

Address:
Independent Workers Union
of Great Britain,
First Floor Office,
12-20 Baron Street,
London, N1 9LL

Email:
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Independent Workers Union of Great Britain



IWGB Privacy Notice

1. This privacy notice is supplied in compliance with the IWGB's data protection obligations under the General Data Protection Regulations (GDPR).
2. The Independent Workers' Union of Great Britain (IWGB) is the data controller. The IWGB's contact information is:
 - a. Address: 12-20 Baron Street, London, N1 9LL
 - b. Phone: 02034907530
 - c. Email: office@iwgb.org.uk
 - d. Website: iwgb.org.uk
3. The IWGB's Data Protection Officer is Sebastien Flais. Sebastien Flais's contact information is:
 - a. Address: 12-20 Baron Street, London, N1 9LL
 - b. Phone: 02034907530
 - c. Email: sebastienflais@iwgb.co.uk
4. As a membership organisation, which provides legal advice and representation, the IWGB gathers a fair amount of data. In addition to personal data pertaining to our members, we also gather data on our employees and volunteers, as well as on donors, supporters, and business contacts. Below we set out more information on the information gathered and reasons for gathering.
5. Membership Data
 - a. The IWGB maintains membership records for all members. The records include such things as the member's name, contact details, bank information, demographics, and employment-related information. This information is provided by the members.
 - b. An individual's membership records are maintained by us during their membership and for six years post-membership.
 - c. The lawful basis for collecting this data is known as "Legitimate Interests"¹. The legitimate interest we pursue is:

Running a grassroots and campaigning trade union whose primary purpose is to facilitate and promote collective and collaborative action of its members to improve their wages, terms, conditions, and working conditions.

¹ GDPR Article 6(1)(f)

- d. As we collect information on demographics like race and gender, and as by definition our membership records reveal the individual's trade union affiliation, our membership records are considered "Special Category Data". This means we need a further justification for processing this data. For this we rely on the "Legitimate Activities"² justification:

Processing is carried out in the course of its legitimate activities with appropriate safeguards by a foundation, association or any other not-for-profit body with a political, philosophical, religious or trade union aim and on condition that the processing relates solely to the members or to former members of the body or to persons who have regular contact with it in connection with its purposes and that the personal data are not disclosed outside that body without the consent of the data subjects.

- e. The IWGB has conducted a Data Protection Impact Assessment (DPIA) and concluded that the above legal bases for processing membership data are appropriate. A copy of the DPIA can be provided to members upon request.
- f. As part of the IWGB's aim is to facilitate collective action and collaboration, the IWGB will facilitate members contacting each other by the calling of meetings or use of Whatsapp groups or similar technology. No more information will be shared than the minimum necessary to facilitate group communication and collaboration and members have a right to opt out of these communications if they so wish by merely informing the IWGB of their desire to opt out.
- g. The IWGB engages data processors to assist with the processing of membership data. Types of processors include email servers such as gmail, electronic document storage such as Dropbox, and other processors which facilitate communication with members, such as Mailchimp and Text Tank. The IWGB reserves the right to engage other processors as and when is necessary to assist with the processing of membership data in furtherance of the legitimate aims identified above.
6. Casework Data
- a. The IWGB maintains additional records for members who are seeking legal advice and/or representation with our Legal Department. The records include such things as extensive details related to their occupation or licencing and in many cases will include medical records. This information is provided mainly by the members though some may be provided by third parties involved in the member's case.

² GDPR Article 9(2)(d)

- b. An individual's casework records are maintained by us during their case and for six years post-case.
- c. The lawful basis for collecting this data is known as "Legitimate Interests"³. The legitimate interest we pursue is:

Providing quality legal advice and representation to IWGB members.

- d. As we collect information on demographics like race and gender, and often medical data, casework data are considered "Special Category Data". This means we need a further justification for processing this data. For this we rely on the "Legitimate Activities"⁴ justification:

Processing is carried out in the course of its legitimate activities with appropriate safeguards by a foundation, association or any other not-for-profit body with a political, philosophical, religious or trade union aim and on condition that the processing relates solely to the members or to former members of the body or to persons who have regular contact with it in connection with its purposes and that the personal data are not disclosed outside that body without the consent of the data subjects.

