

# Friends of Stocker's Lake Privacy and Data Protection Policy

The privacy and security of your personal information is very important to us. This privacy policy explains how and why we use your personal data, to make sure you stay informed and can be confident about giving us your information.

By providing your information to us you consent to our collection and use of the information you provide in the ways set out in this policy. If you do not agree to this policy please do not use our sites, social media pages or services.

We may make changes to this policy from time to time. If we do so, we will post the changes on this page and they will apply from the time we post them.

## 1. Who are we?

Friends of Stocker's Lake (also known as FoSL) is a local charity established to conserve and enhance Stocker's Lake as a nature reserve and to involve local people in the running and enjoyment of it. With the help of our volunteers, we assist Herts and Middlesex Wildlife Trust (HMWT) in its management of the beautiful wetlands, meadows and woodlands that make up Stocker's Lake.

We take practical actions to help wildlife flourish. With long term strategies for the conservation and restoration of environments rich in wildlife, we want everyone to be able to enjoy and benefit from access to nature. In the face of climate change, the survival of our native wildlife now depends not only on retaining existing habitats but on the active expansion and reconnection of these green spaces.

## 2) Who we contact and for How Long

- We normally circulate information of all kinds to all members whilst they remain a member by paying an annual subscription. However we treat members living at the same address as 'joint' members and normally address one communication to all those listed at the same address unless at least one of those people instructs us otherwise.
- Unless we hear from you directly, we may continue to send you information about our work for up to about 24 months after your last paid for membership in case there were unexpected circumstances that cause(d) you to miss your renewal. To help members avoid inadvertently missing their renewal, we encourage members to pay by standing order. We also ask members to keep their details with us up to date and review the information we hold about them on renewal via a personalised renewal form or email.

## 3. Our commitment to your privacy.

We are committed to keeping the personal details of our members 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 Friends of Stocker's Lake, FoSL or to 'we', 'our' or 'us' refer to: Friends of Stocker's Lake. We are a registered charity in England and Wales, and our registered charity number is 1080501. 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 members. As the data subject, we respect your right to control your data.
- ‘Data controller’: this is us, Friends of Stocker's Lake. With your permission, we determine why and how your personal data is used (as outlined in this policy).
- ‘Data processor’: this is a person on our Committee who processes your data on our behalf, with your permission.

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 use the contact details in section 11. *Get in touch* at the end of this policy.

#### **4. About the personal data we collect**

We will collect and store the personal data you provide on your application form plus any subsequent changes you make. We will only use that information if and when we have one of the following kinds of reasons for doing so.

##### **a) To administer your FoSL membership which may involve (lawful basis):**

- Sending you information when you first join us;
- Collecting your subscription;
- Sending you your membership renewal letter; and
- Getting in touch should there ever be any issues processing your subscription payment to FoSL.

##### **b) To send you information about events you may wish to attend or have booked onto. (contractual reasons)**

##### **c) To send you information about our work and ask for your opinion. (direct marketing reasons)**

This includes:

- your membership newsletter;
- fundraising appeals;
- events, campaigning opportunities;
- membership services;
- newsletter requests;
- feedback and or your opinion about our work and other activities; and
- occasional information about other carefully selected organisations with whom we work in partnership such as HMWT.

Your personal data also helps us to send you the information listed above in a timely and relevant way, that suit you. 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 does not override your rights or interests. We use legitimate interest to send you the information listed above by post or telephone (if you have given us your telephone number) or email (if you have given us your email address).

## **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, post, text message (SMS) or telephone. 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 FoSL 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 relevant newsletters
- 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).

## **e) To meet our legal obligations**

We collect personal data in order to comply with legal obligations such as providing information to bodies such as the Charity Commission.

The ICO define the lawful basis for processing personal data for these purposes as 'legal obligation'.

