

Stafford Riverway Link Privacy Policy

THE POLICY IN BRIEF

Stafford Riverway Link CIC (SRL) is committed to protecting your privacy and security. This policy explains how and why we use your personal data, to ensure you remain informed and in control of your information.

It's important that you read the full policy to understand what information we hold, how we may use it, and what your rights are. The full policy is accessible on our web site (www.stafford-riverway-link.co.uk) – but if you don't have time to read it all now, here's a quick summary:

SRL asks all members and supporters to “opt-in” for marketing communications. This means you have the choice as to whether you want to receive these messages and be able to select how you want to receive them (email, phone, SMS or post).

You can decide not to receive communications or change how we contact you at any time. If you wish to do so, please contact the Membership Secretary.

We will never sell your personal data, and if we share your personal data, it will only ever be with our partner organisations where necessary to provide services, and only then if we are certain that its privacy and security are guaranteed.

- We collect information that is personal data (eg. name, telephone number, postal address, email address).
 - We collect information about members, supporters, and volunteers.
 - We collect information to enable us to fundraise, for administration and to provide goods.
 - We only collect the information that we need or that would be useful to us in our quest to provide the best possible service.
 - We do our best to keep personal information secure. (See sections 7 and 8 on how we protect and store your data.)
 - We never sell your data and we will never share it with another company or charity for marketing purposes.
 - We will not share your data, unless we are required to by law or to organisations we work with where necessary to provide SRL services (such as for mailing of our newsletter), and only then provided that the privacy and security of data is guaranteed. (See section 4.).
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THE PRIVACY POLICY IN FULL

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1. WHO ARE WE?

“We” and “Us” is Stafford Riverway Link CIC. (SRL).

Your personal data (i.e. any information which identifies you, or which can be identified as relating to you personally) will be collected and used by SRL.

For the purposes of data protection law, SRL will be the controller.

2. WHAT INFORMATION WE COLLECT

2.1 Personal data that you provide

We collect data you provide to us. This includes information you give when joining or registering, placing an order or communicating with us. There are several means by which SRL collects personally identifiable data, for example:

- personal details (name / adult or child / email address / postal address / telephone number) when you join as a member, donate as a supporter or sign-up as a volunteer;
- personal details (health, next of kin, and age for under 18s) when you sign up as a volunteer
- financial information (payment information such as bank details). Please see Section 7 for more information on payment security);
- Information created by your involvement with SRL.

Your activities and involvement with SRL will result in personal data being created. This could include details of how you've helped us by volunteering or being involved with our campaigns and activities. If you decide to donate to us then we may keep records of when and how much you give to a particular cause.

2.2 Information we generate

We may conduct research and analysis on the information we hold, which can in turn generate personal data. For example, by analysing your interests and involvement with our work we may be able to build a profile which helps us decide which of our communications are likely to interest you. (Section 6 Research and profiling) contains more information about how we may use information for profiling and targeted advertising.

2.3 Information from third parties

We sometimes receive personal data about individuals from third parties. For example, if we are partnering with another organisation (e.g. you provide your information to another charity we're collaborating with on a restoration project).

We may collect information from social media where you have given us permission to do so, or if you post on one of our social media pages.

2.3 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 will occur (e.g. if you volunteer with us or if you have an accident on one of our volunteering activities). If this does occur, we'll take extra care to ensure your privacy rights are protected.

2.4 Accidents or incidents

If an accident or incident occurs on our property, at one of our events or involving one of our volunteers then we'll keep a record of this (which may include personal data and sensitive personal data).

2.4 Volunteer

If you are a volunteer then we may collect extra information about you (e.g. details of emergency contacts, medical conditions etc.). This information will be retained for legal reasons, to protect us (including in the event of an insurance or legal claim) and for safeguarding purposes.

3. HOW WE USE INFORMATION

We only ever use your personal data with your consent, or where it is necessary in order to:

- enter into, or perform, a contract with you;
- comply with a legal duty;
- protect your vital interests;
- for our own (or a third party's) lawful interests, provided your rights don't override these.

- In any event, we'll only use your information for the purpose or purposes for which it was collected (or closely related purposes).

3.1 Marketing

We use personal data to communicate with people, to promote SRL and to help with fundraising. This includes keeping you up to date with our news, updates, campaigns and fundraising information. For further information on this see Section 5 on marketing.

3.2 Administration

We use personal data for administrative purposes (i.e. to carry out our work). This includes:

- receiving annual subscriptions and donations
- maintaining databases of our volunteers, members and supporters
- performing our obligations under membership contracts
- fulfilling orders for goods or services (whether placed online, over the phone or in person)
- helping us respect your choices and preferences (e.g. if you ask not to receive marketing material, we'll keep a record of this).

3.3 Internal research and analysis.

We may, in the future, carry out research and analysis on our supporters, donors and volunteers, to determine the success of campaigns and appeals, better understand behaviour and responses and identify patterns and trends. This will help inform our approach towards campaigning and makes SRL a stronger and more effective organisation. Understanding our supporters, their interests and what they care about also helps us provide a better experience (e.g. through more relevant communications).

