

# NWWT Privacy Policy

## 1. Who are we?

We are the only local organisation dedicated to conserving all habitats and species across North Wales for the enjoyment of people and the benefit of wildlife. We work with 46 other Wildlife Trusts, and are part of the largest UK voluntary organisation dedicated to conserving all the UK's habitats and species, whether in the countryside, towns or at sea.

We improve places for wildlife and strengthen the relationship between people and the natural environment of North Wales by promoting its value to local people. Wherever you are, our people, places and projects are never far away. Our ultimate aim is to protect and create resilient ecosystems on land and in the sea.

In 2016-17, 331 amazing volunteers contributed 17,473 hours of work to our cause, both on and off our 36 nature reserves. We estimate that these wonderful wildlife havens attract more than 130,000 visitors each year. We met 20,400 people face-to-face, and visited 4,122 children at their school. All of this is only possible because of the support of our 5,000+ members, from a wide range of backgrounds and all walks of life.

## 2. Our commitment to your privacy

We are committed to keeping the personal details of our members and supporters safe. This policy explains how and why we use your personal data, to ensure that you remain informed and in control of your information.

Any references to North Wales Wildlife Trust, the Trust, or to 'we' or 'us' refer to:

- North Wales Wildlife Trust. We are a registered charity in England and Wales, and our registered charity number is 230772.
- NWWT Trading Limited, our charitable trading company (registered company number 02453752). The company is a wholly owned subsidiary of North Wales Wildlife Trust, which trades only to raise funds for our charitable organisation.

We use three key definitions to describe people mentioned in this policy. These are definitions used by the Information Commissioner's Office (ICO), the UK's independent body set up to uphold information rights ([www.ico.org.uk](http://www.ico.org.uk))

- **'Data subject'**: this is you, one of our loyal members and supporters. As the data subject, we respect your right to control your data.
- **'Data controller'**: this is us, the North Wales Wildlife Trust. With your permission, we determine why and how your personal data is used (as outlined in this policy).
- **'Data processor'**: this is a person, or organisation, who processes your data on our behalf, with your permission. For example, this might be a mailing house who sends your membership magazine to you, on our behalf (due to the size of our organisation, it's more cost-effective to outsource ad-hoc and large-scale tasks like this).

When we work with other organisations or individuals in this way, we always set up a written contract with them to protect your data. The third parties we work with at no point 'own' your data, so you will never hear from them independently and they will always delete your data from their systems when they have completed the task in hand. We always send your data to partner

organisations securely, to minimise the risk of it being intercepted by unknown individuals and/or organisations.

We will never sell your personal data.

Should you wish to find out more about the information we hold about you, or about our privacy policy, please contact us:

Frances Cattanach, CEO  
Telephone: 01248 351541  
Email: fcattanach@wildlifetrustswales.org  
Llys Garth, Garth Road, Bangor, Gwynedd, LL57 2RT

Our office hours are Monday – Friday, 9am – 5pm.

### **3. Why do we collect your personal data?**

We use your personal data to keep in touch with you.

We will only ever collect, store and use your personal data when we have an identified purpose and reason to do so. The ICO refers to this as a 'lawful basis'. Further information about why we collect your personal data is outlined below.

#### **a) To administer your North Wales Wildlife Trust membership**

We collect your personal data to administer your membership, which may involve:

- Processing your Direct Debit subscription payments, if you have set this donation process up with us
- Sending you your membership renewal letter
- Getting in touch should there ever be any issues processing your subscription payment

The ICO define the lawful basis for processing your data for these purposes as 'contractual'.

#### **b) To send you items purchased from our online shop, including event bookings**

We collect your personal data to send you:

- items you have purchased from our online shop
- information about events you have booked onto

The ICO define the lawful basis for processing your data for these purposes as 'contractual'.

#### **c) To send you information about our work and ask for your opinion**

We also collect your personal data so that we can send you information about our work that we feel will be of interest to you. This includes your membership welcome pack, membership magazine, fundraising appeals, events, campaigning opportunities, membership, services, products, newsletter requests, feedback, competitions and other activities, as well as information about other carefully selected organisations that we work in partnership with (such as Vine House Farm's bird seed catalogue). From time to time, we may also use your personal data to ask for your opinion about our work.

