

# **Privacy Policy**

#### Introduction

The privacy and security of your personal information is extremely important to us at Yorkshire Wildlife Trust, and we take our duty to processing your personal data very seriously.

This policy explains what data we collect, as well as how and why we use your personal information, what controls we have in place to protect your data, and what your rights are and how to exercise them so that you can be confident about giving us your details.

This policy exists for the benefit of all Yorkshire Wildlife Trust supporters and service users, regardless of whether your interaction with us takes place digitally or physically.

As part of our commitment to protecting your privacy, we regularly review this policy to reflect any changes to the way we collect, store or use your information.

#### Our commitment to your privacy

It is only thanks to the individuals who engage with us that Yorkshire Wildlife Trust is able to achieve so much for Yorkshire's wildlife and wild places. To do this, it is necessary for us to securely hold and carefully use some personal data.

We are members of and accountable to numerous regulatory organisations, including the Information Commissioners Office and the Fundraising Regulator.

We will only use your data where we have a genuine and legitimate reason *and* we are not harming any of your rights and interests. We will never at any time sell, trade or rent your details to third parties. We will only ever share your information with organisations we work with who meet our high privacy standards.

#### About us

In this policy, whenever you see the words 'we', 'us', 'our' or 'Yorkshire Wildlife Trust', it refers to Yorkshire Wildlife Trust, 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 (Company No. 9922108) a wholly owned subsidiary of Yorkshire Wildlife Trust which trades only to raise funds for its parent company – Yorkshire Wildlife Trust.

This policy applies to all Yorkshire Wildlife Trust activity, including projects and partnerships where we are a lead partner. This includes but is not limited to Yorkshire Peat Partnership, Yorkshire Invasive Species Forum, Yorkshire Derwent Catchment Partnership and Wild Ingleborough.

# Your rights

Under UK data protection legislation you possess a number of rights regarding your personal data. These include:

- The right to be informed: this policy 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 Subject Access Request, 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.
- The right to opt out of automated decision making and profiling: you can ask not to be subject to a decision that is based on automated processing.

For more information on your individual rights, or how to make a Subject Access Request, please contact the Information Commissioner's Office, whose remit covers the UK.

Website: www.ico.org.uk

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

Phone: 0303 123 1113 Email: casework@ico.org.uk

Our ICO registration number is: Z1172950

## What personal data do we collect?

We will only ever collect, store and use your personal data when we have an identified purpose and reason to do so. We'll only collect the personal data we need and we'll make it clear at the point of collection why we are collecting it.

Personal data means any information which identifies you, or which can be identified as relating to you personally. The personal data you give us may include your name, email address, phone number, address, date of birth, gender, ethnicity, photos, CCTV images and 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
- donation and membership records

- 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
- photos or videos of events or volunteering activities you have participated in
- records of communications with us, including complaints

Sometimes, if you are volunteering for example, we will need to collect other information about you with your consent such as health details, criminal records and emergency contact details. We will be very clear why we need this information and how we will use and store it.

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).

## Children's Data (individuals aged 13-17)

This policy applies to all individuals aged 13 to 17 years old.

We take a cautious and risk-based approach to collecting, processing and storing the data of children aged 13 to 17 inclusive. We have undertaken a Data Impact Protection Assessment to ensure that we are processing the data of children fairly and in full accordance with all data protection laws and principals. This document is available to view on request.

#### What other data do we collect?

We may automatically collect some information as you use our digital services such as our website and online shop. This information does not identify you personally but can build up a picture of your browsing habits and actions.

These include **cookies on our website**, which are small text files which track your browsing and actions. This may include the pages you have visited, information about the device or browser you are using, any errors you encountered and data relating to any online transactions such as the order number for memberships, donations and online shop purchases. Some cookies are required to ensure our website works as expected, while others are optional and give us additional information like your areas of interest. You can choose not to enable these optional cookies when visiting our website on the pop-up banner that appears when you first visit a page.

We may also use services like **Bitly** to shorten lengthy web addresses and to monitor the usage of specific links.

With your permission, we also use other tracking code such as the **Facebook Pixel**. The Pixel records information about your browsing session, which it sends to Facebook and links to your unique Facebook user ID. This helps us to understand more about your interests and deliver relevant content to you on social media, as well as analyse the results of our advertising campaigns so we can improve in the future. No personal information is supplied to YWT as a result of the Facebook Pixel – we cannot personally identify you. Facebook may collect data such as your email address or phone number while you are browsing on our website, but we do not actively upload personal data such as email addresses to Facebook. You can disable this tracking code at any time.

