

Privacy and Cookies Policy

A policy describes what we do and how we do it as an organisation. It is a set of agreed principles which set out a course of action adopted by our staff and volunteers. It will often include acceptable methods, behaviours, and an approved procedure. It is usually internal, although some organisational policies are expected to be publicly accessible.

Version Control

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Version	Date	Changes made by	Reason for change
2	July 2023	Dianne Perkins	Update of information, new template.

1.1. Introduction

Essex Wildlife Trust (EWT) is a leading nature conservation charity based in Essex. We are part of the federation of 46 Wildlife Trusts around the UK with 38 in England, 5 in Wales and Trusts in Scotland, Northern Ireland, the Isle of Man and Alderney.

Within the context of this policy 'EWT', 'we' and 'us' means the charity and its associates including:

- Essex Wildlife Trust Ltd (Charity Number 210065, Company Number 00638666);
- Essex Wildlife Sales Ltd (Company Number 02548617):



- Essex Ecology Services Ltd (Company Number 02853947):
- Thameside Nature Park Ltd (Company Number 07151955):
- Chafford Gorges Ltd (Company Number 05189256); and
- Wildlife Fundraising (Central) Ltd (Company Number 08372218).

1.2. Scope

This policy explains how and why we use your personal information, to ensure that you remain informed and in control of your information. It also set out your rights in relation to our processing of your personal information. Any references to Essex Wildlife Trust, EWT, the Trust, or to 'we' or 'us' refer to:

- Essex Wildlife Trust (Registered as a charity in England and Wales, number 210065, and as a company in England and Wales, registration number 638666);
- Essex Wildlife Sales Limited, our charitable trading company (registered as a company in England and Wales, registration number 02548617), a wholly owned subsidiary of Essex Wildlife Trust, which trades only to raise funds for our charitable organisation;
- Essex Ecology Services Ltd (registered as a company in England and Wales, registration number 02853947), a wholly owned subsidiary of Essex Wildlife Trust, which provide ecological consultation services, trading to raise funds for our charitable organisation;
- Thameside Nature Park Ltd (Company Number 07151955), a wholly owned subsidiary of Essex Wildlife Trust;
- Chafford Gorges Ltd (Company Number 05189256), a wholly owned subsidiary of Essex Wildlife Trust; and
- Wildlife Fundraising (Central) Ltd (Company Number 08372218), a company owned and operated by 8 separate Wildlife Trusts, to facilitate the recruitment of new members for member trusts.

2. Purpose of Policy

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' for processing your personal information.

Further information about why we collect your personal data is outlined below.

2.1. To administer your Essex 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 renewal letter
- Getting in touch should there ever be any issues processing your subscription payment.

The ICO defines the lawful basis for processing your personal information for these purposes as 'contractual'.

- We collect your personal data to send you:
 - Items you have purchased from us which may include event bookings.
 - Information about events you have booked onto.

The ICO defines the lawful basis for processing your personal information for these purposes as 'contractual'.

2.2. To send you information about our work

We also collect your personal information so that we can send you information about our work that we feel may be of interest to you. This includes fundraising appeals, events, campaigning opportunities, membership, services, products, newsletter requests, feedback, competitions and other activities, as well as information about other carefully selected organisations with whom we work in partnership with (such as Vine House Farm's bird seed catalogue). This information is in addition to that outlined above and is defined as 'direct marketing' by the ICO.

Your personal information 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 personal information for 'direct marketing' purposes:

- **Legitimate interest** - 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.
- **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 post, 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 and will honour your consent choices over and above any examples of Legitimate Interest.

2.3. To enable you to volunteer with us.

If you are an Essex Wildlife Trust volunteer, we collect your personal information so that we can keep in touch with you about, for example:

- changes to planned volunteer work activities that you may be taking part in.
- the positive impact you have on our work, by sending you our volunteer newsletter.
- thank-you events.
- contacting next of kin in case of an emergency i.e., for safeguarding reasons.