This information is in addition to that outlined in sections a) and b) and is defined as 'direct marketing' by the ICO.

**i) Joint and family membership**

If you are a 'joint' or a 'family' member of our Wildlife Trust, we will address communications to all adult members listed on your membership. If you wish to update this at any point, please let us know.

**ii) Gift membership**

If your Wildlife Trust membership was purchased as a gift, we will use the address provided by the purchaser by to send you information about our work in the post.

**iii) When your membership has ended**

Unless we hear from you directly, we will continue to send you information about our work for up to 6 months after your membership has ended. This is just in case your support was cancelled accidentally, by for example changing your bank account details, and you wish to update your details with us.

Your personal data also helps us to get to know you better and to develop a 'profile' of you on our secure supporter database. This 'profile' enables us to send you the information listed above in a timely and relevant way, to suit you. For example, keeping track of the donations you make to our organisation helps us to send you information about fundraising appeals that we feel you would like to hear about. Likewise, keeping a record of your wildlife interests that you may tell us about in one of our occasional surveys helps us to send you relevant project updates.

As defined by the ICO, we use two different lawful bases for processing your data for 'direct marketing' purposes:

**i) Legitimate interest**

This is where we have identified a genuine and legitimate reason for contacting you, which crucially does not override your rights or interests.

We use legitimate interest to send you the information listed above by **post** or **telephone** (if you *are not* registered with the [Telephone Preference Service](#), and you have given us your telephone number).

**ii) Opt-in consent**

This is where you have given us express permission to contact you by particular communication channels.

We use opt-in consent to send you the information listed above by **email**, **text message** (SMS) or **telephone** (if you *are* registered with the [Telephone Preference Service](#)).

We respect your right to update the way we get in touch with you about our work at any time.

**d) To enable you to volunteer with us**

If you are a North Wales Wildlife Trust volunteer, we collect your personal data so that we can keep in touch with you about, for example:

- changes to planned volunteer work programmes that you may be taking part in

- the positive impact you have on our work, by sending you our volunteer newsletter
- dedicated volunteer thank-you events

As defined by the ICO, the lawful basis for processing your data for these purposes is 'contractual' (where administering your volunteer record) and 'legitimate interest' (when sending you information about our work).

#### **4. What kind of personal data do we collect? How do we collect it?**

##### **a) Basic information**

We will usually collect basic information about you, including your name, postal address, telephone number, email address and your bank details if you are supporting us financially.

Most of the time, we collect this data from you directly. Sometimes this is in person; other times, it is over the telephone, in writing or through an email. Occasionally we obtain information, such as your telephone number or other contact details, from external sources (*only where you have given permission for such information to be shared*).

##### **b) Getting to know you better**

We also collect information about you that helps us to get to know you better. This may include:

- information about your wildlife interests, which you tell us through our occasional membership surveys
- records of donations you've made towards fundraising appeals
- your preferences of how you would like us to contact you
- ways you've helped us through volunteering your time
- records of events you've attended, or campaigns or activities that you've been involved in

Sometimes we will collect other information about you such as your date of birth and gender. When we do so, we will be very clear as to why we are collecting such information, and we will only do so with your specific consent and permission.

We may also collect demographic and consumption data generated through geodemographic tools (such as CACI Acorn), as well as information from public registers and other publicly available sources such as Companies House, newspapers and magazines. If you do not wish your data to be collected in any of these ways, or have questions about them, please contact us.

Frances Cattnach, CEO  
Telephone: 01248 351541  
Email: [fcattnach@wildlifetrustswales.org](mailto:fcattnach@wildlifetrustswales.org)  
Llys Garth, Garth Road, Bangor, Gwynedd, LL57 2RT

Our office hours are Monday – Friday, 9am – 5pm.

Other ways in which we collect personal data to get to know you better include:

##### **i) Our website**

Our website uses 'cookies' to help provide you with the best experience we can. Cookies are small text files that are placed on your computer or mobile phone when you browse websites.

Our cookies help us:

- Make our website work as you'd expect

- Remember your settings during and between visits
- Improve the speed/security of the site
- Allow you to share pages with social networks like Facebook
- Continuously improve our website for you

For more information on our Cookies Policy, please see Annex 1 at the end of this document.

