

# **Privacy Policy**

Yorkshire Wildlife Trust is committed to protecting the privacy of all its supporters and the general public who engage with us. We take our duty to processing your personal data very seriously. This policy tells you what your rights are, how and why we collect information, how we use it and what controls we have in place to protect your personal data.

We may change this document from time to time to reflect the latest view of what we do with your information. Please check back frequently; you will be able to see if changes have been made by the date it was last updated.

## Yorkshire Wildlife Trust's Data Promise

It is only with the valuable support of our 43,000 members and 800 volunteers that Yorkshire Wildlife Trust is able to achieve so much for our beloved county. To do this, it is necessary for us to securely hold and carefully use your data.

We understand that you have trusted us with your personal data and in addition to our own high standards and values we are also members of both the Institute of Fundraising and the Fundraising Regulator. Their strict policies regarding the protection of your data can be found on their websites: <u>www.institute-of-</u><u>fundraising.org.uk</u> and <u>www.fundraisingregulator.org.uk</u>.

The Trust will only use your data where we have a genuine and legitimate reason **and** we are not harming any of your rights and interests. The Trust will never at any time sell, trade or rent your details to third parties.

It is your choice how we use your data and how we contact you. You may change the way in which you receive information from us at any time:

- Email: <u>membership@ywt.org.uk</u>
- Telephone: 01904 659570
- Post: Yorkshire Wildlife Trust, 1 St George's Place, York, YO24 1GN

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

As a member, supporter or volunteer of Yorkshire Wildlife Trust you are part of our family. A family of likeminded people who want Yorkshire's wildlife, countryside and people to flourish. We just need to inspire everybody else to feel the same way!

If you have any concerns about how we may use your personal data, please feel free to contract the Trust and we will do our very best to ensure that your needs and preferences are met.

#### About us

Yorkshire Wildlife Trust is a charity registered in England and Wales (Charity No 210807) and a non-profit making company limited by guarantee registered in England (company No. 409650) at 1 St George's Place, York, YO24 1GN

This policy is also applicable to our charitable trading subsidiary Yorkshire Wildlife Services Limited (registered company number *9922108*) a wholly owned subsidiary of Yorkshire Wildlife Trust which trades only to raise funds for its parent company – Yorkshire Wildlife Trust.

#### Personal data we collect

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.

From time to time we will collect basic personal data about you like your name, postal address, telephone number, email address and your bank details if you are supporting us financially.

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 surveys or feedback
- records of donations you've made towards fundraising appeals
- your contact preferences
- 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
- Media (Photos/video) of events or volunteering activities you have participated in

Sometimes, if you are volunteering for example, we will need to collect other information about you such as your date of birth, gender, health details, criminal records and emergency contact details. We will be very clear with you that where we require to collect this information, what our reason for collecting such information is, and we would only do so with your specific consent and permission.

If an accident or incident occurs on our property, at one of our events or involving one of our staff (including volunteers) then we'll keep a record of this (which may include personal data and special category data).

#### Why we collect Personal Data

We collect your personal data to enable us to contact you to;

- Perform a contract or for administrative purposes (such as fulfil membership obligations or legal requirements);
- Inform you about our work which we feel may be of interest to you as a supporter of Yorkshire Wildlife Trust. This may include information about our campaigns, fundraising activities, volunteering and events.

We do our very best to ensure we only use your information for the purpose or purposes it was collected for and do not override your rights as an individual.

#### How we use your data

#### a) Administration or contractual purposes

We use personal data for administrative purposes including;

- receiving donations (e.g. direct debits or gift-aid instructions);
- maintaining databases of our volunteers, members and supporters;
- providing a membership benefit such as sending you our magazine;
- fulfilling an order for goods or services (whether placed online, over the phone or in person);
- helping us respect your choices and preferences (e.g. if you ask not to receive marketing material, we'll keep a record of this)

# b) Magazine

Membership magazines are provided as a benefit of our membership. We send these out by post quarterly to all our members (unless you specifically ask us not to). Please be aware that our member magazines do from time to time include a small number of advertisements, inserts, competitions and fundraising information. We do our very best to keep these relevant and to a minimum.

If you choose to unsubscribe from receiving other marketing communications we send out, you will continue to receive your subscription to the Trust's magazines. If you would like to stop receiving one of the Trust's membership magazines, you can contact us to do so at:

- Email: <u>membership@ywt.org.uk</u>
- Telephone: 01904 659570
- Post: Yorkshire Wildlife Trust, 1 St George's Place, York, YO24 1GN

## c) Internal research and analysis

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 information 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 and our own planning. Likewise, keeping a record of your wildlife interests that you may tell us about in a survey or through feedback, helps us to send you relevant project updates.

