



## DATA PROTECTION AND PRIVACY POLICY

### INTRODUCTION

Action for Conservation ('AFC' or 'We') is a charitable organisation incorporated in England and Wales (no. 1157297).

In the course of our activity, we collect, use and are responsible for certain personal data about the people who engage with us and our work ('you'). When we do so, we act as a 'data controller' and we are subject to the UK General Data Protection Regulation (UK GDPR).

This Privacy Notice explains how we will collect, process and store your personal data as required under the existing data protection legislation. 'Personal data' or 'personal information' is information, or a combination of pieces of information, that could reasonably allow you to be identified. We are fully committed to protecting and respecting the privacy and security of your personal data.

### OUR CONTACT DETAILS

If you have any questions, comments or requests regarding this Privacy Notice, please contact us by:

- Post: Action for Conservation, South Wing, Somerset House, Strand, WC1R 1LA
- Email: [info@actionforconservation.org](mailto:info@actionforconservation.org)

### THE TYPE OF PERSONAL INFORMATION WE COLLECT, WHEN WE COLLECT IT AND HOW WE USE IT

We collect and process information about you when you:

- Visit our website or social media pages (via tools such as cookies and Google Analytics)

When you visit our website, Google Analytics records your IP address and details of your visit such as the date and time you visited and on-site activity. It also gathers other non-personal information (from which we cannot identify you) such as data related to your device and internet browser. Personal data is anonymised before it is made available to us for monitoring and statistical purposes.

We may also obtain your personal information through your use of social media platforms such as, but not limited to, Facebook, Instagram, Twitter, TikTok or LinkedIn, depending on your settings or the privacy policies of these social media services. To change your settings on these services, please refer to their privacy policies which will tell you how to do this.

In processing the information we obtain about how you use our website or social media channels, we use our legitimate interests to monitor and improve the

performance of our site and social media channels, to understand more about our users' interests, preferences and use of social media, and to inform our marketing strategy.

- Sign up for our mailing list

We will ask you for personal information such as your name and email address.

We will use this information to keep you up to date with news about our work and to inform you about opportunities we think you may be interested in, including for sending you marketing information about fundraising or events. Our legal basis for doing this is your consent.

- Make a donation to us

When you make a donation directly to us, we will ask you for personal information such as your first and last name, email and home address and telephone number as well as your gift aid status. We will also keep records of your donation history and correspondence with us.

We will use this information to administer your donation, including processing Gift Aid, to keep a record of your relationship with us and to review our database of supporters for the purposes of analysis and statistics. Our legal basis for processing this information is our legitimate interest to administer the charity in order to deliver on our charitable objectives.

- (Register your interest to) volunteer with us

We will ask you for your personal and contact details such as first and last name, email address, date of birth and phone number as well as the region in England or Wales where you live. We will also collect personal data created in the process of your involvement with us, such as details of how you've helped us by volunteering.

We will use your information for administrative purposes to support and manage your volunteering role. These purposes may include, but are not limited to records maintenance, identifying suitable volunteering opportunities and communicating with you about your volunteering role. Our legal basis for processing your data is pursuing our legitimate interest of administering the charity and its programmes.

We may also collect images, photographs or videos of you, with your consent. We may use this information to report back to our funders and supporters or for promotional purposes.. Our legal basis for processing this data is your explicit consent.

To process your volunteer application, we will also collect personal information about your education, qualifications and employment history (through a CV). We may also collect personal data about you from third parties, such as references supplied by former employers or information about criminal convictions. You will be asked to agree to specific terms and conditions at the time of making the application.

We will use this information to complete a Disclosure and Barring Service (DBS) check where we have a legal requirement or reason to do so and to ensure that AFC is a safe organisation for children and adheres to its Child Safeguarding and other

relevant policies. Our legal basis for processing this information is complying with our legal obligations and pursuing our legitimate interest of ensuring appropriate safeguarding for children is in place during our activities.

- Take part in one of our events or programmes, including WildED, Camps or Ambassadors programmes or our intergenerational action projects, such as the Penpont Project

The information we will ask you about depends on the specific programme you take part in.

If you take part in WildED, we will ask for your first name and last name initial and you will have the option of sharing your email with us if you'd like to stay updated with opportunities. We will also record the name of the school you attend.

If you apply for one of our residential camps, we will ask you for your name, date of birth, school name, and basic contact details including an email address. We will need to collect additional data if you are successful in getting a place on camp, please see the section below on sensitive personal data for details about this.

If you are joining our Ambassador Programme or a Land-based project and you haven't been on camp, we will ask for the same information set out above for a young person on our camps.

For all programmes, we will also collect personal data created in the course of your involvement with us such as details of your visits or events organised by us.

We will use this information for our administration and management of the event/programme and to send you any updates or information regarding the event/programme. Our legal basis for doing so is to fulfil the agreement with you for your attendance.

We may also collect photographs or videos of you, with your or a guardian's consent. Photographs and video content may be shared in the AFC newsletter, on our website, through other promotional materials, on social media and with our trusted partners, funders and volunteers. Our legal basis for processing this data is your explicit consent.

