

PRIVACY POLICY



Last updated **January 2020**

Signed by P Wilby

Related Policies:

Volunteer

Hayle Park Nature Reserve Privacy Policy

PRIVACY POLICY

1 Introduction

The activities of The Hayle Park Nature Reserve (HPNR) when processing personal data are governed by UK legislation and regulations such as the Data Protection Act, GDPR and the Privacy and Electronic Communications Regulations.

HPNR is not a public authority and our core activities do not require large scale, regular and systematic monitoring of individuals or large scale processing of special categories of data or data relating to criminal convictions and offences. Therefore, it is considered unnecessary to appoint a Data Protection Officer.

2 Purpose of This Procedure

To ensure that the trust abides by the eight principles are defined to ensure “personal data” of living individuals is handled properly. They are that data must be:

- fairly and lawfully processed
- processed for limited purposes
- adequate, relevant and not excessive
- accurate
- not kept for longer than is necessary
- processed in line with the individual’s rights
- secure
- not transferred to organisations or bodies in other countries without adequate protection

Failure to observe these principles puts the reputation of HPNR at risk. It may result in the Information Commissioner issuing an enforcement notice or criminal prosecution in respect of unlawful disclosure, unlawful obtaining or procuring of personal data, unlawful selling or offering to sell personal data etc.

3 Scope

This privacy policy explains how we use any personal information we collect when you contact us by phone, email, letter, attend any of our events or when you use our website:

<https://www.hayleparknaturereserve.org.uk/> or Facebook page:

<https://www.facebook.com/hayleparknaturereserve/>

Data protection is the responsibility of all volunteers as well as trustees of Hayle Park Nature Reserve.

4 Ensuring Access

All volunteers and trustees will have access to this document. Procedures of the trust will be available on <https://www.hayleparknaturereserve.org.uk>

5 Monitoring

Any concerns regarding breaches of this policy must be reported directly to the Chairman. Any trustee or volunteer found to have acted contrary to this policy and related guidelines may be subject to investigation which could result in suspension from activities involving access to personal data.

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What information is collected?

We collect information when people:

- Attend an event and sign-in
- Purchase tickets for an event
- Sign up for email updates
- Contact us via Facebook or e-mail
- Complete a form to become a 'Friend of HPNR'
- Complete a survey or provide feedback
- Bid to supply products or services to us
- Apply to become a volunteer
- Apply to become a trustee

This information may include:

- Name, role and organisation
- Contact details including email address

How the information is used

Hayle Park Nature Reserve may use information to:

- Complete ticket order for an event
- Send out updates via e-mail of upcoming events
- Send out newsletters
- Feedback regarding a comment, suggestion or complaint
- Arrange volunteer work-parties
- Invite quotations and process invoices

The table below details the data we collect, what we use it for and how long we keep it.

Data subject	Personal Data Collected	How we collect it	How we use it	Disclosure / Sharing	How long it is kept
Contractors	Contact details Qualifications	Provided by client in hard copy or email	Collated onto database To invite quotations and process invoices	You allow us to share your contact and qualification details with similar likeminded organisations who may have a legitimate interest in your services and with grant-making bodies who may require them	Seven years from completion of last contract
Volunteers	Contact	Provided in	Collated onto	You allow us	Three years

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	details Health/mobility issues Likes/Interests Availability Experience	hard copy, email or word of mouth by volunteer	database Matching with potential opportunities Contacting you with details	to share your contact details with those organising work parties or activities	after the last known activity
Trustees	Contact details Health/mobility issues Likes/Interests Availability Experience D.O.B Financial interests	Provided in hard copy or email by trustee	Collated onto database To ensure conformity to Trust Deed	You allow us to share your details with other trustees, with our banks and with official bodies such as the Charity Commission and Companies House as required by law	Details destroyed seven years after end of trusteeship

Security and Encryption

Hayle Park Nature Reserve uses suppliers that are committed to best practice in digital security. Donations are processed by PayPal and Mail Chimp is used to contact individuals via mail-shot. Volunteer applications are accepted via Do-it.org. However, the security of data transmission via the internet can never be 100% guaranteed, and data transmission is at your own risk.

Cookies

Third party cookies

Hayle Park Nature Reserve does not use cookies. However, some third party platforms such as Facebook may use cookies. We do not accept any responsibility for third party cookies.

How long do we keep personal information

The table above details the length of time personal details will be kept for different stakeholders within the organisation.

Marketing

Information will only be sent to people who have opted-in to our email information service. This can be opted out of at any time by selecting the 'unsubscribe' option at the bottom of the e-mail. Alternatively, you can contact Hayle Park Nature Reserve via haylepark@outlook.com and ask to be removed from the mailing list.

