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## Cumbria Wildlife Trust Privacy Policy

### 1. Who are we?

Cumbria Wildlife Trust is the only voluntary organisation devoted solely to the conservation of the wildlife and wild places of Cumbria. The Trust stands up for wildlife, creates wildlife havens and seeks to raise environmental awareness.

Formed in 1962 and supported by over 15,000 members and supporters, the Trust cares for over 40 nature reserves, campaigns for the protection of endangered habitats and species such as limestone pavements and red squirrels, and works with adults and children to discover the importance of the natural world.

Cumbria Wildlife Trust is part of a partnership of 47 local Wildlife Trusts across the UK. With 800,000 members and 2,200 nature reserves, The Wildlife Trusts are the largest UK voluntary organisation dedicated to conserving the full range of the UK's habitats and species.

### 2. Our commitment to your privacy

We are committed to keeping the personal details of our members and supporters safe. This policy explains how and why we use your personal data, to ensure that you remain informed and in control of your information.

Any references to Cumbria Wildlife Trust, the Trust, or to 'we' or 'us' refer to:

- Cumbria Wildlife Trust. **We are a registered charity in England and Wales, and our registered charity number is 218711.**

We use three key definitions to describe people mentioned in this policy. These are definitions enshrined in GDPR and used by the Information Commissioner's Office (ICO), the UK's independent body set up to uphold information rights ([www.ico.org.uk](http://www.ico.org.uk)):

- **'Data subject'**: this is you, one of our loyal members and supporters. As the data subject, we respect your right to control your data.
- **'Data controller'**: this is us, Cumbria Wildlife Trust. We determine why and how your personal data is used (as outlined in this policy).
- **'Data processor'**: Cumbria Wildlife Trust is a data processor as well as any other organisation, who processes your data on our behalf, with your permission. For example, this might be a mailing house who sends your membership 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.

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

Director of Finance and resources  
Telephone: 01539 816300  
Email: [mail@cumbriawildlifetrust.org.uk](mailto:mail@cumbriawildlifetrust.org.uk)  
Cumbria Wildlife Trust, Plumgarths, Crook Road,  
Kendal, Cumbria LA8 8LX

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

### **3. 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 Cumbria Wildlife Trust membership and donations**

We collect your personal data (see section 4 for the kind of data we collect) to administer your membership and donations, which may involve:

- Sending you your membership welcome pack when you first join us
- Sending you a thank you letter or email
- Processing your Direct Debit subscription payments, if you have set this donation process up with us
- Sending you your membership renewal letter
- Getting in touch should there ever be any issues processing your subscription payment or donation

The lawful basis for processing your data for these purposes may be 'contractual' or 'legitimate interest'.

#### **b) To send you items purchased from our online shop, including event bookings**

We collect your personal data to send you:

- items you have purchased from our online shop
- information about events you have booked onto

The lawful basis for processing your data for these purposes is 'contractual'.

#### **c) To send you information about our work and ask for your opinion**

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 your membership welcome pack, membership magazine, fundraising appeals, events, campaigning opportunities, membership, services, products, newsletter requests, feedback, competitions and other activities, as well as information about other carefully selected organisations that we work in partnership with (such as Vine House Farm's bird seed catalogue). From time to time, we may also use your personal data to ask for your opinion about our work.

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

**i) Joint and family membership**

If you are a 'joint' or a 'family' member of Cumbria Wildlife Trust, we will address communications to all those listed on your membership. If you wish to update this at any point, please let us know. See section 4d in relation to children under 13 years of age.

**ii) Gift membership**

If Wildlife Trust membership is purchased as a gift, we will send the membership pack to the gifter to pass on to the recipient. The recipient will then need to activate the membership and provide us with their details.

**iii) When your membership has ended**

Unless we hear from you directly, we will continue to send you information about our work for up to 12 months after your membership has ended. This is just in case your support was cancelled accidentally, by for example changing your bank account details, and you wish to update your details with us. Or you may wish to consider supporting us in a different way.

**iv) Direct marketing**

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. Likewise, keeping a record of your wildlife interests that you may tell us about in one of our Membership Surveys, helps us to send you relevant project updates.

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.

We use legitimate interest to send you the information listed above by **post** or **telephone** (if you *are not* registered with the [Telephone Preference Service](#), and you have given us your telephone number).