- Apply for a job with us

We will collect information about you which we will use to process your application. This includes but is not limited to your name, email address, contact number, relevant education and/or qualifications and employment history (via your CV). You will be asked to agree to specific terms and conditions at the time of making the application.

We will use this information to process your application and communicate with you in relation to the recruitment process. We undertake this processing because it is necessary to fully assess your suitability for the job you are applying for, and if successful, to take steps to enter into a contract with you (this is our legal basis for processing).

- Are made an offer of employment with us

We will ask you for personal information including formal identification documentation and/or visa documentation. We may also collect personal data about you from third parties, such as references supplied by former employers or information about criminal convictions.

We will use this information to comply with our legal obligations as an employer (this is our legal basis for processing), including:

- Confirming your identity and eligibility to work in the UK as required by immigration laws.
- Completing a Disclosure and Barring Service (DBS) check where we have a legal right or reason for doing so.

- Contact us or become involved with us in any other way than as stated above.

In limited and specific circumstances, we might collect special categories of personal information (sensitive personal data). These circumstances include:

- If you choose to complete an optional Equality and Diversity monitoring form as part of one of our programmes or as part of a volunteer or a job application.

As part of our commitment to being a diverse and inclusive organisation and to ensure that we treat people fairly, we may collect information about your age, gender, sexual orientation, race or ethnicity, religion or belief, socio-economic background or data concerning health and disabilities. This information will only be used for monitoring the diversity purposes. The data collected from young people will always be anonymised and data collected from adults remains strictly confidential. Our legal basis for processing this information is your explicit consent. You have the right to withdraw this consent at any time.

- If you apply for a job or to volunteer with us.

For certain roles, we have a legal right/ reason to undertake Disclosure and Barring Service (DBS) checks. In such cases, we will collect information about your identity and any criminal convictions. Our legal basis for processing this information is meeting our legal requirements.

- If you volunteer with us or take part in some of our programmes.

We may collect details of your emergency contacts/next of kin, your medical and social history and current medical and social needs. Where this concerns young people under the age of 18, we will always ask a parent or a guardian for this information. Your personal data will be retained for legal reasons and for safeguarding purposes, so that in the unlikely event that there is an incident or emergency, we are able to manage the situation appropriately.

- If an incident or an accident occurs.

If an incident or an accident occurs during one of our events or activities or involving one of our staff or volunteers we will keep a record of this, which may include

personal data and sensitive personal data. Our legal basis for processing this information is meeting our legal obligations.

## HOW WE COLLECT INFORMATION ABOUT YOU AND WHY WE HAVE IT

Most of the personal information we process is provided to us directly by you for the purposes outlined above.

We also receive personal information indirectly, in the following cases:

- If you donate to us via Enthuse or JustGiving

If you donate to us via Enthuse or JustGiving, we will receive personal data about you via the respective donations platform. This includes your first and last name, email address, address and telephone number. You will also need to provide your payment details, so that your donation can be processed and paid to us. Please note that your financial information is not passed on to us.

Please read Enthuse's and/or JustGiving's Privacy Notices to understand how they collect and use personal data about you.

- From a parent or a guardian where the information relates to young people under the age of 18
- From third-party referees where you have applied for a job or to volunteer with us
- Through automated technologies and interactions

If you receive an email, open it, don't open it, select a link, browse our website, we collect this information so we can see which stories are popular and which aren't, so we can improve our communications.

When we are seeing people's online activity in this way, we are using cookies. If you don't want cookies, you can set your browser to notify you when you receive one, then choose to decline it. Please note that if you disable or refuse cookies then some parts of our website may become inaccessible or not function properly.

The law requires us to only process data where we have a valid legal basis for doing so. Under the UK General Data Protection Regulation (UK GDPR), the lawful bases we rely on for processing your information are:

- Where we have your consent. You are able to withdraw your consent at any time by contacting us via the contact details given at the top of this Privacy Notice.
- Where we have a legal obligation.
- Where we have a contractual obligation.
- Where it is necessary for our legitimate interests and your interests and fundamental rights do not override those interests. Our legitimate interests include administering the charity, reporting and being accountable to our funders and donors, understanding our supporters and monitoring and improving our services.
- Where we need to perform a task in the public interest.

## HOW WE MANAGE YOUR DATA AND WHOM WE MIGHT SHARE IT WITH

We may share personal data with subcontractors or suppliers who provide us with services. However, these activities will be carried out under a contract which imposes strict requirements on our supplier to keep your information confidential and secure.

Occasionally, where we partner with other organisations, we may also share information with them but only when this is necessary and we will make sure to notify you first.

- THIRD PARTY PROCESSORS

We do not undertake all of our processing activities ourselves. We use third party platforms and processors to deliver newsletters, collect applications or event registrations, send out surveys and collect feedback. In using these third parties, we are pursuing our legitimate interest to use third party technology to achieve greater efficiency within our organisation. We take steps to ensure these third parties maintain appropriate technical and organisational measures to keep your personal information secure.

We use Mailchimp to manage our mailing list and deliver our newsletters. Its privacy policy can be found [here](#), along with other useful information about Data Privacy & Protection.