## **f) To enable effective functioning of our organisation**

We collect personal data to enable Fosl to operate effectively in a variety of ways such as:

- responding to complaints and comments;
- complying with regulators e.g. Fundraising Preference Service, Fundraising Regulator;
- safeguarding, health and safety, security;
- maintaining records of reserve management and local wildlife;
- maintaining biological and geological records;
- liaising with Affinity Water (the landowner) or their successor and HMWT about conservation activities;
- running engagement activities such as events and competitions;
- evaluating events, campaigns and website activity; and
- research and statistical analysis.

The ICO define the lawful basis for processing personal data for these purposes as 'legitimate interest'.

# **5. 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(s) and email address from you directly. Sometimes this is in person; other times it is over the telephone, in writing or through an email.

### ***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 about;
- records of donations you have made, for example towards fundraising appeals;
- your preferences of how you would like us to contact you;
- ways you have helped us through volunteering your time; and

- Sometimes we may collect other information about you such as your date of birth and gender. If 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 do not collect demographic and consumption data generated through geodemographic tools (such as CACI Acorn), or information from public registers and other publicly available sources such as Companies House, newspapers and magazines.

### *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 you. However, there could be some situations in the future where this could occur. If that happens 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 would collect the data from you directly.

However if you are a committee member, trustee or volunteer then we may collect extra information about you, for example:

- references;
- criminal records check;
- details of emergency contacts; and
- medical conditions.

We may also collect sensitive personal data if you have an accident on the reserve. 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). Should this occur, we will take extra care to ensure your privacy rights are protected.

### *d) Children and young people*

Persons under 18 cannot become members and have their personal data collected and stored without the express consent of an adult who has parental responsibility for them, usually their parent(s).

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

### **a) Security**

All of the personal data we collect is processed by a committee member using their personal computer. However, for the purposes of IT hosting and maintenance your information may be situated outside of the UK. This will be done in accordance with guidance issued by the Information Commissioner's Office.

b) Payment security: We do not currently ask for financial data but should we do so in the future any electronic FoSL forms that request financial data will use the Secure Sockets Layer (SSL) protocol to encrypt the data between your browser and our servers. 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.

### **b) Data retention policy**

- Personal data will be deleted immediately on request unless that individual has given us permission to claim gift aid and has made a payment and or donation on which gift aid has not yet been claimed. In that case the personal information will be deleted once that claim has been accepted by HMRC which will normally be within 12 months of the request being made.

- ii. Membership paper records (if any) will be shredded and electronic records deleted when an individual ceases to be a member. This occurs during the third year that the individual has not renewed their membership following a final request to do so.
- iii. Otherwise information will only be stored 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.

## 7. 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 normally 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 on finding that error or at your request whichever is the sooner.

### 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 do not undertake these processes.

## 8. Making a complaint

FoSL 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 on our Committee 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; and
- 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**

- i. Overall responsibility for this policy and its implementation lies with the FoSL Committee Chair.
- ii. If you have any concerns or wish to give feedback then please contact us please contact our Committee member with responsibility for Data Protection. Please see our web site for contact details.

### **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

## **9. Links to third party websites**

Our websites contain links to third party websites that we believe may be of interest to our website visitors. This privacy policy only governs our website and we are not responsible for the privacy policies that govern third party websites even where we have provided links to them. If you use any link on our website we recommend you read the privacy policy of that website before sharing any personal or financial data.

## **10. Social media sites**

We currently operate social media pages on Facebook and Twitter and may add other(s) in the future. Although this policy covers how we will use any data collected from those pages it does not cover how the providers of social media websites will use your information. Please ensure you read the privacy policy of the social media website before sharing data and make use of the privacy settings and reporting mechanisms to control how your data is used.

## **11. Get in touch**

Should you wish to find out more about the information we hold about you, or about our privacy policy, please contact our Data Protection Officer who is also currently our News Letter Editor. (Please see our web site ([www.fosl.org.uk](http://www.fosl.org.uk)) for contact details).

We review this policy annually and update as required.

**Approved by Committee 04/05/2021**

**Last updated: May 2021**