**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**, **text message** (SMS) or **telephone** (if you *are* registered with the [Telephone Preference Service](#))

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

#### **d) To enable you to volunteer with us**

If you are a Cumbria Wildlife Trust 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, by sending you our volunteer newsletter
- dedicated volunteer thank-you events

The lawful basis for processing your data for these purposes may be 'contractual' (where administering your volunteer record) and 'legitimate interest' (when sending you information about our work).

### **4. 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:

- information about your wildlife interests, which you tell us through our Membership Surveys
- 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. Data collected, processed, handled, shared and transferred both ways between The Royal Society of Wildlife Trusts (RSWT) and our Wildlife Trust is bound by a written Data Sharing Agreement to protect your data in line with current legislation.

We may also collect demographic and consumption data generated through geodemographic tools (such as CACI Acorn), as well as information related to your wealth. This may include information from public registers and other publicly available sources such as Companies House, newspapers and magazines. If you do not wish your data to be collected in any of these ways, or have questions about them, please contact us:

Director of Finance and resources

Telephone: 01539 816300

Email: [mail@cumbriawildlifetrust.org.uk](mailto:mail@cumbriawildlifetrust.org.uk)

Cumbria Wildlife Trust, Plumgarths, Crook Road,  
Kendal, Cumbria LA8 8LX

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

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

**i) 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

We do NOT use cookies to:

- Collect any personally identifiable information (without your express permission)
- Collect any sensitive information (without your express permission)
- Pass personally identifiable data to third parties
- Pay sales commissions

For more information on our Cookies Policy, please see [pages 9-12](#).

**c) Sensitive personal data**

We do not normally collect or store sensitive personal data, also known as special category data, (such as information relating to health, beliefs or political affiliation) about supporters and members. 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. In most cases we will only collect such information with your specific consent and permission. In these situations, we collect the data from you directly. There are limited cases where permission is not required for processing special category data.

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

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

We may also collect sensitive personal data if you have an accident on our premises or one of our reserves. 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, if we receive any information through any data collection channel that indicates an individual is under 13 years old age, we will not store or process that individual's personal details, unless we have the express permission from your parent or guardian to do so.

If we have the permission of your parent or guardian, and you are a Wildlife Watch member, we will capture your date of birth at the point of joining. This is so that we can send you information that we feel is suitable to your age.

## **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).

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 Cumbria Wildlife Trust 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 (Stripe; PayPal). Other payment methods (e.g. ApplePay) are handled in a similar manner.

Cumbria Wildlife Trust complies with the payment card industry data security standard (PCI-DSS) published by the PCI Security Standards Council, and will never store card details. Our PDQ machine is rented from: Yorkshire Payments Thornhill Brigg Mills, Thornhill Beck Lane, Brighouse, HD6 4AH.

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 your own risk.

### **c) CCTV**

We use Closed Circuit Television to share wildlife through our website. We have a Seal Cam at South Walney nature reserve, Osprey Cam at Foulshaw Moss nature reserve and Wild Bird Feeder Cam at Cumbria Wildlife Trust's offices in Kendal. These enable people to see wildlife up close without disturbing them.

We also have some CCTV cameras on nature reserves to help provide security and to protect both you and Cumbria Wildlife Trust. CCTV will only be viewed when necessary (e.g. to detect or prevent crime) and footage is only stored temporarily. Unless it is flagged for review CCTV will be recorded over.

Cumbria Wildlife Trust complies with the Information Commissioner's Office CCTV Code of Practice, and we put up notices, so you know when CCTV is in use.

### **d) Data retention policy**

We will only use and store information for as long as it required for the purposes it was collected for. We continually review what information we hold, and delete what is no longer required.

## **6. Your rights**

We respect your right to control your data. Your rights include:

**a) The right to be informed**

This privacy notice outlines how we capture, store and use your data. If you have any questions about any elements of this policy, please contact us.

**b) The right of access**

If you wish to obtain a record of the personal data we hold about you, through a [Subject Access Request](#), we will respond within one month.

**c) The right to rectification**

If we have captured information about you that is inaccurate or incomplete, we will update it.

**d) The right to erase**

You can ask us to remove or randomise your personal details from our records.

**e) The right to restrict processing**

You can ask us to stop using your personal data.

**f) The right to data portability**

You can ask to obtain your personal data from us for your own purposes.

**g) The right to object**

You can ask to be excluded from marketing activity.

