

Privacy Policy

1. Who are we?

The Wildlife Trust for Lancashire, Manchester and North Merseyside is a Registered Charity (No. 229325) and a membership organisation; we are one of 47 Wildlife Trusts and together we are the largest voluntary organisation dedicated to all aspects of wildlife conservation in the UK.

2. Our Commitment to your privacy

The Lancashire Wildlife Trust is committed to protecting your privacy. It is very important to us and we respect anyone's concerns about maintaining it. This privacy policy tells you how and why we use your personal data, to ensure that you remain informed and in control of your information.

Any references to The Wildlife Trust for Lancashire, Manchester and North Merseyside, Lancashire Wildlife Trust, or to 'we' or 'us', 'the Trust' or 'LWT' refer to:

- The Lancashire Wildlife Trust Limited. We are a registered company limited by guarantee and a registered charity in England and Wales, and our registered charity number is 229325.
- Brockholes Enterprises Limited, our subsidiary trading company; (registered company number 07248427). The company is a wholly owned subsidiary of The Lancashire 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 enshrined in GDPR and 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. As the data subject, we respect your right to control your data.
- 'Data controller': this is us, the Lancashire Wildlife Trust. We determine why and how your personal data is used (as outlined in this policy).
- 'Data processor': this is an organisation that processes data on behalf of LWT or at LWT's discretion for a specific activity in connection with our work. LWT takes full responsibility for what they do.

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:

Company Secretary

Telephone: 01772 324129

Email: info@lancswt.org.uk

The Barn, Berkeley Drive, Bamber Bridge, Preston, PR56BY

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 Lancashire Wildlife Trust Membership, and your donations

When you become a member of the Trust, we will create a record for you on our secure database. Access to these records is restricted to a small team of dedicated and trained staff who will respect your personal information.

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 renewal letter
- Getting in touch should there ever be any issues processing your subscription payment
- To welcome you (via telephone and email) and answer any queries you may have

The ICO define the lawful basis for processing your data for these purposes as 'contractual'. We will use carefully selected third parties to help us in delivering this for you, further details can be found in section 6.

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

- Sending you a thank you letter or email
- Getting in touch should there ever be any issues processing your donation
 - Inviting you to a special event in relation to your donation or membership
- **i) Joint and family membership**
 If you are a 'joint' or a 'family' member of our Wildlife Trust, we will address communications to all those listed on your membership. In the case of communications around Direct Debits, we will only address contact to the relevant individual. 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. 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.
- **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.

The lawful basis for processing your data for these purposes may be 'contractual' or 'legitimate interest'.

b) To send you items purchased from our online shop and administer event bookings

We collect your personal data to send you:

- items you have purchased from our online shop
 - Information about the events you have booked onto and any tickets required

The lawful basis for processing your data for these purposes is 'contractual'.

c) To send you information about our work, services 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 Lapwing magazine, fundraising appeals, campaigning opportunities, feedback, events and competitions, as well as information about

other carefully selected organisations that we work in partnership with (such as Vine House Farm's bird seed catalogue).

We may also send you information about our education services, contracts and consultancy services, conference facilities and weddings where relevant, and 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 interpreted as 'direct marketing' 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 (see section 3c) 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 Lancashire 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
- Trust events
- Training, news, volunteering and employment opportunities
- Updates to your volunteering records
- Any relevant information to allow you to safely participate in volunteering sessions

- For certain partnership projects, we will share your data with partners running volunteering sessions for the purpose of conducting the sessions safely and ensuring you have all the information you need to participate. If this is the case, we will let you know. We will also ensure a data sharing agreement is in place with the partner to keep your information safe, and ensure it is only used for the intended purpose.

The lawful basis for processing your data for these purposes may be 'contractual' and 'legitimate interest' (when sending you information about our work).

e) If you have made a general enquiry, which we think is better handled by another local Trust, we will pass this enquiry on

The lawful basis for processing your data for these purposes may be 'contractual' and 'legitimate interest' (when sending you information about our work).

f) To process a job application you have submitted

As part of any recruitment process, the Trust collects and processes personal data relating to job applicants. Full details can be found in our Job Application Privacy Notice

https://www.lancswt.org.uk/sites/default/files/2018-08/LWT%20Job%20Applicant%20Privacy%20Notice%20May%202018_0.pdf

g) To respond to an enquiry you have made about our services

The Trust offers a number of services through primary purpose trading and our subsidiary company Brockholes Enterprises Ltd. Services include consultancy, contracts and maintenance, education training and services, weddings, conferences and special events. We will only hold information in order to deal with your enquiry, and up to a period of 2 years to allow us to monitor booking trends to inform our business.

h) To buy or sell goods or services

We collect personal data to comply with contractual responsibilities when we buy and sell goods and services from others.

