



PRIVACY NOTICE

The Institute of Masters of Wine

The Institute of Masters of Wine (UK registered company number 1059707) (**IMW**), is committed to protecting your privacy. We aim to respect any personal information you share with us, or that we receive from other organisations, and keep it safe. This Privacy Notice (**Notice**) explains how we collect and use your personal information and your rights and choices in relation to it.

If you have any questions about this Notice or the ways in which we use your personal information please contact us using the details in the section “**Contact us**” below.

This Notice contains important information about your personal rights to privacy, so please read it carefully.

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1. **We collect personal information about you:**

(a) When you give it to us **directly**

For example, personal information that you submit through our website by making a payment, setting up an account, signing up for our courses and/ or for training or membership, or for our events, or personal information that you give to us when you otherwise communicate with us by email, phone or letter.

(b) When we obtain it **indirectly**

For example, your personal information may be shared with us by third parties including, for example, our business partners; sub-contractors in technical, payment and delivery services; advertising networks; analytics providers and search information providers. To the extent we have not done so already, we will notify you when we receive personal information about you from them and tell you how and why we intend to use that personal information.

(c) When it is available **publicly**

Your personal information may be available to us from external publicly available sources. For example, depending on your privacy settings for social media services, we may access information from those accounts or services (for example when you choose to interact with us through platforms such as Facebook, Instagram or Twitter).

(d) When you visit our **website**

When you visit our website www.mastersofwine.org, we automatically collect technical information, such as your IP address and information about your device, as well as information about your visit to the website and browsing patterns.

In general, we may combine your personal information from these different sources for the purposes set out in this Notice.

2. What personal information do we collect and use?

We may collect, store and otherwise use the following kinds of personal information:

- A. **Identity data** such as your name, data of birth and social media identity.
- B. **Contact details** such as your address, email address and telephone number.
- C. **Financial data** such as bank account and payment card details.
- D. **Technical data** such as IP address and details of your device and interactions with our websites.
- E. **Personal descriptions and photographs;**
- F. Details of your **qualifications/ experience** and other **biographical information;**
- G. information about your **relationship with IMW/** services and events which we consider may be of interest to you; and/ or
- H. any other personal information which you choose to share with us as per Section 1 above.

Do we process special categories of data?

Data privacy law recognises certain categories of personal information as sensitive and therefore requiring more protection, for example information about your health, ethnicity and political opinions.

In certain limited situations, we may collect and/or use these special categories of data. We will only process these special categories of data if there is a valid reason for doing so and where the law allows us to do so.

3. **How and why will we use your personal information?**

Your personal information, however provided to us, will be used for the purposes specified in this Notice. In particular, we may use your personal information:

- a. to provide you with services, products or information you have requested;
- b. to provide further information about our work, services, activities or products (with consent where necessary);
- c. to process your payments and administer membership and our course and events;
- d. to answer your questions/ requests and communicate with you in general;
- e. for our research purposes and to further the work of the IMW in general;
- f. to run/ administer our website, keep them safe and secure and ensure that content is presented in the most effective manner for you and for your device;
- g. to register, administer and personalise online accounts;
- h. to process your application for a job with us;
- i. to administer your employment/ volunteer/ other working relationship with us (for example, to pay your salary or honorarium);
- j. for training and/ or quality control;
- k. to audit and/ or administer our accounts;
- l. to satisfy legal obligations which are binding on us, for example in relation to regulatory, government and/ or law enforcement bodies with whom we may work (for example requirements relating to the payment of tax or anti-money laundering);
- m. for the prevention of fraud or misuse of services; and/or
- n. for the establishment, defence and/ or enforcement of legal claims.

4. **Lawful bases**

Data privacy law requires us to rely on one or more lawful basis to process your personal information. The following are relevant to us:

- Where you give consent (for example, to receive email updates).
- We have entered into a contract with you or taken steps at your request prior to entering into one (for example your membership).
- Where necessary to comply with a legal obligation to which we are subject.
- Where there is a legitimate interest in us doing so, provided our use is fair, balanced and does not unduly impact on your rights and freedoms.

Our legitimate interests

Depending on the activity, we may be relying on our legitimate interests or those of our partner organisations. Those legitimate interests include the following:

- Our legitimate interests as a professional body for Masters of Wine, including to promote excellence, interaction and learning across all sectors of the global wine community;
- Administration and operational management, including responding to solicited enquires, providing information, events management, administering our courses and examinations and employment and recruitment requirements; and
- Marketing and research, including administering campaigns and sending material by post.

“Legitimate interests” can also include your interests, such as when you have requested information or services from us, and those of third parties.