**h) Rights in relation to automated decision making and profiling**

We respect your right not to be subject to a decision that is based on automated processing.

For more information on your individual rights, please see the [Information Commissioner's Office](#).

**7. Making a complaint** (either generally or in relation to data protection)

Cumbria Wildlife Trust want 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.

For further information on how to make a complaint, please see our [complaints policy](#).

### **Information Commissioner's Office**

For further assistance with complaints regarding your data, please contact the Information Commissioner's Office, whose remit covers the UK.

Information Commissioner's Office  
Wycliffe House  
Water Lane  
Wilmslow  
SK9 5AF

Telephone: 0303 123 1113  
Email: [casework@ico.org.uk](mailto:casework@ico.org.uk)

## **8. Leaving our website**

We are not responsible for the privacy practices or the content of any other websites linked to our website. If you have followed a link from this website to another website you may be supplying information to a third party.

## **9. Sharing data**

We will never sell your personal data. When sharing your data with us, if you have opted-in to receive further contact, we may get in touch with information about our partners, or third party products and services, but these communications will always come from The Wildlife Trusts. In some circumstances where we are using subcontractors or suppliers we may share your personal data so that they can carry out their contractual services. For example, if you order something from a Wildlife Trust shop that uses a third party delivery company, your name and address will be shared with them. Occasionally, where we partner with other organisations, we may also share information with them (for example our Wild About Gardens campaign which is a partnership campaign with The RHS). Our Wildlife Trust also shares personal data with The Royal Society of Wildlife Trusts, but only where permission has been given when the data was gathered.

## **10. 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:

Director of Finance and resources  
Telephone: 01539 816300  
Email: [mail@cumbriawildlifetrust.org.uk](mailto:mail@cumbriawildlifetrust.org.uk)  
Cumbria Wildlife Trust, Plumgarths, Crook Road,  
Kendal, Cumbria LA8 8LX

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



We update this policy periodically.  
Last updated: November 2022

## Cookies policy

### First party cookies

This site uses cookies in several places – we've listed each of them below with more details about why we use them and how long they will last.

### Cookies set by this website

Name	Purpose	Typical content	Expires
The Wildlife Trusts	Used by the website to remember cookie preferences.	cookie-agreed, MCPopupClosed	On site entry
SESSxxxID	Authentication session to prevent having to login multiple times in one browser session. This is only set if you authenticate via the site. This may happen if you purchase items from the shop or make use of our commenting	A unique id that ties the current session to a database settings table	One week
has_js	This helps the website understand browser Javascript functionality	An on/off flag that denotes whether or not the browser supports Javascript	On site exit
Online forms	NO_CACHE	This cookie is essential for our webforms to operate. It is set only for those people using the form, and prevents the browser from storing the information you enter. This cookie is deleted when you close your browser.	NA
Cookie_agreed	This cookie collects information about whether or not the user has agreed to cookies.	Yes/No	100 days

## Third party cookies

We use a number of suppliers who may also set cookies on their websites' on its behalf. This site does not control the dissemination of these cookies. You should check the third party websites for more information about these.

We remarket to our website visitors via the collection, sharing, and use of personal data for personalization of ads. You can update your Google settings here:

[g.co/adsettings](https://www.google.com/settings/ads)

Provider	Name	Purpose	More info
Google Analytics	_utma _utmb _utmc _utmz	<p>These cookies are used to collect information about how visitors use our site.</p> <p>We use the information to compile reports and to help us improve the site.</p> <p>The cookies collect information in an anonymous form, including the number of visitors to the site, where visitors have come to the site from and the pages they visited.</p>	<a href="#">Google Privacy policy</a>
Add this	_atuvc xtc uid uvc uit psc	<p>These cookies are created by the AddThis social sharing site. AddThis does collect some information such as which web page you came from, which type of browser you are using, and your general geographic location. If you use the AddThis tool to share content they aggregate data about what pages are shared, when, and how. They also assign your web browser a unique identifier. This ID doesn't, and can't, say anything about you, it's a random series of numbers and letters used to distinguish users from each other.</p>	<p><a href="#">Add this Privacy Quick Summary</a></p> <p><a href="#">Add This Privacy Policy</a></p> <p><a href="#">Add This Data Collection Opt-Out</a></p>
FontDeck		<p>Fontdeck sets a single session cookie for each font requested. Each cookie contains (nothing but) a random string used solely as part of our caching and font security measures. The cookies are removed as soon the browser is closed (or the session otherwise ends). They contain no personal information and are not used for gathering analytics or tracking at a personal or aggregate level. Their sole purpose is to check whether we should serve the webfont from cache or not.</p>	<a href="#">FontDeck Privacy Policy</a>

