to object. To be clear, you do have the right to withdraw your consent at any time.
- 6.5. Our lawful bases for collecting or using personal information for service updates or marketing purposes are:
- 6.6. Consent - we have permission from you after we gave you all the relevant information. All of your data protection rights may apply, except the right to object. To be clear, you do have the right to withdraw your consent at any time.
- 6.7. Our lawful bases for collecting or using personal information for research or archiving purposes are:

- 6.8. Consent - we have permission from you after we gave you all the relevant information. All of your data protection rights may apply, except the right to object. To be clear, you do have the right to withdraw your consent at any time.
- 6.9. Our lawful bases for collecting or using personal information to comply with legal requirements are:
  - 6.10. Legal obligation – we have to collect or use your information so we can comply with the law. All of your data protection rights may apply, except the right to erasure, the right to object and the right to data portability.
  - 6.11. Our lawful bases for collecting or using personal information for recruitment purposes are:
    - 6.12. Consent - we have permission from you after we gave you all the relevant information. All of your data protection rights may apply, except the right to object. To be clear, you do have the right to withdraw your consent at any time.
    - 6.13. Our lawful bases for collecting or using personal information for dealing with queries, complaints or claims are:
      - 6.14. Consent - we have permission from you after we gave you all the relevant information. All of your data protection rights may apply, except the right to object. To be clear, you do have the right to withdraw your consent at any time.

## **7. Where we get personal information from?**

- 7.1. Directly from you.

## **8. How long do we keep information?**

- 8.1. We will retain your data:
  - 8.2. until you inform us that you no longer wish the Network to communicate with you;
  - 8.3. while you are a member of the Network
  - 8.4. as required under UK law; for seven years in the case of financial transactions and for a minimum of 6 years after employment ceases in the case of employee basic personal data (name, address, e-mail and phone details);
  - 8.5. as stated in the terms of specific agreement entered into, e.g. permissions for child photography are held for 5 years;
  - 8.6. if you leave a comment on the website, the comment and its metadata are retained by the servers of our website hosts and service provider – FastHost and Wordpress. All users can see, edit, or delete their personal information at any time. Website administrators can also see and edit that information.
  - 8.7. Credit card and mail order data is shredded within 6 months of payment being cleared unless the transaction requires further investigation. Information will be destroyed or deleted in a manner appropriate to its sensitivity.

## **9. Who we share information with:**

- 9.1. Others may share information with charities and voluntary organisations; organisations we need to share information with for safeguarding reasons; organisations we're legally obliged to share personal information with.
- 9.2. We will apply for your explicit and informed consent in the event that we require to share your data in any other way that is not covered in this policy.

## **10. How to complain:**

- 10.1. If you have any concerns about our use of your personal data, you can make a complaint to us using the contact details at the top of this privacy notice.
- 10.2. If you remain unhappy with how we've used your data after raising a complaint with us, you can also complain to the ICO.

The Cold War Network CIC  
Company number 16113608

- 10.3.** The ICO's address: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF.
- 10.4.** Helpline number: 0303 123 1113.
- 10.5.** Website: <https://www.ico.org.uk/make-a-complaint>