

## PRIVACY POLICY

The privacy and security of your personal information is extremely important to us. This privacy policy explains how and why we use your personal data, to make sure you stay informed and can be confident about giving us your information.

By using our website, social media pages or providing your information you consent to our collection and use of the information you provide in the way (s) set out in this policy.

We may make changes to this policy from time to time. If we do so, we will post the changes on this page, and they will apply from the time we post them.

### WHO ARE WE?

(use this section to explain why your company formed and what it plans to do).

### OUR COMMITMENT TO YOUR PRIVACY

We are committed to keeping the personal details of our 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 (Company name), (abbreviation if applies) or to 'we', 'our' or 'us' refer to:

- (Company name). We are a (type of organisation) registered in (enter details), and our registered number is (enter registration number).

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](http://www.ico.org.uk)).

- 'Data subject': this is you, one of our supporters. As the data subject, we respect your right to control your data.
- 'Data controller': this is us, (Company name). 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, which processes your data on our behalf, with your permission.

When we work with other organisations or individuals that act as Data Processors, we will ensure that such arrangements comply with data protection legislation. 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 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:

(enter contact position)  
(enter contact phone number)  
(enter email)  
(enter registered address)

Our office hours are (enter details).

## **WHY DO WE COLLECT YOUR PERSONAL DATA?**

We will only ever collect, store, and use your personal data when we have an identified purpose and reason to do so, this will usually be for information about our work, to invite you to attend appropriate events, fundraising purposes, office management (though we are regulated in these activities by the Fund-Raising Regulator) and feedback and other legitimate interests. The ICO refers to this as a 'lawful basis'.

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 events you have been involved with helps us to send you information about any events that we feel you would like to hear about.

(Company name) will only contact you for the following reasons (though these may be updated from time to time as our operations change):

### **a) Fundraising or supporting a particular LBF initiative**

(Company name) undertakes very little 'direct marketing' however occasionally our newsletter or other mailshots will include calls for support for some initiative or funds (though of course these are regulated by the Fundraising Regulator). As a matter of politeness (Company name) will always have a policy which enables any recipients of such information to unsubscribe, and practice will continue with opt in provisions and a provision for removal from our database in the normal way. (Company name) does not undertake unsolicited marketing, we find that it annoys people.

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

If you are a (Company name) volunteer, we collect appropriate personal data so that we can keep in touch with you about, for example:

- details and changes to planned volunteer work programmes that you may be taking part in
- the positive impact you have on our work, by sending you relevant newsletters

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).

### **c) To buy or sell goods or services**

We collect personal data to comply with contractual responsibilities when we buy and sell goods and services from others.

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

### **d) To meet our legal obligations**

We collect personal data in order to comply with legal obligations such as providing information to bodies such as HMRC, MMO, Companies House, MCA, HSE and others.

The ICO define the lawful basis for processing personal data for these purposes as 'legal obligation'.

#### **e) To enable effective functioning of our organisation**

We collect personal data to enable (**Company name**) to operate effectively in a variety of ways such as:

- liaising with government, authorities and local communities about fishing and policy activities
- running engagement activities such as conferences, events and educational outreach
- evaluating events, campaigns and website activity
- office management
- research and statistical analysis
- responding to feedback, complaints and compliments to staff,
- complying with regulators eg, Fundraising Regulator, the CIC Regulator, MMO and IFCA's
- safeguarding, health and safety, security

The ICO define the lawful basis for processing personal data for these purposes as 'legitimate interest'.

### **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, email address, telephone number and in some cases your business/personal address.

Most of the time, we collect this data from you directly. Sometimes this is in person; other times, it is by email, over the telephone or in writing. Occasionally we obtain information, such as your email address or telephone number or other contact details, from an existing supporter/contact who deems that you have a legitimate interest in (**Company name**) work.

#### **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 have made
- your preferences of how you would like us to contact you
- ways you have helped us through volunteering your time
- records of events you have attended and meetings you've had with members of the team.

Sometimes we may collect other information about you. When we do so, will be very clear as to why we are collecting such information, and we will only do so with your specific consent and permission.

If you do not wish for your data to be collected in any of these ways, or have questions about them, please contact us.

(enter contact position)  
(enter contact phone number)  
(enter email)  
(enter registered address)

Our office hours are (enter details).

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

#### **c) Sensitive personal data**

We do not normally collect or store sensitive personal data (such as information relating to health or emergency contact details) about supporters. However, there are some situations where this will occur (such as for volunteers' medical conditions)

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.

We may also collect sensitive personal data if you have an accident on one of our project locations. 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 will 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.

### **HOW DO WE STORE YOUR DATA?**

#### **a) Security**

All the personal data that is processed by (Company name) is done so 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). (Company name) are carefully monitoring the implications of Brexit on this arrangement. 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). We have documents relating to data protection procedures which personnel are required to follow when handling personal data.

#### **b) Payment security**

When processing donations via our website, visitors are re-directed to their own banking facility, or pay-pal.

(Company name) complies with the payment card industry data security standard (PCI-DSS) published by the PCI Security Standards Council and will never store card details.

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.

## **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, please email ([enter details](#)).

### **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.

## **FEEDBACK TO ([Company name](#))**

### **a) Positive Feedback**

([Company name](#)) staff are incredibly committed to the organisation and its aims and ambitions. We live in a world which is increasingly fractious, and while we want to hear about any mistakes or concerns, we also want to hear about actions which ([Company name](#)) staff have undertaken which has genuinely made a difference. Any correspondence on these matters can be treated as

confidential if required – but such correspondence is incredibly useful to the morale of the organisation and for the (Company name) board.

## **b) Making a complaint and other feedback**

If there are issues with the provision our activities, 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.

### **Responsibility**

Overall responsibility for this policy and its implementation lies with the (enter contact position).

If you wish to give feedback: positive, negative or just useful, then please contact us:

(enter contact position)  
(enter contact phone number)  
(enter email)  
(enter registered address)

Our office hours are (enter details).

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)

## LINKS TO THIRD PARTY WEBSITES

Our websites contain links to third party websites that we believe may be of interest to our website visitors. This privacy policy only governs our websites, and we are not responsible for the privacy policies that govern third party websites even where we have provided links to them. If you use any link on our website, we recommend you read the privacy policy of that website before sharing any personal or financial data.

## SOCIAL MEDIA SITES

We operate a number of social media pages (including Facebook, Twitter, Vimeo and Instagram). Although this policy covers how we will use any data collected from those pages it does not cover how the providers of social media websites will use your information. Please ensure you read the privacy policy of the social media website before sharing data and make use of the privacy settings and reporting mechanisms to control how your data is used.

## 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:

(enter contact position)  
(enter contact phone number)  
(enter email)  
(enter registered address)

Our office hours are (enter details).