#### **c) Sensitive personal data**

We do not normally collect or store sensitive personal data (such as information relating to health, beliefs or political affiliation) about supporters and members. However, there are some situations where this will occur.

When we do so, we will be very clear as to why we are collecting such information, and we will only do so with your specific consent and permission. In these situations, we collect the data from you directly.

If you are a volunteer then we may collect extra information about you, for example:

- references
- criminal records checks
- details of emergency contacts
- medical conditions

We may also collect sensitive personal data if you have an accident on one of our reserves. This information will be retained for legal reasons, for safeguarding purposes and to protect us (including in the event of an insurance or legal claim). If this does occur, we'll take extra care to ensure your privacy rights are protected.

#### **d) Children and young people**

In line with data protection law, we will not collect, store or process your personal details if you are under 13 years of age; unless we have the express permission from your parent or guardian to do so.

If we have the permission of your parent or guardian, and you are a Wildlife Watch member, we will capture your date of birth at the point of joining. This is so that we can send you information that we feel is suitable to your age.

For further information, please see our Policy on Safeguarding Children and Vulnerable Adults.

## **5. How do we store your data?**

#### **a) Security**

All of the personal data we process is processed by our staff in the UK. However, for the purposes of IT hosting and maintenance your information may be situated outside of the European Economic Area (EEA). This will be done in accordance with guidance issued by the Information Commissioner's Office.

Electronic data and databases are stored on secure computer systems and we control who has access to information (using both physical and electronic means). Our staff receive data protection training and we have a set of detailed data protection procedures which personnel are required to follow when handling personal data.

#### **b) Payment security**

All electronic North Wales Wildlife Trust forms that request financial data will use the Secure Sockets Layer (SSL) protocol to encrypt the data between your browser and our servers.

If you use a credit card to donate, purchase a membership or purchase something online we will pass your credit card details securely to the linked payment provider (Stripe, Verifone or PayPal, depending on the transaction).

North Wales Wildlife Trust complies with the payment card industry data security standard (PCI-DSS) published by the PCI Security Standards Council, and will never store card details.

Of course, we cannot guarantee the security of your home computer or the internet, and any online communications (e.g. information provided by email or our website) are at the user's own risk.

#### **c) CCTV**

Some of our premises have CCTV and you may be recorded when you visit them. CCTV is there to help provide security and to protect both you and North Wales Wildlife Trust. CCTV will only be viewed when necessary (e.g. to detect or prevent crime) and footage is only stored temporarily. Unless it is flagged for review CCTV will be recorded over.

North Wales Wildlife Trust complies with the Information Commissioner's Office CCTV Code of Practice, and we put up notices, so you know when CCTV is in use.

#### **d) Data retention policy**

We will only use and store information for as long as it required for the purposes it was collected for. We continually review what information we hold, and delete what is no longer required.

Please see our Record Retention Policy [here](#).

## **6. Your rights**

We respect your right to control your data. Your rights include:

#### a) The right to be informed

This privacy notice outlines how we capture, store and use your data. If you have any questions about any elements of this policy, please contact us.

#### b) The right of access

If you wish to obtain a record of the personal data we hold about you, through a [Subject Access Request](#), we will respond within one month.

#### c) The right to rectification

If we have captured information about you that is inaccurate or incomplete, we will update it.

#### d) The right to erase

You can ask us to remove or randomise your personal details from our records.

#### e) The right to restrict processing

You can ask us to stop using your personal data.

#### f) The right to data portability

You can ask to obtain your personal data from us for your own purposes.

#### g) The right to object

You can ask to be excluded from marketing activity.

h) Rights in relation to automated decision making and profiling

We respect your right not to be subject to a decision that is based on automated processing.

For more information on your individual rights, please see the [Information Commissioner's Office](#).

## 7. Making a complaint

North Wales Wildlife Trust want to exceed your expectation in everything we do. However, we know that there may be times when we do not meet our own high standards. When this happens, we want to hear about it, in order to deal with the situation as quickly as possible and put measures in place to stop it happening again.

We take complaints very seriously and we treat them as an opportunity to develop our approach. This is why we are always very grateful to hear from people who are willing to take the time to help us improve.

