## **Jurassic Coast Trust**

## Draft Privacy and Security Policy V1 09/05/18



This policy applies to all the websites We operate, Our use of emails and text messages for marketing purposes, and any other methods We use for collecting information. It covers what We collect and why, what We do with the information, what We won't do with the information, and what rights you have.

#### Who are 'we'?

In this policy, whenever you see the words 'We', 'Us' or 'Our', it refers to the Jurassic Coast Trust. We are registered as a data controller for the purposes of the General Data Protection Regulation (GDPR).

The full legal information for each entity is:

Jurassic Coast Trust, a charity registered in England and Wales (Charity no. 1101134)

#### Your acceptance of this policy, and Our right to change it

By using Our websites, social media pages, entering a competition or providing your information you consent to Our collection and use of the information you provide in the way(s) 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. This policy was last changed on 12 May 2018.

## What is personal data?

Personal data is information that can be used to help identify an individual, such as name, address, phone number or email address.

# What information do We collect and why?

We will only ever collect the information We need – including data that will be useful to help improve Our services. We collect two kinds of information:

- Non-personal information such as IP addresses (the location of the computer on the internet),
  pages accessed and files downloaded. This helps Us to determine how many people use Our sites,
  how many people visit on a regular basis, and how popular Our pages are. This information doesn't
  tell Us anything about who you are or where you live. It simply allows Us to monitor and improve
  Our service.
- 2. Personal information such as name, postal address, phone number, email address, date of birth (where appropriate), information about your interests and hobbies etc., but only with your consent.

We collect this information in connection with specific activities, such as newsletter requests, registration or membership requests, product purchases, feedback, donations, competition entries etc. The information is either needed to fulfil your request or to enable Us to provide you with a more personalised service. You don't have to disclose any of this information to browse the sites. However, if you do choose to withhold requested information, We may not be able to provide you with certain services.

We also use cookies on Our websites. Please see Our <u>Cookies Policy</u> for further information.

#### What do We do with the information?

We will use the information you provide to:

- fulfil your requests such as applications for membership, donations, competition entries, participation in campaigns and provision of information
- process sales transactions, donations, or other payments and verify financial transactions
- identify visitors and contributors
- handle orders, deliver products and communicate with you about orders
- provide a personalised service to you when you visit Our websites this could include customising the content and/or layout of Our pages for individual users
- record any contact We have with you
- prevent or detect fraud or abuses of Our websites and enable third parties to carry out technical,
   logistical or other functions on Our behalf
- to carry out research on the demographics, interests and behaviour of Our users and supporters to help Us gain a better understanding of them and to enable Us to improve Our service. This research may be carried out internally by Our employees or We may ask another company to do this work for Us
- communicate with Our supporters and customers
- if you have agreed to it, provide you with information that We think may be of interest to you.

# Using your information for marketing

We provide our existing supporters, users and contacts with an opportunity to opt-out of receiving communication with us at every opportunity. As of May 2018, supporters and users will be required to 'opt in' to receiving communication from Us and we will only send marketing information to people who have specifically said that they agree to Us doing this, and We will only do so in the way(s) they have agreed to. Marketing information covers information from the goods and services sold, fundraising appeals and information about the other work we do.

If you want to receive this information but haven't opted in, you can do so by emailing <a href="mailto:optin@jurassiccoast.org">optin@jurassiccoast.org</a> or by calling team on 01308 807000 weekdays between 9am-5pm

If We contact you by email, every message We send will include a link to opt out of receiving future messages if you change your mind. If We contact you by other means and you want to change how – or if – you receive Our communications, please call our team on 01308 807000 weekdays between 9am-5pm.

## **Sharing your information**

We will only share your information if:

- We are legally required to do so, e.g. by a law enforcement agency legitimately exercising a power or if compelled by an order of the Court
- We believe it is necessary to protect or defend Our rights, property or the personal safety of Our people or visitors to Our premises or websites
- We are working with a carefully-selected partner that is carrying out work on Our behalf. These partners may include mailing houses, marketing agencies, IT specialists and research firms. The kind of work We may ask them to do includes processing, packaging, mailing and delivering purchases, answering questions about products or services, sending postal mail, emails and text messages, carrying out research or analysis and processing card payments. We only choose partners We can trust. We will only pass personal data to them if they have signed a contract that requires them to:
  - abide by the requirements of GDPR
  - treat your information as carefully as We would

- only use the information for the purposes it was supplied (and not for their own purposes or
- purposes of any other organisation)
- allow Us to carry out checks to ensure they are doing all these things.

### **Storing your information**

Information is stored by Us on computers located in the UK, and / or on cloud servers which may be situated inside or outside the European Economic Area. We may transfer the information to other offices and to other reputable third party organisations as explained above – they may be situated inside or outside the European Economic Area. We may also store information in paper files.

We place a great importance on the security of all personally identifiable information associated with Our supporters, customers and users. We have security measures in place to attempt to protect against the loss, misuse and alteration of personal data under Our control. For example, only authorised personnel are authorised to access user information and We use secure server software (SSL) to encrypt financial and personal information you input before it is sent to Us. While We cannot ensure or guarantee that loss, misuse or alteration of data will not occur while it is under Our control, We use Our best efforts to try to prevent this.

Unfortunately, the transmission of data across the internet is not completely secure and whilst We do Our best to try to protect the security of your information We cannot ensure or guarantee that loss, misuse or alteration of data will not occur whilst data is being transferred. Our cloud server storage is only with organisations that we trust that have demonstrated excellence in information security, and that are GDPR compliant.

Where you or We have provided a password enabling you to access parts of Our websites or use Our services, it is your responsibility to keep this password confidential. Please don't share your password with anyone.

We will keep your information only for as long as We need it to provide you with the goods, services or information you have required, to administer your relationship with Us, or the preferences of Our supporters, to comply with the law, or to ensure We do not communicate with people that have asked Us not to. When We no longer need information We will always dispose of it securely, using specialist companies if necessary to do this work for Us.

# What We don't do with your information

We never sell or share your information to other organisations to use for their own purposes.

## Your rights

The Data Protection Act and GDPR give you certain rights over your data and how We use it. These include:

- the right in certain circumstances to have inaccurate personal data rectified, blocked, erased or destroyed
- the right to prevent your data being used for direct marketing
- the right of access to a copy of the information We hold about you (known as a subject access request)
- the right to object to the processing of your data
- If you wish to exercise any of these rights please contact the Data Protection Officer in writing at Jurassic Coast Trust, Mountfield, Rax Lane, Bridport DT6 3JP. It is Our policy to charge the statutory maximum fee of £10 for a subject access request until 26<sup>th</sup> May 2018, after which a single isolated request will be free of charge.

For more information about your rights under the Data Protection Act go to the website of the Information Commissioner's Office at ico.org.uk.

The Jurassic Coast Trust is not a 'public authority' as defined under the Freedom of Information Act and We will not therefore respond to requests for information made under this Act; using the funds generously donated to Us by Our supporters for such activities is not in accordance with Our charitable purposes.

The Board of Trustees and Chief Executive are also responsible for ensuring that sufficient resources are provided to support the requirements of the policy.

## **Cookies**

We use cookies on Our websites, for full details see Our Cookies Policy.