

# **Heal Rewilding - Privacy Policy**

Version 2.0 March 2021

#### Introduction

At Heal we take your privacy very seriously. We recommend that you read this policy carefully because it contains important information about your privacy rights and how we gather, store, use and share your personal information – that includes personal information we already hold about you now and the further information we might collect about you, either from you directly or from a third party. How we use your personal information will depend on the services we provide to you. It also has information on how to contact us and the Information Commissioner in the event that you have a complaint.

#### Who we are

Heal Rewilding CIO ('Heal') ('we' or 'us') collect, use and are responsible for certain personal information about you. When we do so, we are regulated under the General Data Protection Regulations and we are responsible as 'controller' of that personal information for the purposes of those laws.

#### Why we need to collect personal information

As a fundraising charity we rely on the generosity of our supporters to raise vital funds for the benefit of the Heal. We endeavour to undertake all our fundraising activities in an ethical, transparent way to maintain the confidence of our supporters which we rely on and for the benefit of Heal. If you have any questions about how we use your personal information please contact us by email at <u>heal@healrewilding.org.uk</u> or by post at the address at the end of this document.

This information in this privacy notice provides current details about how we use your personal information. If there are changes to data protection law or if we make significant changes affecting how we use your personal information, we will provide an update through a notice on our website and in our monthly newsletter.

#### Your privacy rights

You have the right to object to how we use your personal information. You also have the right to see what personal information we hold about you. In addition, you can ask us to correct inaccuracies, delete or restrict personal information or ask for some or all of your personal information to be provided to you or someone else.

If you are unhappy about how we have handled your data, you can make a complaint to the Information Commissioner's Office (ICO), the UK's data protection supervisory authority.

## Right to object

You have a right to object to our processing of your personal information. We have one calendar month to respond to your request.

## Access to your personal information

At any time, you can ask us for a copy of your personal information that we hold, together with a description of what we use, why we use it, who we share it with and how long we keep it for. You can make a request for access free of charge by contacting us as noted above. We have one month in which to provide the information or contact you to explain why we need to extend the time to respond or why we are unable to comply.

## Right to withdraw consent

You can withdraw any consent you have given us to use your personal information at any time, and update any preferences you may have made by contacting us as noted above. This does not affect any processing we have done prior to your request.

# Rectification

You have the right to ask us to change or amend any inaccurate or incomplete personal information held about you. We must act on your request within one month.

# Erasure (right to be forgotten)

You have the right to have the information we hold about you deleted in three instances: where it is no longer necessary for us to have it; where you have withdrawn consent; or where we cannot demonstrate a legal basis for keeping it. We have one month in which to respond to your request.

# Portability

You have the right to ask us to provide you, or a third party, with some or all of the personal information we have about you. If we hold the information electronically, we will be able to provide it to you in a structured, commonly used electronic form, so it can be easily transferred. The ability to do this is dependent on the format it is held in such as in a spreadsheet or a PDF file.

## Restriction

You can ask us to restrict the personal information we use about you where you have asked for it to be erased or where you have objected to our use of it. The amount we retain is only enough information about you to ensure that the restriction is respected. We have one calendar month in which to respond to your request.

If you would like to exercise any of these rights please:

- email us at heal@healrewilding.org.uk or call us on 020 3355 2149
- let us have enough information to identify you
- let us have proof of your identity (a copy of your driving license, passport or a recent credit card/utility bill)
- let us know the information to which your request relates

For further information on each of those rights, including the circumstances in which they apply, see the Guidance from the UK Information Commissioner's Office (ICO) on individual's rights under the General Data Protection Regulations: <u>http://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/</u>.

From time to time we may also have other methods to unsubscribe (opt-out) from any direct marketing including for example, unsubscribe buttons or web links. If such are offered, please note that there may be some period after selecting to unsubscribe in which marketing may still be received while your request is being processed.

