



PRIVACY NOTICE

The Institute of Masters of Wine (**IMW**), UK registered company number 1059707, 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 below.

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Important information and who we are

Purpose of this privacy notice

This privacy notice aims to give you information on how the **IMW** collects and processes your personal data, including any data you may provide through this website when you sign up to our newsletter, become a student / member, purchase a product or service.

It is important that you read this privacy notice together with any other privacy notice or fair processing policy we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This privacy notice supplements other notices and privacy policies and is not intended to override them.

Controller

We have appointed a data protection officer (DPO) who is responsible for overseeing questions in relation to this privacy notice. If you have any questions about this privacy notice, including any requests to exercise your legal rights, please contact the DPO using the details set out below.

The **IMW** is the controller and responsible for your personal data (collectively referred to as "**IMW**," "we", "us" or "our" in this privacy notice).

Contact Details

If you have any questions about this privacy notice or our privacy practices, please contact our DPO in the following ways:

Full name of legal entity: The Institute of Masters of Wine

Email address: rharris@mastersofwine.org (Robyn Harris, operations manager)

Postal address: 6 Riverlight Quay, Kirtling St, Nine Elms, London, SW11 5EA, United Kingdom

Telephone number: 020 7383 9137

Complaints

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK regulator for data protection issues (www.ico.org.uk). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

Changes to the privacy notice and your duty to inform us of changes.

We keep our privacy notice under regular review. This version was last updated on [15 January] 2026. Historic versions can be obtained by contacting us.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

Third-party links

This website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy notice of every website you visit.

The data we collect about you

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We may collect, use, store and transfer different kinds of personal data about you. We may receive this data in different ways:

- **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.
- **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.
- **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 or Instagram).
- **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.

What personal information do we collect and use?

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

- **Identity data** includes first name, maiden name, last name, username or similar identifier, marital status, social media identifier, title, date of birth and gender.
- **Image data** where video capture may be used.
- **Contact data** includes billing address, delivery address, email address and telephone number(s).
- **Financial data** includes bank account and payment card details.
- **Transaction data** includes details about payments to and from you and other details of products and services you have purchased from us.
- **Technical data** includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, and other technology on the devices you use to access this website.
- **Membership / student profile data** includes your username and password, details of qualifications/experience, and other biographical information, membership information, information about your progress in the study programme, purchases or orders made by you, your interests, preferences, feedback and survey responses.
- **Usage data** includes information about how you use our website, products and services.
- **Marketing and communications data** includes your preferences in receiving marketing from us and our third parties and your communication preferences.
- Any other personal information which you choose to share with us as per section 1 above.

We also collect, use and share aggregated data such as statistical or demographic data (**aggregated data**) for any purpose. Aggregated data could be derived from your personal data but is not considered personal data in law as this data will **not** directly or indirectly reveal your identity. For example, we may aggregate your usage data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect aggregated data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy notice.

Do we process special categories of personal 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.

If you fail to provide personal data

Where we need to collect personal data by law, or under the terms of a contract we have with you, and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with products or services). In this case, we may have to cancel a product or service you have with us, but we will notify you if this is the case at the time.

How and why will we use your personal information?

We may use your personal information:

- to provide you with services, products or information you have requested. This includes:
 - Providing the study programme to students,
 - Delivering public events,
 - Providing membership services to Masters of Wine;
- to provide further information about our work, services, activities or products (with consent where necessary);
- to process your payments and administer membership and our course and events;
- to answer your questions/ requests and communicate with you in general;
- for our research purposes and to further the work of the IMW in general;
- 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; e.g. to register, administer and personalise online accounts;
- to process your application for a job with us;
- to administer your employment/ volunteer/ other working relationship with us (for example, to pay your salary or honorarium);
- for training and/or quality control;
- to audit and/or administer our accounts;
- 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);
- for the prevention of fraud or misuse of services; and/or
- for the establishment, defence and/or enforcement of legal claims.

Lawful bases

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- Where we need to perform a contract that we either have or will enter into with you.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- Where we need to comply with a legal obligation.

Generally, we do not rely on consent as a legal basis for processing your personal data although we will get your consent before sending third party direct marketing communications to you via email or text message. You have the right to withdraw consent to marketing at any time by contacting us.

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 enquiries, 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.

Change of purpose

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

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.

In determining the appropriate retention period for personal data, we take into account the amount, nature and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal, regulatory, tax, accounting or other requirements.

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:

- 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;
- parties administering our pension contributions; and
- 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.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

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.

Security/storage of and access to your personal information

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business and that are instructed on a need to know basis. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

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 study programme 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 by entering into European Commission-approved contracts or UK International Data Transfer Agreements. If you have any questions about the transfer of your personal information, please contact us.

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

Please contact us should you wish to receive further information on the specific mechanism used by us when transferring your personal data outside of the UK.

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:

- **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.
- **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.
- **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.
- **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.
- **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.
- **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 above.

No fee usually required

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we could refuse to comply with your request in these circumstances.

What we may need from you

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

Time limit to respond

We try to respond to all legitimate requests within one month. Occasionally it could take us longer than a month if your request is particularly complex or you have made several requests. In this case, we will notify you and keep you updated.