We carry out internal analysis on data relating to our supporters, donors and volunteers, to determine the success of campaigns and appeals, better understand behaviour and responses and identify patterns and trends. This helps inform our approach towards campaigning and make us a stronger and more effective organisation.

# d) Privacy

We will also hold information about you so that we can respect your preferences for not being contacted by us.

#### e) Send you information about our work and ask your opinion

We use personal data to communicate with our supporters, to promote Yorkshire Wildlife Trust and to help with fundraising and planning. This includes keeping you up to date with our news, updates, campaigns and fundraising appeals, events, activities and from time to time seeking your feedback on how we are doing. As a charity, we rely on donations and support from others to continue our conservation work.

You can decide not to receive these communications or change how we contact you at any time.

# f) Use of personal data in our marketing material

We may use your name and/or images/videos in our publications, web site and marketing communications.

Where we include Personal data from third parties in our publications (ie Jubilee club results) we will make reasonable enquiries to ensure that we are not harming any of your rights or interests.

#### Processing of data under GDPR

Under the data protection laws introduced in May 2018 we must have a lawful basis for processing your data for 'direct marketing' purposes. These include:

# i) Opt-in consent

This is where you have given us express permission to contact you by particular communication channels or where you have been a supporter in the past and we are applying the soft opt-in exception.

We use opt-in consent to send you the information listed above by **post, email, text message** (SMS) or **telephone** (if you *are not* registered with the <u>Telephone Preference Service</u>, and you have given us your telephone number).

#### ii) Legitimate interest

This is where we have identified a genuine and legitimate reason for contacting you, or using your data in our publications, Web site and marketing communications, which crucially does not override your rights or interests

We may use legitimate interest to send you relevant information by **post** or **telephone** (if you *are not* registered with the <u>Telephone Preference Service</u>, and you have given us your telephone number).

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

## Legitimate interests

Broadly speaking Legitimate Interests means we can process your personal information if we have a genuine and legitimate reason and we are not harming any of your rights and interests.

This means that when you provide your personal details to us we use your information for our legitimate business interests to undertake and promote conservation and environmental work in Yorkshire. Before doing this, though, we will also carefully consider and balance any potential impact on you and your rights.

The vision of Yorkshire Wildlife Trust is for "A Yorkshire rich in wildlife for everyone" and our mission is to "reverse the decline in Yorkshire's wildlife on land and sea."

We believe that people who share our values would love to know how to support us. We will process the personal information you have supplied to us to conduct and manage our business to enable us to give you the most appropriate marketing, information, service and products and provide the best and most secure experience. These are what we consider to be our 'Legitimate Interests'.

Examples of where we would apply legitimate interests include:

- Marketing communications: We may from time to time send postal marketing, that includes;
  - information about our campaigns and fundraising activities (appeals, raffles, donation requests) which further the aims and objectives of our Trust;
  - Information about our role in conservation activities across Yorkshire;
  - Highlighting Yorkshire Wildlife Trust membership benefits and offers;
  - volunteering opportunities and how you can help support us in different ways;
  - our events, activities and local groups;
  - products, services and offers (our own, and those of third parties which may interest you or where a benefit is received by the Trust); and
  - leaving a legacy.
- Your best interest: Processing your information to protect you against fraud when transacting on our website, and to ensure our websites and systems are secure.
- Personalisation: Where the processing enables us to enhance, modify, personalise or otherwise improve our services and communications for the benefit of our supporters.

- Internal Research and Analysis: To determine the effectiveness of promotional campaigns and advertising, our own planning, to develop our products, services, systems and relationships with you and to provide you with the most relevant information as long as this does not harm any of your rights and interests. To do this, we may make use of profiling and screening techniques of our supporter database to communicate with you effectively and efficiently.
- Due Diligence: We may need to conduct investigations on supporters, potential customers and business
  partners to determine if those companies and individuals have been involved or convicted of offences
  such as fraud, bribery and corruption.

This in no way overrides your right to tell us not to contact you.

#### Volunteering with us

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

- information of planned volunteer work programmes;
- the positive impact you have on our work, by sending you our volunteer newsletter;
- dedicated volunteer thank-you events, training and other learning opportunities.

We will also send you information about our work as a legitimate interest or opt-in consent as described above.

As defined by the ICO, the lawful basis for processing your data is 'contractual' where administering your volunteer records and 'legitimate interest' or opt-in when sending you information about our work.

#### Recruitment

Where you apply for a YWT staff role we will collect your personal data to enable us to review your application. We will ask you to review a job applicant privacy notice and seek your consent so we can use your personal data for the purposes of the recruitment.