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Access to Information

Individuals have the right to request a copy of the information that we hold about them. This should be put in writing and sent either by email or post.

We will not charge for this service unless the request is 'manifestly unfounded or excessive or repetitive'.

Information Sharing

HPNR will not sell your information to any third party. We may share your information with third parties where we have legal duty to do so. We do not share personal information as a matter of course with other organisations. We will not contact individuals unless we have their express permission to do so.

Other websites

Our website contains links to other websites not run by HPNR. This privacy policy only applies to the HPNR website so when following a link to other websites their own privacy policy will apply.

Changes to our privacy policy

We keep our privacy policy under regular review and we will place any updates on our web page. This privacy policy was last updated in January 2020.

Rights

Data protection regulations give you clear rights over how data is used by us. More detail about individual rights can be found by visiting the Information Commissioner's Office website's section on [individual rights](#).

Individuals have the right to report concerns or complain about our handling of data to the Information Commissioner's Office. Details of how to do this can be found on its [website](#).

Policy Guidelines

1. The policy applies to:
Electronic records and media, e.g. databases, files, tapes, emails etc.
Manual records where structured, e.g. volunteer files, card indexes and paper lists of customer contacts etc.
Emails and voicemails where the focus is on an individual. Photographs and videos.
2. HPNR will obtain and maintain all necessary data protection notifications, keep its notifications current and under regular review, and ensure that all necessary amendments are promptly made.
3. The organisation will ensure that its practices relating to the holding, use and disclosure of personal data are always in accordance with its policy.
4. The trust chairman is responsible for the HPNR interaction with the Information Commissioner's Office and overseeing the HPNR data protection/GDPR governance process.

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5. Annual audits and regular self-assessments of HPNR activities will be carried out to check compliance to the policy and related policies. Reports on the status of compliance will be made to the Board of Trustees.
6. Where relevant, all volunteer role descriptions should contain a statement clearly defining their responsibilities to safeguard data.
7. All volunteers dealing directly with personal information will be required to take part in mandatory training relating to the GDPR.
8. Where HPNR volunteers access volunteer or other stakeholder “personal data”, this must only be processed in accordance with HPNR instructions and procedures.
9. Data may only be used for HPNR business and for the purpose for which it has been compiled.
10. Personal data should be protected in accordance with the HPNR confidentiality Policy. Computers storing or accessing HPNR personal data files will not be left unattended. Users accessing HPNR data over the web should log out of the secure site as soon as their query has been completed.
11. No personal data held by, or on behalf of, HPNR will be sold or inappropriately disclosed to a third party. Personal data may only be shared between third party organisations either where the individual has been informed and consented, or where the receiving organisation is acting in an agent capacity (as a “data processor”).
12. Clear guidance should be set on the retention period for personal data and the period it is available to process for a particular purpose.
13. Personal data should only be collected with explicit consent, or as part of initiating or entering into a contract.
14. Personal data should not be collected from children (under 18) without consent of a parent or guardian.
15. Prior to the collection of personal data or the deployment of a process, system, service or application using personal data, a review should be held to determine:
 - what personal data is to be collected, and its sensitivity
 - why HPNR requires this personal data – the “purpose”;
 - whether that “purpose” is in line with the HPNR data protection notification; charity status and ethics;
 - where a marketing purpose, compliance with the Direct Marketing Policy and Guidelines
 - the minimal personal information required to be collected;
 - the strategy for collecting, maintaining (for accuracy) and deleting the personal data;
 - the risks to the data subject or HPNR should the information be inaccurate when processed;
 - the retention period to keep the personal data;
 - how the information (in electronic form and hardcopy) will be protected;
 - where the information will be held (electronic and physical location);
 - who will have access;
 - the process by which the information will be disclosed in the event of a “Subject Access Request.”

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16. Any volunteer storing personal data on behalf of HPNR is responsible for ensuring adequate controls are in place for its protection.
17. Any volunteer storing personal data on behalf of the HPNR is responsible for ensuring that the processing of personal data complies with the stated, or implicit, purpose of use.
18. Any trustee or volunteer storing personal data on behalf of HPNR should ensure that the HPNR data protection notification(s) continue(s) to reflect their data protection policies, procedures and practices. Any new purposes should be communicated to the trust chairman.
19. Personal data should be held with an indication as to the date of its:
 - collection or modification
 - review or deletion.
20. The collection and processing of sensitive personal data (e.g. health problems) requires very strict controls. Sensitive personal data should only be collected with the explicit consent of the individual it pertains to.
21. Any volunteer collecting personal data on behalf of HPNR should submit the records to HPNR for safe keeping.
22. All external requests for disclosure ("Subject Access Requests", police enquiries etc.) should be forwarded to the HPNR chairman for action.