Provider	Name	Purpose	More info
Wufoo	wildlifetrusts40	This is a session ID cookie used to identify unique visitors completing forms on our site. If you have your browser set to reject cookies the forms may not work correctly.	<a href="#">Wufoo Privacy Policy</a>
Facebook	_fbp, fr	Used by Facebook for sharing content, conversion tracking, optimisation and marketing.  We may implement a Facebook website tag to collect conversion tracking data.	<a href="#">Facebook Privacy Policy</a>
Twitter		We may implement a Twitter website tag to collect conversion tracking data.	<a href="#">Twitter Privacy Policy</a>
Microsoft		We may use Microsoft Clarity, a user behavior analytics tool, to help us understand how our visitors are interacting with our website through session replays and heatmaps. We use the information to compile reports and help us improve the site. Microsoft collects or receives Personal Data from you to provide Microsoft Advertising.	<a href="#">Microsoft Privacy Policy</a>
Paypal	AKDC, LANG, X-PP-SILOVER, akavpau_ppsd, enforce_policy, nsid, ts, ts_c, tsrce, x-csrf-jwt, x-pp-s	Used to support payment services.	<a href="#">Paypal policy</a>
Vimeo	player, vuid	Used to embed videos from Vimeo using cookies that we consider essential to the video player experience. Does not use third-party analytics or advertising cookies.	<a href="#">Vimeo policy</a>
Eventbrite	_ga, _gat, _gid, AS, csrftoken, eblang, G, janus_re, mgref, SP, SS, ebGAClientId, lux_uid, SERVERID	Used to deliver event booking services and content tailored to the user's interests.	<a href="#">Eventbrite policy</a>
Google	IDE, _ga, _gat, _gat_UA-xxxxxxx-xx, _gid	Used to understand website usage including how users found and explored our site and how their experience can be enhanced. Google also provides campaign tracking, advertising and website functionality services.	<a href="#">Google policy</a>

Stripe	__stripe_mid, __stripe_sid	Used for making card transactions on the website. Provided by Stripe.com which allows online transactions without storing any credit card information.	<a href="#">Stripe policy</a>
New Relic	JSESSIONID	Anonymously maintains a user's browsing session on the website to allow us to monitor and troubleshoot website performance.	<a href="#">New Relic policy</a>
MailChimp		MailChimp automatically places single pixel gifs, also known as web beacons, in bulk email sent by Cumbria Wildlife Trust. These are tiny graphic files that contain unique identifiers that enable Cumbria Wildlife Trust to recognize when their subscribers have opened an email or clicked certain links. These technologies record each subscribers email address, IP address, date, and time associated with each open and click for a campaign. MailChimp uses this data to create reports for Cumbria Wildlife Trust about how an email campaign performed and what actions subscribers took.	<a href="#">WebChoices Digital Advertising Alliance Opt-Out Tool</a>  <a href="#">Your Online Choices Guide to Online Behavioural Advertising</a>
Ecwid		We embed our shop from Ecwid.	<a href="#">Ecwid privacy policy</a>
Disqus		We embed commenting from Disqus.	<a href="#">Disqus use of cookies</a>
Hotjar	_hjSessionUser_xxxxxx, _hjFirstSeen, _hjAbsoluteSessionInProgress, _hjIncludedInSessionSample, _hjSession_xxxxxx, _hjIncludedInPageviewSample	Anonymously analyses how the website is being used to improve the user experience.	<a href="#">Hotjar cookie information</a>

Most web browsers allow some control of most cookies through the browser settings. To find out more about cookies, including how to see what cookies have been set and how to manage and delete them, visit [www.allaboutcookies.org](http://www.allaboutcookies.org)

To opt out of being tracked by Google Analytics across all websites visit <http://tools.google.com/dlpage/gaoptout>

### **YouTube cookies**

We embed videos from YouTube. This may set cookies on your computer, particularly if you are logged into a Google or YouTube account. To find out more, please visit [YouTube's embedding videos information page](#).