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

2.4. What kind of personal information do we collect? How do we collect it?

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 personal information 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).

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 regarding 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

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.

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

Very occasionally we also obtain personal information from external sources. For example, we may check against Royal Mail's National Change of Address database to ensure that the address we have listed for you is up to date. We know moving to a new house can be a busy time and appreciate that you don't always have the chance to send us your new address. By undertaking this exercise, we can update your record without you needing to get in touch.

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 personal information to be collected in any of these ways, or have questions about them, please contact us.

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

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 to:

- 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, Twitter, or Instagram; and

- Continuously improve our website for you.

For more information on our Cookies Policy, please refer to the separate Cookie Policy at the end of this document.

Third parties

From time to time we may pay for the contact details of people who might be interested in hearing from us in future. Before we purchase contact information, we always check the wording used when your personal information was originally collected, to make sure that we only contact people who have actively expressed an interest in receiving information from third parties. When providing permission for third party organisations to share your personal information you should check their Privacy Policies carefully to understand fully how they will process your personal information

Sensitive personal information

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 may be some situations where this could 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 sensitive personal information from you directly.

Volunteering with Essex Wildlife Trust

If you are a volunteer then we may collect extra information about you, for example:

- References.
- Disclosure and barring services checks.
- Details of emergency contacts.
- Medical conditions

Accidents and/or Personal Injury

We may also collect sensitive personal data if you have an accident at any site where we have responsibility, such as our reserves, visitor centres and offices. 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). We may have a responsibility to provide this information to the Health and Safety Executive. If this does occur, we will take extra care to ensure your privacy rights are protected.

Children & 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 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. However, this information can be, and normally will be, deleted upon request.

For further information, please see our Safeguarding Policy on our website.

2.5. How do we store your data?

Security

All of the personal information we process is processed by our staff in the UK. However, for the purposes of IT hosting and maintenance your personal 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.

As an example, when you submit a sighting to the Essex Biological Records Centre, there is a chance that some personal data could be extrapolated from your submission. Records data may be stored on servers hosted in the United States by Microsoft (Azure) or Amazon (AWS, or Amazon Web Services). We, and our IT provider, have satisfied ourselves that the security of these servers and the data they hold exceeds the minimum standards required under UK and EU legislation. 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 information.

Payment security

All electronic Essex Wildlife Trust forms that request financial information will use the Secure Sockets Layer (SSL) protocol to encrypt the information 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 our payment providers. Our payment providers are:

- Barclaycard Payment Solutions, both directly through a Card Processing Terminal and via SagePay integration with our computer system (in the membership, administration and fundraising offices);
- Lloyds CardNet (across the rest of the Trust's physical locations);
- iZettle (for mobile or 'pop-up' shop locations where a normal payment terminal is impractical); and
- Stripe and PayPal on our website.

Please ask if you would like to know which provider is being used when you make the transaction.

Essex 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 for longer than necessary to protect the assets of Essex Wildlife Trust.

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 Essex 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. Essex 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.

Data retention policy

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 any that is no longer required.

3. Cookies policy

Our websites use cookies in several places - we've listed each of them below with more details about why we use them and how long they will last.

Cookies set by this website:

Name	Purpose	Typical Content	Expires
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SESSxxxID	Authentication session to prevent having to login multiple times in one browser session. This is only set if you authenticate via the site. This may happen if you purchase items from the shop or make use of our commenting	A unique id that ties the current session to a database settings table	One week
hasjs	This helps the website understand browser JavaScript functionality	An on/off flag that denotes whether or not the browser supports Javascript	On site exit
Online forms NO CACHE	This cookie is essential for our webforms to operate. It is set only for those people using the form, and prevents the browser from storing the information you enter		This cookie is deleted when you close your browser.
Cookie-agreed	This cookie collects information about whether or not the user has agreed to cookies	Yes/No	100 days

Cookies set by the Essex Biological Records Centre (www.essexwtrecords.org.uk):

Name	Purpose	Typical Content	Expires
SESSxxxID	Authentication session to prevent having to login multiple times in one browser session. This is only set if you authenticate via the site. This may happen if you purchase items from the shop or make use of our commenting	A unique id that ties the current session to a database settings table	Three weeks
hasjs	This helps the website understand browser Javascript functionality	An on/off flag that denotes whether or not the browser supports Javascript	On site exit
Cookie-agreed	This cookie collects information about whether or not the user has agreed to cookies	Yes/No	100 days

3.1. Third party cookies

We use a number of suppliers who may also set cookies on our websites on its behalf. This site does not control the dissemination of these cookies. You should check the third party websites for more information about these.

