

May 2018

General Data Protection Regulation (GDPR) – consent and other lawful bases

The Member Registration Form and NFWI Privacy Policy explain that “*the WI will use the details you provide for our legitimate interests to administer your membership (and if you are an officer, a committee member or have another role, that position)*”.

This means that if your federation or WI is handling personal information for the specific purpose of administering an individual’s membership or position (for example adding a member to the MCS, amending her details in the MCS or sending her correspondence related to her membership or position) you **do not** need to ask for consent, as the lawful basis for the processing of this information is our legitimate interest as an organisation.

Additional data processing activities (instances where you process personal information in addition to administering membership) **will** require you to identify your lawful basis for processing that personal information and then communicate this with members.

This might mean that in addition to the NFWI privacy notice included on the Member Registration Form you will need a separate privacy notice covering the additional processing activities of your WI or federation.

It is important to remember that there are multiple lawful bases, and consent is only one of them.

Even when your processing activities fall under the scope of administering membership, in order to be GDPR compliant it’s important to ensure that your WI or federation understands and documents the information held, what its purpose is, how long it is retained for etc.

If you have any questions related to GDPR you can contact:

The Information Commissioner’s Office (ICO):

- <https://ico.org.uk/>
- 0303 123 1113

or the NFWI:

- dataprotection@nfwl.org.uk
- 020 7371 9300