- e. The IWGB has conducted a Data Protection Impact Assessment (DPIA) and concluded that the above legal bases for processing casework data are appropriate. A copy of the DPIA can be provided to members upon request.
- f. The IWGB engages data processors to assist with the processing of casework data. Types of processors include email servers such as gmail and electronic document storage such as Dropbox. The IWGB reserves the right to engage other processors as and when is necessary to assist with the processing of casework data in furtherance of the legitimate aims identified above.

7. Employee Data

³ GDPR Article 6(1)(f)

⁴ GDPR Article 9(2)(d)

- a. The IWGB collects personal data on its employees so as to carry out its function as an employer. The records include such things as contact details, CV's, bank details, and employment records. This information is provided by the employees.
- b. This data is maintained by us for two years post-employment or as long as is necessary for the defense of potential legal claims.
- c. The lawful basis for collecting this data is known as "Legitimate Interests"⁵. The legitimate interest we pursue is:

Being a fair employer which provides staff with all relevant statutory rights as well as terms and conditions above and beyond those required by statute.

- d. The IWGB has conducted a Legitimate Interest Assessment (LIA) for this category of data processing and has concluded that legitimate interests is an appropriate lawful basis for the processing. The LIA can be provided to employees upon request.
- e. The IWGB engages data processors to assist with the processing of employee data. Types of processors include email servers such as gmail, electronic document storage such as Dropbox, and other processors which facilitate the IWGB's role as an employer, such as pension provider NOWPension and payslip provider KashFlow. The IWGB reserves the right to engage other processors as and when is necessary to assist with the processing of employee data in furtherance of the legitimate aims identified above.

8. Volunteer Data

- a. The IWGB collects personal data on its volunteers so as to carry out its function as a voluntary/non-profit organisation which uses volunteers. The records include such things as contact details and CV's. This information is provided by the volunteers.
- b. This data is maintained by us for six years after volunteering or as long as is necessary for the defense of potential legal claims.
- c. The lawful basis for collecting this data is known as "Legitimate Interests"⁶. The legitimate interest we pursue is:

Being a voluntary/non-profit organisation which depends on the help of volunteers to function.

- d. The IWGB has conducted a Legitimate Interest Assessment (LIA) for this category of data processing and has concluded that legitimate interests is an appropriate lawful basis for the processing. The LIA can be provided to volunteers upon request.

⁵ GDPR Article 6(1)(f)

⁶ GDPR Article 6(1)(f)

- e. The IWGB engages data processors to assist with the processing of volunteer data. Types of processors include email servers such as gmail and electronic document storage such as Dropbox. The IWGB reserves the right to engage other processors as and when is necessary to assist with the processing of volunteer data in furtherance of the legitimate aims identified above.
9. Donor and Supporter Data
- a. The IWGB collects personal data on donors and supporters so as to carry out fundraising activities and obtain support for campaigns and other initiatives. The data concerned are names and contact information. This information is provided by the donors, supporters, or a third party which assists in the fundraising or campaigning efforts.
 - b. This data is maintained by us indefinitely or until it is requested we delete it.
 - c. The lawful basis for collecting this data is known as “Legitimate Interests”⁷. The legitimate interest we pursue is:

To obtain donations and support from individuals in order to help finance the IWGB as a voluntary/non-profit organisation and support the IWGB as a campaigning organisation.