# What kinds of personal information we use

Heal collects, stores and processes personal information about prospective, current and former donors and supporters of the charity. We may gather this personal information directly from you when you:

- sign up for news or information
- ask about our activities or resources
- complete surveys or respond to consultations
- use our services or attend activities virtually or in person
- volunteer or fundraise for us
- pledge or donate or sign up for an event
- telephone, write, contact us online or text us or otherwise provide us with your personal information.

Alternatively, we may gather this information indirectly from our website or social media platforms, through third parties such as MailChimp when you sign up to *Heal Highs* or Enthuse when you make a donation online, use fundraising platforms like Justgiving, or from partner organisations that support delivery of the services you may receive.

Personal information can include information such as your name, communication preferences, email address, postal address, telephone number, mobile number, date of birth/age or bank account details so we can process donations or payments, or information as to whether you are a taxpayer to help us to claim gift aid.

If you give us information about another person, you confirm that the other person has appointed you to act on their behalf and agreed that you:

- shall consent on their behalf to the processing of their personal data
- shall receive any data protection notices on their behalf
- shall consent on their behalf to any transfer of their personal data abroad

## Our legal basis for using your information

We only use your personal information where that is permitted by the laws that protect your privacy rights. We will use personal information where:

- a) we have your consent (where consent is needed)
- b) we need to use the information to comply with our legal obligations
- c) we need to use the information to enable us to enter into a contract with you and in the fulfilment of that contract, or where we have identified legitimate interest as the lawful basis for processing data

Where we have your consent, you have the right to withdraw it. We will let you know how to do that at the time we get your consent.

We also rely on our legitimate interests to process data as connecting people to our cause is instrumental in meeting our charitable objectives.

### Children and the validity of consent

Where we obtain consent from any user we will take reasonable steps to ascertain whether the user is over 13 years of age and whether the child is sufficiently informed to give valid consent. If the user is not, parental consent will be required to provide consent for the processing of any personal information.

### The purpose of processing your data

To thrive as a charity, we rely on the support, trust and generosity of the public, philanthropists, the business community, Trusts and Foundations. As part of our work to seek your support, we will keep you up to date with our fundraising and marketing news and activities. We may collect data in order to process your donation and to provide you with information on our products and services. We may use a range of channels such as newsletters, direct mail appeals, thank you letters, invitations to events and fundraising receptions, meetings, phone conversations, our website and social media platforms.

We process your data for the following reasons:

- Fundraising activities and events
- Seeking donations or support in kind
- Marketing and communications about the activities of Heal
- Research and analysis to help inform our decisions and how we communicate with you

We may undertake research and analysis to help inform our decisions as a fundraising charity. This may include segmentation of our database to inform direct mail appeals, analysing how many newsletters are opened and read to ensure what we include is relevant and of interest; and analysing our supporter base to identify, communicate and engage with philanthropists and people who might choose to give significant donations.

#### **Researching potential supporters**

We may carry out in-house research, or from time to time engage specialist third-party research agencies or fundraising and research consultancies, to help us to understand more

about an individual and their ability to support the Charity, if an individual could be a potential major supporter, and what aspects of our work might be of particular interest to them. This helps us to identify and engage with people who may wish to have a closer and more informed relationship with the charity and join our major donor funding programme by making a significant gift. To do this, we may use publicly available information from third party sources such as Google, Companies House, trade press and published biographies. The type of information we collect can include:

- career overview
- gift capacity
- areas of interest
- history of giving to us and others
- how the individual is connected with us and others
- public information on any philanthropic activities

In order to identify people who might benefit from this more personal approach we may screen our database or use trusted third-party organisations to do so and to automate some of this work. During this wealth screening work, information gathered from public sources may be used alongside the information you provide to undertake analysis of who might support Heal and to understand the preferences of our supporters about events, communication and services. We may also use profiling to produce short biographies of people who are due to meet with our leadership or attend one of our events. Please refer to our Wealth Screening policy for more information.

We are careful to ensure that the information we process is not excessive or intrusive. Where we use a third party, we will ensure that a data contract exists that specifies that the third party will only use the data for the purpose they are engaged for, and that the data will be held securely and won't be sold on or reused for another purpose.