We use Salesforce to manage our contact database(s) for our service users, volunteers, donors and employees. Its Privacy Policy can be found [here](#).

We use SurveyMonkey to administer surveys and job applications. Its Privacy Notice is available [here](#).

We use Enthuse and JustGiving to collect donations from existing and new donors. See Enthuse's Privacy Policy [here](#) and JustGiving's Privacy Policy [here](#).

We use Verifile for identity, right to work and criminal record checks that we are required by law to complete. Its Privacy Notice is available [here](#).

- INTERNATIONAL TRANSFERS

The personal data we collect is managed by our UK-based staff team.

However, when using third party platforms we may need to transfer your personal data to suppliers based in the US or other countries outside of the UK and the European Economic Area (EEA) to allow them to perform services on our behalf. In doing so, your data may be stored or otherwise processed outside of the EEA. In these instances, we ensure a similar degree of protection is afforded, for instance by ensuring a contract with the third party supplier is in place which is approved by the European Commission and gives personal data the same protection it has in the EEA (referred to as Standard Contractual Clauses or SCCs).

For the purposes of hosting and maintenance, the data we hold may be located on servers outside the UK. However, these third parties do not have access to your personal data. <https://privacy.google.com/intl/en-GB/your-security.html>

## KEEPING YOUR DATA SAFE

We employ a variety of physical and technical measures and follow procedures designed to keep your data safe and to prevent unauthorised access to, or use or disclosure of your personal information.

Staff are trained on data retention and protection and Board members are briefed on this policy.

Only staff, volunteers, and board members who need to access personal data for their duties are given access to it.

All data and personal information are kept confidentially and securely as follows:

- Data in hard copy form – in locked cabinets.
- Data in electronic form – in password protected areas/files and in encrypted form on secure servers.

Data is stored and backed up on the AFC Google Drive (cloud facility). Computers used by staff to access and process data are encrypted and password protected.

Files and online databases containing personal information are password-protected. Records of passwords are kept in a secure place and they are updated every six months.

Email filters are used to reduce the risk of fraudulent emails and all financial transactions are subject to AFC's Financial Procedures Policy.

## RETENTION OF INFORMATION

We will only keep your personal information for as long as is necessary for the purpose for which it is collected, which may include the purpose of satisfying any legal, accounting or reporting requirements. Even where information is not covered by the Data Protection Act 1998 (DPA 1998), the information we hold will be adequate, relevant, not excessive, accurate, up-to-date, and not kept for longer than is necessary. Your personal data will be securely deleted at the end of this retention period.

Information/document type	Retention period
Trust deeds, governing documents	Indefinitely
Minutes of board meetings	Indefinitely
Health and safety assessments	Indefinitely
Insurance certificates	40 years
Finance and salaries records	7 years
Team meetings	5 years
Funding paperwork	3 years after end of funding programme or longer if the contract requires

Minutes and papers of meetings with external partners	1 year
Personnel records	7 years
Service recipients	7 years
Contracts	6 years
Disciplinary records	2 years
Employee time sheets	2 years
Job application forms for unsuccessful candidates, interview notes, disclosures	1 year
Accident book	3 years after last entry

Any other information retained by us is in accordance with the DPA 1998 and manual and computer records not listed above are kept for no more than one year.

Information listed above, which contains personal information, is kept securely and disposed of by shredding or some other way, which does not breach confidentiality. We carry out an annual audit of document retention, to ensure the above policy is actively adhered to.

## PERSONAL DATA AND YOUR RIGHTS

You have the following rights in respect of your personal data:

- Right of access - You have the right to ask us for copies of your personal information.
- Right to rectification - You have the right to ask us to rectify personal information you think is inaccurate. You also have the right to ask us to complete information you think is incomplete.
- Right to erasure - You have the right to ask us to erase your personal information in certain circumstances.
- Right to restriction of processing - You have the right to ask us to restrict the processing of your personal information in certain circumstances.
- Right to object to processing - You have the right to object to the processing of your personal information in certain circumstances.
- Right to data portability - You have the right to ask that we transfer the personal information you gave us to another organisation, or to you, in certain circumstances.

You are not required to pay any charge for exercising your rights. If you make a request, we have one month to respond to you. Please contact us using the details provided at the top of this Privacy Notice if you wish to make a request.

If you have any concerns about or wish to raise a complaint on how we have handled your personal data, you can contact our Data Controller who will investigate the matter. Our Data Controller is Hendrikus van Hensbergen and you can contact him on: [hendrikus@actionforconservation.org](mailto:hendrikus@actionforconservation.org)




If you are not satisfied with our response or believe we are not processing your personal data in accordance with the law, you can complain to the Information Commissioner's Office (ICO), with whom we are registered. The ICO's contact details are provided below.

Address: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF

Helpline number: 0303 123 1113

Website: <https://www.ico.org.uk>

Policy	Data Protection & Privacy Policy
Review dates	16/3/2018; 15/03/2019; 11/02/2020; 14/12/2020; 19/01/2023
Chief Executive Officer & Data Controller:	 Hendrikus van Hensbergen