- d. The IWGB has conducted a Legitimate Interest Assessment (LIA) for this category of data processing and has concluded that legitimate interests is an appropriate lawful basis for the processing. The LIA can be provided to donors and supporters upon request.
 - e. The IWGB engages data processors to assist with the processing of donor and supporter data. Types of processors include email servers such as gmail, electronic document storage such as Dropbox, and other processors which facilitate communication with donors and supporters, such as Mailchimp. The IWGB reserves the right to engage other processors as and when is necessary to assist with the processing of donor and supporter data in furtherance of the legitimate aims identified above.
10. Business Contacts’ Data
- a. The IWGB collects personal data on business contacts so as to be able to liaise with other organisations to achieve its aims. The data concerned are names and contact information. This information is provided by the business contacts themselves, by third party mutual contacts, or is publicly available.
 - b. This data is maintained by us indefinitely or until it is requested we delete it.
 - c. The lawful basis for collecting this data is known as “Legitimate Interests”⁸. The legitimate interest we pursue is:

⁷ GDPR Article 6(1)(f)

⁸ GDPR Article 6(1)(f)

To have a network of like-minded organisations with whom the IWGB can work to achieve its aims.

- d. The IWGB has conducted a Legitimate Interest Assessment (LIA) for this category of data processing and has concluded that legitimate interests is an appropriate lawful basis for the processing. The LIA can be provided to business contacts upon request.
 - e. The IWGB engages data processors to assist with the processing of business contacts' data. Types of processors include email servers such as gmail, electronic document storage such as Dropbox, and other processors which facilitate communication with business contacts, such as Mailchimp. The IWGB reserves the right to engage other processors as and when is necessary to assist with the processing of business contacts' data in furtherance of the legitimate aims identified above.
11. The data processing will mainly take place in the United Kingdom and EU. However some data processing may occur in the United States as this is where the cloud servers of some of our data processors are located. There is also a slight risk that processing occurs in other non-EU countries if an email or Dropbox account is accessed there. However, the IWGB discourages this as a matter of policy.
12. You have a number of rights under the GDPR, as summarized below. More detail on all of these rights can be seen in the [IWGB Data Protection Policy](#). It is important to note that as long as it is clear which right you are attempting to exercise, there is no precise wording in which your request needs to be put.
- a. *Right of Access.* You have the right to access your personal data and supplementary information. If requested, your data will be provided to you within one month, save for exceptional circumstances. For more information on this right, see the IWGB Data Protection Policy.
 - b. *Right to Rectification.* You have the right to have your personal data rectified if it is inaccurate or incomplete. For more information on this right, see the IWGB Data Protection Policy.
 - c. *Right to Erasure.* You have the right, in certain circumstances, to request the deletion or removal of your personal data. For more information on this right, see the IWGB Data Protection Policy.
 - d. *Right to Restrict Processing.* You will have the right to 'block' or suppress processing of your personal data in certain circumstances. For more information on this right, see the IWGB Data Protection Policy.
 - e. *Right to Object.* You have the right to object to the processing of your data in certain circumstances. These include if the processing is based on legitimate interests or the performance of a task in the public interest/exercise of official authority (including

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profiling), if your data is being used for direct marketing (including profiling) and if we are processing your data for the purposes of scientific/historical research and statistics. Your objection must be on grounds relating to your particular situation.

13. If you wish to exercise your right to object, your objection should be communicated to:
 - a. If you are an employee, to your line manager;
 - b. If you are a volunteer, to your main contact at IWGB;
 - c. If you are a member and the request relates to membership data, to Sebastien Flais (contact information below);
 - d. If you are a member and the data relates to a case you have or had with the Legal Department, to your caseworker;
 - e. For any other reason, or for more than one of the above, to the IWGB (contact information below).
14. If an objection is received, the IWGB will cease processing your data unless:
 - a. We can demonstrate compelling legitimate grounds for the processing, which override your interests, rights and freedoms; or
 - b. The processing is for the establishment, exercise or defence of legal claims.
15. If you feel the IWGB has not processed your data in compliance with the law, or has in some other way breached your data protection rights, you can make a complaint to the Information Commissioner's Office (ICO). The ICO's contact details are:
 - a. Helpline: 0303 123 1113
 - b. Live chat: <https://ico.org.uk/global/contact-us/live-chat/>
 - c. Email: casework@ico.org.uk
 - d. Website: <https://ico.org.uk/>