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Privacy Policy

Policy Creation Date	April 2018
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Status	Current

1. Who are we?

Derbyshire Wildlife Trust is a charity that is wilder by nature! We have a clear vision for a Wilder Derbyshire, where people and wildlife thrive together.

We're working to deliver bold and imaginative, landscape-scale change with more wild spaces and richer habitats for nature. But we know we can't do it alone. We strongly believe everyone has a part to play in Nature's Recovery.

By inspiring and enabling people to take transformative action, we're helping to bring nature back to the heart of our communities. Through rewilding initiatives, ambitious partnerships, and community-led efforts, we're creating endless ways for nature and people to thrive together.

The Wildlife Trusts is made up of 47 individual charities that work closely together in a federated structure through their membership of The Royal Society of Wildlife Trusts, a memorandum of co-operation and a collective strategic direction. The Wildlife Trust federation also includes a range of subsidiaries, wholly owned by either an individual or group of Wildlife Trusts. Whilst operating collectively within a federated structure, it is recognised that each party is an independent organisation. To aide our collaboration as a federation, we sometimes share data with each other. At all times we follow the principle of data minimisation as set out in UK GDPR and where possible or appropriate will anonymise or pseudonymise data before it is shared.

Data sharing across The Wildlife Trusts federation is governed by a comprehensive collective Data Sharing, Processing and Joint Controllership Agreement.



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 Derbyshire Wildlife Trust, the Trust, or to 'we' or 'us' refer to:

Derbyshire Wildlife Trust. We are a registered charity in England and Wales, and our registered charity number is 222212.

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)

- '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 Derbyshire 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).

Sharing your information

We never sell your data to third parties. However, we may share your information where appropriate and where legitimate interest has been established; across the federation, including the Royal Society of Wildlife Trusts, and with carefully selected third parties 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 and analysis 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 sharing agreements.

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

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

Telephone: 01773 881188

Email: enquiries@derbyshirewt.co.uk

Derbyshire Wildlife Trust, Sandy Hill, Main Street, Middleton, Matlock, DE4 4LR

3. Why do we collect your personal data?

We use your personal data to keep in touch with you. We 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 magazine, fundraising appeals, campaigning opportunities, Wildlife Watch and other activities.

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

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.

We also use your data to analyse and refine our campaigning, advertising and other operations to increase our effectiveness and allow us to refine our audiences to make sure the ads you're seeing are relevant to you, this process could include uploading data to various advertising platforms that Derbyshire Wildlife Trust uses.

We may use your data when using social media advertising platform advertising tools, to further ensure that our advertising campaigns are as effective as possible, by making sure both our budget is used effectively and the ads that you see are relevant to you. This



means we can target based on specific characteristics and interests. We collect the data from campaigns, adverts, posts and interactions with our website and social platforms.

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.

3.1 Personal Data Collection

a) To administer your Derbyshire Wildlife Trust membership

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

- Sending you your membership welcome pack when you first join us
- Processing your Direct Debit subscription payments, if you have set this donation process up with us
- Sending you your membership magazine either by post or email
- 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 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. 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.

d) To enable you to volunteer with us

If you are a Derbyshire Wildlife Trust volunteer, we collect your personal data (including sensitive data) for the following reasons:

Communications, such as:

- Planned volunteer work or opportunities that you may be taking part in, or changes to them
- emails about our wildlife and wild places, our news, projects, campaigns, fundraising activities, volunteering and events
- sending you our volunteer newsletter

Administration or contractual purposes, such as:

- maintaining databases of our volunteers
- recruiting new volunteers

The safeguarding of young people and adults at risk:

 if we have concerns about a volunteers suitability or conduct when working with young people or adults at risk we may also share information with other Trusts across the federation, including the Royal Society of Wildlife Trusts, to help them make informed recruitment decisions around a candidates suitability for a role, which may not be flagged by disclosure and barring service checks or reference procedures.

Research and analysis, including:

 analysis on data relating to our volunteers, to determine the success of our opportunities, 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.