Provider	Name	Purpose	More Info
Google Analytics	- utma - utmb - utmc - utmz _gat _ga _gid	These cookies are used to collect information about how visitors use our site. We use the information to compile reports and to help us improve the site. The cookies collect information in an anonymous form, including the number of visitors to the site, where visitors have come to the site from and the pages they visited	Google Privacy: golicy:
AddThis	- atu	These cookies are created by the AddThis social sharing site.	AddThis Privacy: Policy

	vc xtc uid uv c ui t ps c	AddThis does collect some information such as which web page you came from, which type of browser you are using, and your general geographic location. If you use the AddThis tool to share content they aggregate data about what pages are shared, when, and how. They also assign your web browser a unique identifier. This ID doesn't, and can't, say anything about you, it's a random series of numbers and letters used to distinguish users from each other	AddThis Data Collection OgtOut (NB. AddThis is a product operated by Oracle: www.oracle.com)
Stripe	_stripe_mid _stripe_sid	Stripe is a payment processor which we use to process credit and debit card payments on our website. This may be for events, memberships or charitable donations. These cookies enable you to make these payments.	Strige Privacy: Policy
FontDeck		FontDeck sets a single session cookie for each font requested. Each cookie contains (nothing but) a random string used solely as part of our caching and font security measures. The cookies are removed as soon as the browser is closed (or the session otherwise ends). They contain no personal information and are not used for gathering analytics or tracking at a personal or aggregate level. Their sole purpose is to check whether we should serve the webfont from cache or not.	FontDeck Privacy: Policy
Wufoo	Wildlifetrusts40	This is a session ID cookie used identify unique visitors completing forms on our site. If you have your browser set to reject cookies the forms may not work correctly	Wufoo Privacy Policy
Twitter	twll tfw_exp guest_id auth token	The main business activity is: Social Networking Services. Where Twitter acts as a third party host, it collects data through a range of plug-ins and integrations, that is primarily used for tracking and targeting.	Twitter Privacy Policy
Facebook	_fbp, fr	Used by Facebook for sharing content, conversion tracking, optimisation, creating audiences for Facebook Ads and to deliver a series of advertisement products such as real time	Facebook Privacy

		bidding from third party advertisers.	
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Most web browsers allow some control of most cookies through the browser settings. To find out more about cookies, including how to see what cookies have been set and how to manage and delete them, visit www.allaboutcookies.org

4. Policy Statement

EWT are committed to keeping the personal information of our members, supporters, staff, volunteers and partners safe and adhering to the data protection legislation and guidance.

5. Procedure

We respect your right to control your personal information These include:

The right to be informed.

This privacy notice outlines how we capture, store and use your personal information. If you have any questions about any elements of this policy, please contact us at the address below.

- The right of access
- If you wish to obtain a record of the personal information we hold about you, through a Subject Access Request, we will respond within one month of receipt of your request
- The right to rectification
- If we have captured information about you that is inaccurate or incomplete, we will update it.
- The right to erasure
- You can ask us to remove or randomise your personal details from our records.
- The right to restrict processing.
- You can ask us to stop using your personal information.
- The right to data portability
- You can ask to obtain your personal information 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 contact the Information Commissioner's Office or visit their website at www.ico.org.uk.

5.1. Making a complaint

Essex Wildlife Trust want to exceed your expectations in everything we do. However, we know that there may be times when we may 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. 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

- 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 Andrew Impey, CEO.