5. **How long do we keep your personal information?**

In general, we will retain your information for as long as it is required in connection with the purposes for which it was collected and/ or used (for example, account and membership information for at least as long as you maintain an account and/ or membership). However, if before that date (i) your personal information is no longer required in connection with such purpose(s), (ii) we are no longer lawfully entitled to process it or (iii) you validly exercise your right of deletion, we will remove it from our records at the relevant time.

That length of time may vary depending on the reasons for which we are processing the personal information and whether we have a legal (for example under financial regulations) or contractual obligation to keep it for a certain amount of time.

In some cases we will keep personal information at least as long as necessary to comply with relevant regulatory or statutory requirements. We will also retain information, when and as long as necessary, to resolve legal disputes.

6. **Will we share your personal information?**

We do not sell or rent your personal information to third parties for marketing purposes. However, in general we may disclose your personal information to selected third parties in order to achieve the purposes set out in this Notice. Those parties may include, non exhaustively:

- (a) suppliers and sub-contractors for the performance of any contract we enter into with them, for example event organisers or IT service providers such as website hosts or cloud storage providers;
- (b) parties administering our pension contributions; and
- (c) financial companies such as Paypal that collect or process payments on our behalf;

In particular, we reserve the right to disclose your personal information to third parties:

- if we are under any legal or regulatory duty to do so; and/or
- to protect the rights, property or safety of IMW, its personnel, members, students or others.

If you are a Member and have an account, you have control of your website profile – please note that anything you make public will be visible over the public internet.

7. Security/ storage of and access to your personal information

We are committed to keeping your personal information safe and secure and take appropriate and proportionate security policies and organisational and technical measures to help protect your information from loss, destruction and misuse.

For example, your personal information is only accessible by appropriately trained staff, volunteers and contractors, and stored on secure servers with features enacted to prevent unauthorised access.

8. International Data Transfers

In general the personal information we collect about you is stored within the UK. However, we operate internationally, and we may use suppliers and partners to process personal information on our behalf that are based outside, and it is possible that personal information we collect from you will be transferred to and stored in a location outside the European Economic Area (“**EEA**”), for example in order to facilitate education seminars in Australia or the US.

Some countries outside of the EEA have a lower standard of protection for personal information, including lower security requirements and fewer rights for individuals. In these cases, we ensure adequate safeguards have been put in place to protect your personal information, such as European Commission-approved contracts. If you have any questions about the transfer of your personal information, please contact us using the details below.

Unfortunately, no transmission of your personal information over the internet can be guaranteed to be 100% secure.

9. Your privacy rights

Where we rely on your consent to use your personal information, you can **withdraw your consent** at any time. This includes the right to ask us to stop using your personal information for marketing purposes or to unsubscribe from our email list at any time. You also have the right to:

- a. **Request access** – you can ask for confirmation of the personal information we hold about you and request a copy of it. Provided we have successfully confirmed your identity (we need to be sure we are only releasing your personal information to you), we will provide you with your personal information subject to any exceptions that apply.
- b. **Object to the use** – you have the right to object to our use of your personal information where we are (i) relying on legitimate interests as our legal basis, (ii) using it for direct marketing or (iii) using it for statistical purposes.
- c. **Request erasure** – in some cases you can ask us to delete your personal information from our records (or anonymise it). We may retain some limited personal information so we can ensure you are not contacted by us in the future.

- d. **Request correction** – if you believe our records concerning you are inaccurate, you can ask us to update them. If you are unsure you can ask us to check the information we hold about you.
- e. **Require us to restrict processing** – you can ask for processing of your personal information to be restricted (i.e. held but not further used) if there is disagreement about its accuracy or legitimate usage.
- f. **Request the transfer** – in limited circumstances, you can ask us to transfer your personal information to you or another party.

Some additional rights apply in respect of what is known as ‘automated decision making’ but IMW does not currently use your personal information in this way.

Please note that these are legal rights which only apply in limited circumstances. For more information, or to exercise these rights, please contact us using the details below.

We may ask you for additional information, to confirm your identity, and for security purposes, before disclosing personal information requested to you.

10. **Changes to this Notice**

We may update this Notice from time to time to comply with changes in the law or reflect changes in our policies.

This Notice was last updated on 19 July 2018.

11. **Links and third parties**

Our website contains links to other sites. This Notice **does not** cover external websites and **we are not responsible** for the privacy practices or content of those sites. We encourage you to read the privacy policies of any external websites you visit via links on our website.

12. **Contact us (including complaints)**

Please let us know if you have any questions or concerns about this Notice or about the way in which we use your personal information by contacting us:

By email at: info@mastersofwine.org

By telephone on: +44 20 7383 9130

By post at: 6 Riverlight Quay London SW11 8EA United Kingdom

You are entitled to make a complaint at any time to the Information Commissioner’s Office, the UK data privacy regulator (<https://ico.org.uk/global/contact-us/>). We always appreciate the opportunity to resolve your concerns before you feel it is necessary to approach the ICO.