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

e) To enable you to take part in training and skills sessions

If you are a Derbyshire Wildlife Trust training participant, we collect your personal data (including sensitive data) for the following reasons:

Communications, such as:

- Details of the training courses and progression routes
- Resources relevant to your course or training outcomes
- Submitting and marking work

Administration or contractual purposes, such as:

- · maintaining databases of our trainees and qualifications
- Awarding body requirements
- Information on quality assurance
- To determine future courses and interest

3.2 Legitimate Interest

1. Gift membership

If your Wildlife Trust membership was purchased as a gift, we will use the address provided by the purchaser to send you information about our work in the post. This will include a 'renewal letter', which we will send you when your membership is due to expire, to see if you would like to continue supporting our charity.

2. 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 Membership 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:

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 <u>Telephone Preference Service</u>, and you have given us your telephone number).

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 <u>Telephone Preference Service</u>)

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

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 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
- Social media interactions

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.

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

Our website

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.

We use cookies, which are issued by third party service providers that continuously assess to make sure the data is secure. We collect these cookies in order to ensure that anything we do in our online advertising and campaigns are cost effective and relevant. We track how well our adverts perform and then analyse this data to make sure we can continue to make improvements.

- 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

We also use data such as email for tracking purposes. Hashed email lists are used to create targeted advertising for our fundraising and campaigning activities on social media and web platforms. Hashing means that data such as email addresses are turned into unreadable codes for security and privacy during data transfer. We delete the hashed data after a short period of time and it's not used for any other purpose.

This helps us reach new people who share similar characteristics and interests with our cause, without bothering those who have already engaged with us. It's both cost-effective and helps us grow the movement.

We may also use social media advertising tools to target people who have shown an interest in wildlife and nature. This helps us inspire new people to take meaningful action for nature and to create an inclusive society where nature matters.

For more information on our Cookies Policy, please see the relevant accordion item in the list below.

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
- information on DBS and barred volunteers obtained via other Wildlife Trusts

We may also collect sensitive personal data while you are in our care e.g. as a training participant, at an event or volunteering. 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 **Safeguarding Children and Young People** policy in the accordion list below.

5. How do we store your data?

a) Security

Most of the personal data we process is processed by our staff in the UK. All our data is stored in house and in accordance with GDPR regulations and standards.

As part of the Wilder Schools Network platform we use a third party organisation Firebase, and data is stored at Firebase data centres. Uploaded photos (Firebase Cloud Storage) and data (Firestore) will be stored in their London data centre but Firebase Authentication which is used to verify logins is all processed in the US. Only wilder school customer email addresses and passwords would be stored in the US. This is clearly stated to schools when they sign up to the Wilder Schools network.

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 Derbyshire 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 one of our approved payment providers. These include WorldPay and Stripe but are reviewed frequently.

Derbyshire 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) 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.

For further information, please see our Data Retention Policy in the accordion list below.

We would also like to state that only those who have authorisation within The Wildlife Trusts have access to your personal data and all staff are trained in data protection and are compliant in making sure that this is used in the correct manner. Those who have access to personal data will only do so for the necessary tasks and will make sure to handle this data in the safest way possible. We will never use your data for anything other than what is stated within our privacy policy.

6. Your rights

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

1. 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.

2. 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>, we will respond within one month.

3. The right to rectification

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

4. The right to erase

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

5. The right to restrict processing

You can ask us to stop using your personal data.

6. The right to data portability

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

7. The right to object

You can ask to be excluded from marketing activity.

8. 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 <u>Information Commissioner's Office.</u>

7. Making a complaint

Derbyshire 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 the Executive Director of Communities and Connection.

For further information on how to make a complaint, please see the next accordion item in the list below.

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

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:

Telephone: 01773 881188

Email: enquiries@derbyshirewt.co.uk

Derbyshire Wildlife Trust, Sandy Hill, Main Street, Middleton, Matlock, DE4 4LR

Revision History

Version History	Created/ Revised/	Updated by	Summary of Change
	Reviewed date		
1.0	April 2018		
1.2	July 2022	Ben Carter	Updated with new payment processing provider details and limited extra data use options for membership
1.3	May 2023	Kaite Helps	Updated with details on how we use and collect data to optimise digital advertising and campaigns



1.4	May 2025	Lisa Witham	Updated with training data, TWT data sharing & agreement, and wilder schools network information.

How often to review: 3 yearly

Next review date: July 2028