

1. Introduction

The Anne Carpmael Trust CIO (hereafter called "The Trust", "us", "we" or "our") is committed to respecting your privacy and to complying with applicable data protection and privacy laws. You can visit our website without disclosing any personally identifiable information about yourself (please note that we do not currently use cookies on our website – see our Cookie Policy in section 8 below – for more information).

If you do submit personal information by, for example, emailing us, signing-up on our "Keep in Touch" Form, sponsorship, or completing a web form registration, you can be assured that we will use your personal information only to support your continuing relationship with The Trust. We have provided this Privacy Notice to help you understand how we collect, use and protect your information when you visit our website.

We wish to help you make informed decisions, so please take a few moments to read the sections below and learn how we may use your personal information.

2. Personal information collected by The Trust

1. *Who is collecting the data?*

The Anne Carpmael Trust CIO is the organisation collecting personal data and is the designated data controller for the purposes of the General Data Protection Regulations (GDPR). The contact details of The Anne Carpmael Trust CIO are:

Withymead Nature Reserve, Bridle Way, Goring on Thames, Oxfordshire RG8 0HS.

Email: info@withymead.org.

Imogen Smart is the nominated Data Protection Officer (DPO).

2. *Why does The Trust collect personal data?*

The Trust collects data required for the purpose of promoting Withymead Nature Reserve and Little Meadow, and in connection with other activities related to the reserves and wildlife conservation in general. It also collects data in order to contract with sponsors, suppliers and sub-contractors and to interact with donors and volunteers.

3. *What data is collected?*

The data collected may comprise: name, postal address, email address, contact telephone numbers and source of knowledge of The Trust.

4. *What is the source of the data collected?*

All data processed by The Trust is supplied by you, its visitors, or its volunteers, Friends, sponsors, donors, suppliers, or sub-contractors or is sourced from publicly available information. The Trust does not acquire personal data from any third parties.

5. *What processing does The Trust undertake with the personal data collected?*

Processing of data is required for us to perform transactions with you, our visitors, and also with our volunteers, Friends, sponsors, suppliers, sub-contractors and donors.

This includes: sending you newsletters by mail or email; communicating with you by mail, email and telephone (such as sending you amendments to planned arrangements, wet-weather arrangements, etc.); and sending you news, updates and information about future events. We strictly limit the number of communications we make and we will never spam you or sell your data to third parties.

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6. What is the lawful basis for processing data?

The Trusts lawful bases for processing data comprises:

- *Contract*: where The Trust is entering into a contract for the sponsorship of an event or project, or a contract for the supply of goods or services with a sub-contractor or supplier, the basis for processing personal data is the pre-contractual arrangements or contractual obligations of The Trust which require such processing;
- *Legitimate interests*: where The Trust is processing data of Volunteers, Friends or donors the basis for processing personal data is the legitimate interest of The Trust to pursue the purposes and corporate objectives of The Trust in relying on legitimate interests, The Trust always undertakes a legitimate interest assessment to assess and articulate the balance of The Trusts' interests with those of the data subjects;
- *Legal obligation*: where The Trust is required to process data as a result of a legal obligation, the basis for processing the data is to fulfill the obligations The Trust has under law;
- *Consent*: where The Trust is seeking to send news, updates and information to visitors, volunteers, Friends and subscribers The Trust seeks consent of its visitors, volunteers, Friends and subscribers to do so. Consent can be withdrawn at any time by emailing info@withymead.org and requesting for consent to be withdrawn or by contacting the DPO (see details in clause 2.1 above).

7. How long will my data be held?

The Trusts' data retention policy is for the data to be held until it is no longer of use to The Trust.

Privacy Policy WP 05 Issue 2.0

Anne Carpmael Trust CIO – Charity No. 1199071

2. Data Subjects' rights

All persons who disclose their data to The Trust have the following rights:

- *Right to be informed*: This privacy notice contains the information that The Trust is obligated to disclose to you as a result of its processing of your personal data.
- *Right of access*: You have the right to obtain confirmation that your data is being processed and to access your personal data.
- *Right to erasure*: You have the right to request the deletion of your personal data where there is no compelling reason for The Trust to continue processing the data.
- *Right to restrict processing*: You have the right to request the suppression of the processing of personal data, whereby we can continue to store your data but cannot process it.
- *Right to data portability*: You have the right to obtain and re-use your personal data for your own purposes across different services.
- *Right to object*: You have the right to object to the processing of your personal data.
- *Rights related to automated decision-making and profiling*: You have the right to object to profiling and any automated decision-making and to access the data used so that you can review and edit for any accuracy issues.

If you wish to exercise any of the above rights please contact our DPO (see details in clause 2.1 above).

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3. Right to withdraw consent

You have the right to withdraw consent at any time for the processing of data to receive news, updates and information about future events and other activities related to The Trust and wildlife conservation in general. If you wish to withdraw consent please contact the DPO (see details in clause 2.1 above) or email info@withymead.org

4. Your right to lodge a complaint

You have the right to lodge a complaint at any time with the Information Commissioner's Office Helpline No. 0303 123 113 or email via the ICO website: www.ico.org.uk

5. Legal restrictions

If The Trust believes in good faith it is necessary or when required by the law, The Trust will disclose personal information to:

- Co-operate with the investigations of purported unlawful activities;
- Identify individuals who may be violating the law, a legal notice or the rights of third parties;
- Comply with legal requirements or any legal notice or process served on The Trust; and
- Protect or defend the rights or intellectual or physical property of The Trust, The Trust website or visitors to the website.

6. Security

The Trust takes great care to ensure the security of all data received from customers' personal computers to the servers we use and all stored information on our systems. Access to stored information is password protected. The Trust does not store any credit card or banking details on its website or other information systems.

7. IP Address

The website does not currently have the facility to track visitors to its website.

8. Cookies and Analytics

Our website does not currently have Cookies which would facilitate the tracking of visitors on our website.

We use MailChimp for our newsletter and e-shots. MailChimp uses analytical and performance cookies.

- Analytical/performance cookies: Basic cookies* allow us to recognise and count the number of times visitors open our newsletter visitors and to see how visitors move around our newsletter or link to our website or other links. This helps us to improve the way we present our newsletter. Below are examples of when we will use these cookies:
 - o statistical information and log data about the number of visits to certain pages on the site;
 - o the pages you viewed and activities you carried out during your visit; the time and date of your visit.

Dated: 23.10.23

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