#### Your interests

When we process your personal information for our legitimate interests, we will consider and balance any potential impact on you and your rights under data protection and any other relevant law. Our legitimate business interests do not automatically override your interests – we will not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). For more information about your rights, please see Your Rights below.

Remember, you can change the way you hear from us or withdraw your permission for us to process your personal details at any time by contacting us (see below).

#### How we obtain your details

We may collect your personal information in a number of ways:

- When you provide it to us directly
- When you provide permission to other organisations to share it with us or you have given it to a third party and you have provided permission to pass your information on to us
- From publicly available sources to keep your information up to date (e.g. the Post Office's National Change of Address database)
- From third party sources, where you have given them permission to share this (e.g. Companies House, newspapers, magazines, Charitable Trusts, etc.)

#### Holding your data securely

All the personal data we process is held securely, and processed by our staff in Yorkshire. The personal data we hold is mainly stored on secured servers in the UK and in some cases by third party providers outside of the UK. All data is held and secured in accordance with guidance issued by the Information Commissioner's Office.

The Trust follows strict internal procedures that must be followed in relation to collecting, holding and using personal data.

Some limited personal data to enable us to contact volunteers and administer Volunteer events may be held on staff and volunteer mobile devices and or paper. We have put in place processes to ensure this data is protected and up to date.

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

#### Data retention

We hold your information only as long as necessary, specific to the type of information held and subject to legal requirements including financial audits and for tax purposes.

If you decide not to support the Trust any more or request that we have no further contact with you, we will keep some basic information for a limited time in order to avoid sending you unwanted materials in the future.

#### **Payment Security**

We use third parties to process your payment information.

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

Yorkshire Wildlife Trust and the third parties we use, comply with the payment card industry data security standard (PCI-DSS) published by the PCI Security Standards Council. These third parties may 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.

#### 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 Yorkshire 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.

Yorkshire 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.

#### Sharing your information

The Trust will never at any time sell, trade or rent your details to third parties.

From time to time we may employ carefully selected third parties to provide services on our behalf, including undertake fundraising, sending mailings (including the magazine), marketing communications and for research purposes. We will use a third party where it is more cost effective for the charity to do so or we are unable to facilitate this activity internally. Please be reassured that we also ensure any company delivering services on our behalf are equally vigilant about safeguarding your data and any such activity will be subject to data processing agreements.

We only disclose information to third parties or individuals when obliged to by law, for purposes of national security, taxation and criminal investigations.

## **Children & Young People**

If you are under 18 please ensure you obtain consent from the person who has Parental Responsibility (your parent or guardian for example) before sending any personal information to Yorkshire Wildlife Trust. We do provide activities for people under 18 so we may ask your age. Before taking part please ensure you speak to your parent or guardian.

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.

If you are under 18 we will get specific consent from the person who has Parental Responsibility for us to use any media (photos/videos) in our publications, web site and marketing communication.

Please note that we will not knowingly directly market to or take orders for goods or services from persons aged under 18 years. The material we send to Wildlife watch members and young people may contain information about our work including current appeals.

As a parent or guardian we encourage you to be aware of the activities in which your children are participating, both offline and online. If your children voluntarily disclose information, this may encourage unsolicited messages. We suggest that you discourage your child from providing any information without your consent.

# Dealing with unwanted third party post

If you are receiving unwanted post from other companies it only takes a moment to register your details with the Mailing Preference Service – <u>www.mpsonline.org.uk</u>

#### Your rights

- 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.
- The right of access If you wish to obtain a record of the personal data we hold about you, through a <u>Subject Access Request</u>, this will be provided to you in writing within 30 days of receiving your request. There is generally no charge to you for provision of this information. For large, complex or repeated requests a reasonable fee may be charged for covering the costs of providing the information.
- The right to rectification If we have captured information about you that is inaccurate or incomplete, we will update it.
- The right to erase You can ask us to remove your personal details from our records. We may have
  to retain some information where there is a legal requirement or is necessary for administration or
  contractual reasons.
- The right to restrict processing You can ask us to stop using your personal data.
- The right to data portability You can ask to obtain your personal data from us for your own purposes.

- The right to object You can ask to be excluded from marketing activity.
- 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.

#### Making a complaint

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

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: <u>casework@ico.org.uk</u>

#### 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

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.

#### Links to other external websites

YWT is 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.

## Contact us

If you wish to talk about anything in our privacy policy, or the information we hold about you or make changes to your data please do get in contact with us:

- Email: <u>info@ywt.org.uk</u>
- Telephone: 01904 659570
- Post: Yorkshire Wildlife Trust, 1 St George's Place, York, YO24 1GN

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

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#### This document was last updated: February 2019