

# Privacy Policy

## 1. Who are we?

The Initiative for Nature Conservation Cymru (INCC) was founded in 2018 as a charitable incorporated organisation (charity number: 1180113). Our vision is of '*a Wales with more wildlife in more places, created by a society that intrinsically values the natural world*'.

INCC was formed in response to the growing need for a truly independent nature conservation organisation for Wales. An organisation that was able to speak out and challenge environmental decision makers to do more for wildlife and nature conservation in Wales. To help achieve this we undertake a wide variety of nature conservation activities, including:

- Targeted species and habitat conservation projects
- Research, surveys and monitoring
- Practical habitat management and landowner advisory
- Community engagement and education
- Advocacy and campaigns

To remain uncompromised and objective we do not seek or accept direct funding from Welsh Government or its statutory environmental body. Instead, INCC relies on the generosity of individual supporters, grant giving trusts and foundations.

## 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 INCC, or to 'we' or 'us' refer to the **Initiative for Nature Conservation Cymru (Charity Number 1180113)**.

We use four 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](http://www.ico.org.uk))

'Personal data'	Personal data is information about who you are, where you live, what you do and more. It's any and all information that identifies you as a data subject. This can include (but is not limited to) name, address, photographs, financial information.
'Data subject'	This is you, one of our loyal members and supporters. Someone who can be identified from personal data. As the data subject, we respect your right to control your data.
'Data controller'	This is us, INCC. With your permission, we determine why and how your personal data are used (as outlined in this policy). It is our responsibility to protect the data from harm.
'Data processor'	This is a person, or organisation, which 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 large-scale tasks like this) or our website contractors.

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. It sets an agreed standard for the security of any shared data. 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.

You can contact us about the information we hold about you, or about our privacy policy, contact details are given at the end of this document.

### **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 and hold your personal data is outlined below:

**a) To administer your support for INCC and/or Natur Cymru magazine**

We collect your personal data to administer your relationship with us as a supporter, which may involve:

- Sending you supporters' welcome information when you first join us.
- Processing your subscription payments and donations, including via direct debit and card payments.
- Sending you your renewal letter.
- Getting in touch should there ever be any issues processing your subscription or donation payments.

The ICO define the lawful basis for processing your data for these purposes as 'contractual'.

**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 on to.

The ICO define the lawful basis for processing your data for these purposes as '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 might include responding to your queries, organisational updates and reports, fundraising appeals, events, campaigning opportunities, membership, services, products, newsletter requests, feedback, competitions, and other of our charitable activities, as well as information about other carefully selected organisations that we work in partnership with. 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 defined as 'direct marketing' by the ICO. Additional considerations in this area include:

**When your Natur Cymru subscription or recurring payment has ended**

Unless we hear from you directly, we may continue to send you information about our work for up to 6 months after your subscription has ended. This is just in case your support was cancelled or lapsed accidentally, by for example changing your bank account details, and you wish to update your details with us.

**Tailoring our relationship with you as a supporter**

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.

As defined by the ICO, we use two different lawful bases for processing your data for 'direct marketing' purposes as outlined above:

### **Legitimate interest**

This is where we have identified a genuine and legitimate reason 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).

### **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 not 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 an INCC volunteer, we collect your personal data so that we can keep in touch with you about, for example:

- 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
- Managing your safety in our workplace

As defined by the ICO, the lawful basis for processing your data for these purposes is '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, primarily contact information, including your name, postal address, telephone number and email address. Most of the time, we collect this data from you directly. Sometimes this is in person; other times, it is over the telephone, via our website, 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 towards fundraising appeals.
- Your preferences of how you would like us to contact you.
- Ways in which you've helped us through volunteering your time.
- Records of our events you've attended, or campaigns or activities that you've been involved in.
- The language in which you prefer to correspond with us.

Very occasionally we may 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.

We may also store geodemographic data generated through commercial tools to inform our fundraising and communication work with supporters. 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.

### **c) Our website**

We will collect your personal data via our website when it is needed for us to service our relationship with you as a supporter, subscriber or individual with a query about our work.

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 to:

- Make our website work as you would 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.

#### **d) 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 and members.

However, there are some situations where this may 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.

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 one of our events. 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.

#### **e) 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) Personal data security**

All 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 ICO.

Electronic data and databases are stored on secure computers, password-protected areas of portable devices at secure locations, and GDPR-compliant online storage systems.

We control who has access to information (using both physical and electronic means). All staff and trustees are made aware of INCC's data security protocols including the necessity to:

- Have password protected computers and phones.
- Not store personal data on portable devices without password protection.
- Not use third party file sharing websites for personal data (with the exception of those belonging to organisations with whom we have a data processing contract).

## **b) Payment security**

All electronic INCC 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 Natur Cymru online we will pass your credit card details securely to our payment providers (GoCardless and Stripe). Other payment methods are handled in a similar manner. INCC 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.

## **6. Data retention policy**

The actual period for records to be kept will depend on a number of factors, including but not necessarily limited to:

- legal requirements
- storage costs
- INCC's need to access the document
- historical value
- industry standards or best practice
- archival needs (permanent preservation)
- decision by trustees (in the absence of guidance on the above)

We will only use and store information for as long as it required to support the organised creation, retrieval, appropriate storage and preservation of INCC's operational records.

We will delete your personal data if:

- You request that your data is removed.
- Your subscription to Natur Cymru or recurring donation is cancelled

In such cases your details will be deleted from our website, online backup systems and hardware. Timescales are provided within our Data Protection Policy.

We continually review what information we hold and delete what is no longer required.

## **7. Your rights**

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

- 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.
- The right of access. You have the right to ask us for copies of your personal information. 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.
- The 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.
- The right to erase. You have the right to ask us to erase your personal information in certain circumstances.
- The right to restrict processing. You can ask us to stop using your personal data.
- The 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.
- The right to object. You can ask to be excluded from marketing activity.
- The right to restriction of processing. You have the right to ask us to restrict the processing of your personal information in certain circumstances.
- The right to object to processing. You have the right to object to the processing of your personal information 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. Our contact details are given at the end of this document.

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

## 7. Making a complaint

INCC 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, 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.

### **Responsibility**

Overall responsibility for this policy lies with INCC's Board of Trustees and the policy's implementation with the Chief Executive Officer.

For further information on how to make a complaint, please see the 'Get in touch' section at the end of this document.

### **Information Commissioner's Office (ICO)**

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 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. 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:

The Chief Executive Officer

Telephone: 07821 397625


Email: info@incc.wales

Address: INCC, Science Centre, National Botanic Garden of Wales, Llanarthne,  
Carmarthenshire, SA32 8HG

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

**Signed on Behalf of INCC Trustees:**

Name:

A handwritten signature in black ink, consisting of several loops and a long vertical stroke, positioned to the right of the word 'Name:'.

Date: 21/02/2024

We update this policy periodically. Last updated: 31 August 2023