



Privacy Notice

How the South West Coast Path Association treats your personal information and how to check what details they have for you.

How we use your personal information

Our privacy notice tells you how we will handle personal data we may collect or receive about you. The South West Coast Path Association is registered with the Information Commissioner's Office as a data controller and our registration number is ZA243972.

Any references to the South West Coast Path Association, or to 'we' or 'us' refer to: South West Coast Path Association. We are a registered charity in England and Wales, and our registered charity number is 1163422

We use three key definitions to describe people mentioned 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 data.

'Data controller': this is us, the South West Coast Path Association. With your permission, we determine why and how your personal data is used (as outlined in this policy).

'Data processor': this is a person, or organisation, who processes your data on our behalf, with your permission. For example, this might be a mailing house who sends your Trailblazing 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).

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 or share with other organisations.

Should you wish to find out more about the information we hold about you, or about our privacy policy, please contact us:

Data Controller, South West Coast Path Association
Unit 2, Bowker House, Lee Mill, Ivybridge, PL21 9EF
Telephone: 01752 896237.
Email: hello@southwestcoastpath.org.uk

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

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1. Information we may collect from you and/or receive about you

The need to collect personal data will arise in regard to all of our activities as a registered charity. The type of personal data we may collect from you varies according to the nature of the engagement or activity we may be involved in.

2. 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 membership

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

- Sending you a membership pack
- Member communications including your Trailblazing magazines, monthly e-newsletters, AGM and renewal notices
- Getting in touch should there ever be any issues fulfilling your membership

b) To administer your donations

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

- Sending you a thank you letter
- Getting in touch should there ever be any issues processing your donation

c) To send you items purchased from our online shop

We collect your personal data to send you items you have purchased from our online shop

The ICO define the lawful basis for processing your data for items addressed in a), b) and c) above for these purposes as 'contractual'.

d) To send you information about our work

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 fundraising appeals, campaigning and volunteering opportunities and other activities.

This information is in addition to that outlined in sections a) and b) and c) and is defined as 'direct marketing' by the ICO.

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.

As defined 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.

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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, telephone or post.

We respect your right to update the way we get in touch with you about our work at any time.

e) To enable you to volunteer with us

If you are a South West Coast Path Association 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

3. 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).

b) Getting to know you better

We also collect information about you that helps us to get to know you better. This may include:

- records of donations you've made
- 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

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 data from you directly.

Other ways in which we collect personal data to get to know you better includes 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

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. 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.

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

- references
- notification of criminal records checks
- details of emergency contacts
- medical conditions

We may also collect sensitive personal data in case of an accident on our premises. 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.

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 electronic South West Coast Path Association forms that request financial data will use the Secure Sockets Layer (SSL) protocol to encrypt the data 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 provider (PayPal). Other payment methods (e.g. WorldPay) are handled in a similar manner.

The South West Coast Path Association 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.

c) Data retention policy

We will only use and store information for as long as it is required for the purposes it was collected for (for example legal, financial and human resource information is normally kept for 6 years, whereas information on programmes will normally be kept for 3 years and information such as IT backups, for 3 months) . We continually review what information we hold and delete what is no longer required.

6. Your rights

Under the Data Protection Act you have rights as an individual which you can exercise in relation to the information we hold about you. Your rights include: access to your data; restriction, correction and deletion of data; the right to object to the use of your data; and your right to raise a concern. You can find out more about these rights at the information Commissioner's Officer web site:

<https://ico.org.uk/your-data-matters/>

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7. Making a complaint

The South West Coast Path Association wants 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.

8. 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:

South West Coast Path Association

Telephone: 01752 896237

Email: hello@southwestcoastpath.org.uk

Unit 2, Bowker House, Lee Mill, Ivybridge, PL21 9EF

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We update this policy periodically.

Last updated: May 2018