### Our policy is:

- To provide a fair complaints procedure that is clear and easy to use for anyone wishing to make a complaint.
- To publicise the existence of our complaints procedure so that people know how to contact us to make a complaint.
- To make sure everyone in our organisation knows what to do if a complaint is received.
- To make sure all complaints are investigated fairly and in a timely way.
- To make sure that complaints are, wherever possible, resolved and that relationships are repaired.
- To learn from complaints and feedback to help us to improve what we do.

### Confidentiality

All complaint information will be handled sensitively, in line with relevant data protection requirements.

### Responsibility

Overall responsibility for this policy and its implementation lies with Frances Cattnach, CEO.

For further information on how to make a complaint, please see [click here](#).

### Information Commissioner's Office

For further assistance with complaints regarding your data, please contact the Information Commissioner's Office, whose remit covers the UK.

Information Commissioner's Office  
Wycliffe House  
Water Lane  
Wilmslow  
SK9 5AF

Telephone: 0303 123 1113  
Email: [casework@ico.org.uk](mailto:casework@ico.org.uk)

## **8. Leaving our website**

We are not responsible for the privacy practices or the content of any other websites linked to our website. If you have followed a link from this website to another website you may be supplying information to a third party.

## **9. Get in touch**

Should you wish to find out more about the information we hold about you, or about our privacy policy, please contact us:

Frances Cattanach, CEO  
Telephone: 01248 351541  
Email: [fcattanach@wildlifetrustswales.org](mailto:fcattanach@wildlifetrustswales.org)  
Llys Garth, Garth Road, Bangor, Gwynedd, LL57 2RT

Our office hours are Monday – Friday, 9am – 5pm.

We update this policy periodically.

Last updated: April 2018



## Annex 1: Use of Cookies

New TWT web platform

25 April 2018

### Our use of cookies

Our website uses cookies, as almost all websites do, to help provide you with the best experience we can. Cookies are small text files that are placed on your computer or mobile phone when you browse websites.

Our cookies help us:

- Make our website work as you'd expect
- Remember your settings during and between visits
- Improve the speed/security of the site
- Allow you to share pages with social networks like Facebook
- Continuously improve our website for you

We do NOT use cookies to:

- Collect any personally identifiable information (without your express permission)
- Collect any sensitive information (without your express permission)
- Pass personally identifiable data to third parties
- Pay sales commissions
- You can learn more about all the cookies we use below

There are two types of cookie you may encounter when using this site:

- **First party cookies:** these are our own cookies, controlled by us and used to provide information about usage of our site.
- **Third party cookies:** these are cookies found in other companies' internet tools which we are using to enhance our site.

### First party cookies

This site uses cookies in several places – we've listed each of them below with more details about why we use them and how long they will last.

#### Cookies set by this website

| Name                    | Purpose   | Typical content  | Expires              |
|-------------------------|---|--|----------------------|
| SESSxxxID               | Authentication session to prevent having to login multiple times in one browser session. This is only set if you authenticate via the site. This may happen if you purchase items from the shop or make use of our commenting | A unique id that ties the current session to a database settings table | One week             |
| cookieconsent_dismissed | This cookie collects information about whether or not the user has agreed to cookies.   | Yes/No   | 70 years<br>6 months |

## Third party cookies

We use a number of suppliers who may also set cookies on their websites' on its behalf. This site does not control the dissemination of these cookies. You should check the third party websites for more information about these.

| Provider         | Name                      | Purpose   | More info                             |
|------------------|---------------------------|---|---------------------------------------|
| Google Analytics | <u>_ga</u><br><u>_gid</u> | These cookies are used to collect information about how visitors use our site. We use the information to compile reports and to help us improve the site. The cookies collect information in an anonymous form, including the number of visitors to the site, where visitors have come to the site from and the pages they visited. | <a href="#">Google Privacy policy</a> |

Most web browsers allow some control of most cookies through the browser settings. To find out more about cookies, including how to see what cookies have been set and how to manage and delete them, visit [www.allaboutcookies.org](http://www.allaboutcookies.org)

To opt out of being tracked by Google Analytics across all websites visit <http://tools.google.com/dlpage/gaoptout>

## Annex 2: Record Retention Policy

**Comment [GC1]:** To be added