For more information, including details of how to disable cookies and the Facebook Pixel, please see our Cookies Policy at www.ywt.org.uk/cookies-policy

## Why do we collect personal data?

We collect your personal data for:

- Administration or contractual purposes, such as:
  - o receiving donations (e.g. direct debits or gift-aid instructions)
  - o maintaining databases of our volunteers, members and supporters
  - o providing a membership benefit such as sending you our magazine
  - o fulfilling an order for goods or services (whether placed online, over the phone or in person)
  - o recruiting and managing staff, contractors, volunteers and secondees

#### • Communications, such as:

- emails about Yorkshire wildlife and wild places, our news, projects, campaigns, fundraising activities, volunteering and events
- our membership magazine (which may include advertisements, inserts, competitions and details about fundraising)
- o social media advertising, including details of our campaigns and fundraising activities
- phone calls to let you know about our work, gather your feedback and share details of our campaigns and fundraising activities
- o post which may include details of our campaigns and fundraising activities
- door-to-door communications which may include details of our campaigns and fundraising activities
- Internal research and analysis, including:
  - internal analysis on data relating to our supporters, donors and volunteers, to determine the success of our 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.
- Respecting your privacy:
  - we will also hold information about you so that we can respect your preferences for not being contacted by us.
  - We may use your name, photos and/or videos on our social media channels, on our website, in our emails and in our publications. We will always seek to obtain consent or make reasonable enquiries to ensure that we are not harming any of your rights or interests.
- Security on our nature reserves and venues:
  - We use CCTV at some of our premises and you may be recorded when you visit them. CCTV exists 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, our 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.

## How can we use your personal data?

Under the Data Protection Act (2018) which incorporates the General Data Protection Regulation (GDPR), we must have a lawful basis for processing your personal data. Justifications include:

#### Contractual

This is where we use your personal data for fulfilling contractual purposes, such as contacting you regarding your membership or volunteering activity and records.

#### **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, whereby we can continue to communicate with individuals who expressed a clear interest in our work prior to the introduction of the GDPR so long as we offer them a clear chance to opt-out in every message we send.

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

#### Legitimate interest

This is where we may not have express permission to contact you but we have identified a genuine and legitimate reason for doing so, which crucially does not override your rights or interests under data protection and any other relevant law.

We will process the personal information you have supplied to us to undertake and promote conservation and environmental work in Yorkshire and give you the most appropriate service and product information.

These could include:

- Marketing communications such as direct mail, which further our aims and objectives
- Acting in 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.

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).

These in no way override your right to tell us not to contact you.

## How do we obtain your personal data?

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

- When you provide it to us directly: we will always collect explicit "opt-in" consent to contact you by email, SMS, phone and post when you give us your contact details.
- From private third party sources: where you have given them permission to share this (e.g. social media, websites, newspapers, magazines, other charities, etc.)
- From publicly available sources: to keep your information up to date (e.g. the Post Office's National Change of Address database, the electoral roll, the census, etc.)

## **Updating your contact preferences**

You can change your contact preferences or "opt out" of all communications (except for contractual purposes) at any time. You can contact us on our website at <a href="https://www.ywt.org.uk/keep-in-touch">www.ywt.org.uk/keep-in-touch</a> or using the contact details at the end of this policy.

## Data storage and retention

All the personal data we hold is secured in accordance with guidance issued by the Information Commissioner's Office and in keeping with data protection legislation.

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. We continually review what information we hold and delete securely what is no longer required.

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.

## Third-party agreements

#### **Sharing your information**

We never sell supporter data to third parties. However, we may share your information with carefully selected third parties, including the Royal Society of Wildlife Trusts, who support us in fulfilling our objectives for wildlife and wild places. This support can include sending emails and magazines, advertising on social media, undertaking fundraising and conducting research on our behalf.

Please be reassured that we strive to ensure that any organisation which delivers services on our behalf is equally vigilant about safeguarding your data and any such activity will be subject to data processing agreements.

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

#### **Payment security**

Please be aware that we also use a range of carefully selected third party systems to process payments, such as payment portals embedded into our website. All electronic devices and forms that request users to input their 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.

## Making a complaint

We value every one of the compliments and comments we receive and take formal complaints about the way we work very seriously. We believe that the feedback we receive is an opportunity to improve our approach, and this is why we are always very grateful to hear from people who are willing to take the time to help us develop.

For further assistance with complaints regarding your privacy and data, please refer to our Compliments, Comments and Complaints Policy. This is available on our website at <a href="www.ywt.org.uk/compliments-comments-and-complaints-policy">www.ywt.org.uk/compliments-comments-and-complaints-policy</a> or as a hardcopy by request from our Head Office.

#### **Contact us**

If you wish to discuss anything in this privacy policy, the information we hold about you, or make a change to your data or the way in which you receive information from us, please get in contact with us via:

Email: supporter.services@ywt.org.uk Phone: 01904 659570 (Option 1)

Post: Yorkshire Wildlife Trust, 1 St. George's Place, York, YO24 1GN (Head Office)

Please note that our office hours are Monday to Friday, from 9am – 5pm.