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

i) To meet our legal obligations

We collect personal data in order to comply with legal obligations such as providing information to bodies such as HMRC, Charity Commission, Companies House, HSE.

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

j) To enable effective functioning of our organisation

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

- responding to complaints,

- complying with regulators eg Fundraising Preference Service, Fundraising Regulator
- safeguarding, health and safety, security
- maintaining records to comply with donor requirements
- maintaining historical records of reserve management and biological field records
- liaising with landowners and tenants about conservation activities
- running engagement activities such as events and competitions
- evaluating events, campaigns and website activity
- research and statistical analysis

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

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).

We use a carefully vetted third party fundraising agency to recruit members on our behalf and to make telephone calls. You can find more information about this in the 'Data Sharing' section.

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
- If you have made a legacy pledge

Sometimes we will collect other information about you such as your date of birth and gender, or your photograph. 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.

Once again, most of the time we collect this data from you directly.

We may also collect demographic and consumption data generated through geodemographic tools (such as CACI Acorn), as well as information related to your wealth. This may include 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.

Data Team

Telephone: 01772 324129

Email: info@lancswt.org.uk
The Barn, Berkeley Drive, Bamber Bridge, Preston, PR45BD

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 use of cookies, please see the Cookies Policy section.

ii) Third parties

We use third party organisations to support our work. These third parties are required to be bound by the principles of this privacy policy and will explain that they are working on our behalf. We always check the wording used when your information was originally collected, to make sure that we only contact people who have actively expressed an interest in receiving information from the Trust.

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 Safeguarding Policy <https://www.lancswt.org.uk/about-us/safeguarding>

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 LWT forms which request credit card or bank details use the SSL (Secure Sockets Layer) protocol for encryption. Most browsers (Microsoft Explorer, Mozilla Firefox, Safari, etc) support SSL.

If you use a credit card to donate, purchase a membership or purchase something online we will pass your credit card details securely to our payment provider (Stripe). Other payment methods (e.g. ApplePay) are handled in a similar manner.

The Lancashire 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.

The link between your browser and the server is secure if your browser displays a small padlock or key symbol somewhere in the frame, or the address bar shows a web address beginning <https://> (rather than <http://>).

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 the Lancashire 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.

The Lancashire 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

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 what is no longer required. Each year we update our data registers and re assess retention periods. Personal data relating to our principal objective of conservation may be held in our archive which is indexed by location and is not searchable by data subject.

6. Data Sharing

The Lancashire Wildlife Trust will never sell your personal data. On occasions, we will work with carefully selected organisations where it is necessary for us to share your data, or request them to process it on our behalf, in order to fulfil our obligations to you. Each organisation is bound by our terms within the data sharing agreements and data processing agreements we have in place, so we can always ensure your data is safe and only used for the intended purpose.

This occurs in the following ways:

a) Membership

- We use a carefully selected third party to help us welcome you to the Trust by telephone
- We use a carefully selected fundraising agency to help us recruit members and grow support for our cause
You can find out more about these here <https://www.lancswt.org.uk/support-us/about-our-fundraising>
- We use Responsible Mailing Ltd to help us mail out your Lapwing Magazine and membership packs, and on occasion we will enlist their help to send out appeal mailings
- We use Mail Chimp, a secure email provider to send you your email newsletters

b.) Volunteering

- If you have expressed an interest in volunteering for a partnership project, we will share details with partners in order to help facilitate that volunteering. We will let you know if this is the case

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 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](#).

8. Making a complaint

The Lancashire 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 Director of Marketing and Fundraising.

For further information on how to make a complaint, please 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

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:

Data Team

Telephone: 01772 324129

Email: info@lancswt.org.uk

The Barn, Berkeley Drive, Bamber Bridge, Preston, PR56BY

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

If you are a supporter and would like to update your contact preferences, please let us know:

Membership Team

Telephone: 01772 324129

Email: membership@lancswt.org.uk

The Barn, Berkeley Drive, Bamber Bridge, Preston, PR56BY

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

If you are a volunteer and would like to update your contact preferences, please let us know:

Volunteer Team

Telephone: 01772 324129 (Mon-Fri 9am-5pm)

Email: Volunteer@lancswt.org.uk

We update this policy periodically.
Last updated: May 2022