For further information on how to make a complaint, please see our Complaints Policy on this website.

Information Commissioner's Office

For further assistance with complaints regarding your personal information, please contact the Information Commissioner's Office, whose remit covers the UK.

Information Commissioner's Office
Wycliffe House Water Lane Wilmslow SKGSAF

Telephone: 03031231113 Email: casework@ico.org.uk

5.2. 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 our website to another website, you may supply information to a third party.

5.3. 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 Protection Officer
Telephone: 01621
862960
Email:
dataprotection@essexwt.org.uk
Post: Abbots Hall Farm
Great
Wigborough
Colchester
C057RZ

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

We update this policy periodically. Last updated: March 2023

5.4. Definitions

Personal information can be anything that identifies and relates to a living person. This can include information that, either by itself, or when put together with other information, can be used to identify you. For example, this could be your name and contact details. We use three key definitions to describe people 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. As the data subject, we respect your right to control your personal information, which is also referred to as 'Personal Data.'

Data controller:

This is us. With your permission, we determine why and how your personal data is used (as outlined in this policy).

Data processor:

This is the 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).

6. Appendices

- 1.1. Appendix 1 – Subject Access Request Form

Essex Wildlife Trust

You have the right to ask for copies of your personal data we store and use. This is your right of access, also known as making a subject access request or SAR. We'll normally respond at the latest within one calendar month of receiving your request. There may be times where we need longer, or we may need to charge a reasonable fee for admin costs. We'll let you know if this is the case.

You don't have to use this form to ask for copies of your data, but it's helpful for us to know what you're looking for so we can respond fully and promptly.

Please send your completed form to us using the contact details at the bottom of the page.

You can read more about your right of access by visiting:

<https://ico.org.uk/your-data-matters/your-right-to-get-copies-of-your-data/>

Subject Access Request

Who's making this request?

We're asking for your contact details so we can send your response and discuss your request with you (if needed). You only need to give us relevant details. For example, you only need to give us your postal address if you'd like us to respond by post or if you think it would help us identify you. We may ask you for proof of ID if we feel it's reasonable and proportionate. The timescale for responding to your request will start when we receive this.

Your name

Contact number

Email address

Postal address

Are you making this request on behalf of someone else?

Yes

No (Please ignore next section)

Please provide contact details of the person you are making the request for.

If you're making the request on behalf of someone else, we need to know who they are and their contact details in case we need to get in touch.

Name of other person

Contact number

Email address

Postal address

Other contact information for the person you are making the request for

You also need to give us proof of your authority to act on their behalf. For example, this could be written authorisation from them or a relevant power of attorney.

Please send proof of authority together with this form when you make your request.

Yes, I've got proof of my authority to act on someone else's behalf and I'll include it with my form. (Please move to section four.)

No, I haven't got any proof of authority yet, but will send it at a later date. I understand you can't action my request until you receive this information.

How would you like us to respond to you?

We'll try and respond to you in the way that suits you. Please let us know if you need us to make any adjustments for you e.g., large font.

Email Post Other (please specify)

What personal data are you requesting?

If you know exactly what personal data you're looking for, it's helpful if you let us know. For example, if you need a specific email, we could search for this using a particular word or phrase.

Briefly describe your request

Is there a date range for the personal data you're asking for?

It's helpful if you're as specific as possible about your request. For example, if you've been a customer for several years, but you only need data about your recent purchase history, you could ask for data about things you've bought only in the last few months.

Date from

Date to

Can you tell us anything else to help us with our search?

If there's anything else of relevance you can tell us to help us identify you or the data you're requesting, please include this here. For example, any aliases, date of birth, order number or a customer reference number.

Further information to help us find the data you need

Please send your request to us

Please clearly title and correspondence 'Subject Access Request' so that it gets our earliest attention.

By email to	dataprotection@essexwt.org.uk
By post to	Abbotts Hall Farm, Great Wigborough Colchester CQ57RZ
Or contact us by phone	01621862960