We rely on our legitimate interests to process this data as connecting people to our cause is instrumental in meeting our charitable objectives.

Under data protection legislation, you have the right to object your data being processed in this way. You can do this by contacting <u>heal@healrewilding.org.uk</u>.

We are also legally required to carry out checks on individuals who donate large donations, to comply with our duties in respect of anti-money laundering legislation and the prevention of fraud.

## Sharing your personal information with or getting your personal information from others.

We must tell you if we want to pass your information on to anyone else. In general, any information you provide will only be used within Heal, including by certain volunteers and contracted agencies who help us with research and marketing, and by our service providers/data handlers, including Enthuse (for donations processing) and MailChimp (to send you *Heal Highs*). It will never be supplied to anyone outside Heal or our service

providers without first obtaining your consent unless we are obliged or permitted by law to disclose it.

# Retention of your personal information

The length of time we keep your personal information depends on the services we deliver to you and certain legal obligations. We also consider the purpose, value and corporate significance when deciding how long to retain information. We will never retain your personal information for any longer than is necessary for the purposes we need to use it for.

We will not use your personal information for marketing purposes once you no longer have a relationship with us or have exercised any of your rights in relation to your information. If you volunteer with us, we will only keep your information for as long as you are volunteering with us, unless we have a legal basis that stipulates it should be retained for longer.

We may hold information in relation to grant funding for up to 15 years after the termination of the funding. This is normally stipulated by the funding provider.

In some circumstances we will hold personal information for longer where necessary for active or potential legal proceedings, to resolve or defend claims, and for the purpose of making remediation payments.

# Security of and access to your personal data

We take the security of your personal information extremely seriously. We've implemented appropriate physical, technical and organisational measures to protect the personal information we have under our control, both on and offline, from improper access, use, alteration, destruction and loss. Your information is only accessible by appropriately trained staff and volunteers. Otherwise, as set out in this Privacy Policy, we will only ever share your data with your informed consent.

We also have procedures in place to deal with any suspected data security breach. We will notify you and any applicable regulator of a suspected data security breach where we are legally required to do so.

Indeed, while we will use all reasonable efforts to secure your personal data, in using our website you acknowledge that the use of the internet is not entirely secure and for this reason we cannot guarantee the security or integrity of any personal data that are transferred from you or to you via the internet. If you have any particular concerns about your information, please contact us using the details below.

## Transfers of your information out of the EEA

We use Dropbox (business account) and Microsoft service to hold information. The data of Dropbox and Dropbox users is stored at server centres of third-party providers in the US. These providers are responsible for server security, but Dropbox tests their security measures once a year. Microsoft uses standard terms provided by the European Commission that can be used to transfer data outside the European Economic Area in a compliant manner.

### Keeping you up to date

We will communicate with you in by using the contact details you have provided to us – for example by email, text message, social media, and notifications on our website. Our current policy is to be a digital-only organisation so we do not use physical post; however, we may ask for your postcode to better understand our supporters. Our donations service provider, Enthuse, asks for address details in order to process Gift Aid.

Where you have given us consent to receive marketing, you can withdraw consent, and update your marketing preferences by contacting us by email at <u>heal@healrewilding.org.uk</u> or by post at the address at the end of this document.

### Contact

Please do contact us if you have any queries about how we use your data using <u>heal@healrewilding.org.uk</u> or by writing to:

Heal Rewilding CIO c/o 55 Norfolk Road Maidenhead SL6 AU

#### Make a complaint

If you have any concerns about how we've used your personal information you can contact us by email at <u>heal@healrewilding.org.uk</u> or at this address:

You can also contact the UK's data protection supervisory authority, the Information Commissioner's Office here: <u>https://ico.org.uk/concerns/</u> or telephone: 0303 123 1113.

## Changes to the privacy policy

This privacy policy was published on 08/03/2021 and last updated on 08/03/2021.