3.4 Supporter research and profiling

We may occasionally evaluate, categorise and profile personal data in order to tailor materials, services and communications (including targeted marketing) and prevent unwanted material from filling up your inbox. This also helps us understand our supporters, improve our organisation and carry out research. Further information on profiling can be found in Section 6 research and profiling.

4. DISCLOSING AND SHARING DATA

We will never sell your personal data.

If you have opted-in to marketing, we may contact you with information about our partners, or third party products and services, but these communications will always come from SRL and are usually incorporated into our own marketing materials (e.g. advertisements in newsletters).

We may share personal data with subcontractors or suppliers who provide us with services. For example, some of our mail is mailed by Stafford Boat Club and so your name and address is shared with them. Occasionally, where we partner with other organisations, we may also share information with them (for example, if you register to attend an event being jointly organised by us and another group).

We'll only share information when necessary and we'll make sure to notify you first.

We will only ever share your data with such organisations where necessary to provide services and if the privacy and security of your data are guaranteed.

5. MARKETING

SRL asks its supporters to “opt-in” for most communications. This includes all our marketing communications (the term marketing is broadly defined and, for instance, covers information about our campaigns, events, news and SRL). This means you’ll have the choice as to whether you want to receive these messages and be able to select how you want to receive them (post, phone, email, text). This does not mean that all messages will be available in all formats.

You can decide not to receive communications or change how we contact you at any time. If you wish to do so please contact the membership secretary.

5.1 What does ‘marketing’ mean?

Marketing does not just mean offering things for sale, but also includes news and information about:

- our campaigns, restoration and protection work;
- SRL offers;
- volunteering opportunities and how you can help restore our canals;
- appeals and fundraising (including donations and also competitions, raffles etc.);
- our events and activities
- products, services and offers (our own, and those of third parties which may interest you);
- leaving a legacy;

When you receive a communication, we may collect information about how you respond to or interact with that communication, and this may affect how we communicate with you in future.

5.2 Newsletters and magazines

Our Newsletters are sent to all our members by email or post (unless you specifically ask us not to). However, please be aware that our Newsletters may include advertisements, inserts, competitions and fundraising information.

5.3 Fundraising

As a Community Interest Company (CIC) we rely on donations and support from others to continue our campaign work. From time to time, we will contact members and supporters with fundraising material and communications. This might be about an appeal, a competition we’re running, or to suggest ways you can raise funds (e.g. a sponsored event or activity, or buying a product for which SRL will receive the proceeds).

As with other marketing communications, we’ll only contact you specifically about fundraising if you’ve opted into to receiving marketing from us (and you can, of course, opt out at any time).

6. RESEARCH AND PROFILING

We do not currently use profiling but we may in the future if it would enable us to understand our supporters, improve our relationship with them, and provide a better supporter experience.

6.1 Analysis and grouping

We occasionally analyse our supporters to determine common characteristics and preferences. We would do this by assessing various types of information including behaviour (e.g. previous responses) or demographic information (e.g. age or location). By grouping people together on the basis of common characteristics, we can ensure that group is provided with communications, products, and information which is most important to them. This helps prevent your inbox from

filling up, and also means we aren't wasting resources on contacting people with information which isn't relevant to them.

6.2 Profiling to help us understand our supporters

We may occasionally profile supporters in terms of financial and practical support. For example, we may keep track of the amount, frequency and value of each person's support. This information helps us to ensure communications are relevant and timely.

We collect information on preferences and interests (e.g. whether you are interested in volunteering or attending events) so that we know what material you are mostly likely to be interested in.

6.3 Anonymised data We may aggregate and anonymise personal data so that it can no longer be linked to any particular person. This information can be used for a variety of purposes, such as recruiting new supporters, or to identify trends or patterns within our existing supporter base. This information helps inform our actions and improve our campaigns, products/services and material.

7. HOW WE PROTECT DATA

We employ a variety of physical and technical measures to keep your data safe and to prevent unauthorised access to, or use or disclosure of your personal information. (eg: we retain the original copies of membership application forms in a secure file and only transfer the data from these to a computer database that is needed to match your "opt in" requirements. All computer files are password protected).

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.

7.1 Payment security

All electronic SRL forms that request financial data will transfer to a third party provider which uses the Secure Sockets Layer (SSL) protocol to encrypt your data. If you use a credit card to donate, purchase a membership or purchase something on-line we will use third party providers (eg: Just Giving for donations). These payment methods comply with the payment card industry data security standard (PCI-DSS) published by the PCI Security Standards Council. We never store your card details.

8. HOW WE STORE YOUR DATA

As is common to the majority of organisations such as ours data held on our computer databases are often backed up onto "cloud" based servers. Where we store information SRL's operations are based in the UK. Some organisations which provide services to us may transfer personal data outside of the UK but we'll only allow them to do so if we believe your data is adequately protected. For example, some of our systems use Microsoft products. As a US company, it may be that using their products result in personal data being transferred to or accessible from the US. However, we accept this as we are certain personal data will still be adequately protected (as Microsoft is certified under the USA's Privacy Shield). We do not ask for, or store, financial details on these third party servers.

8.1 How long we store information

We will only use and store information for so long as it is required for the purposes for which it was collected.

We may also be required to store data to satisfy legal requirements, for financial audit purposes or to satisfy insurance requirements.

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

We never store payment card information.

If you ask us not to send you marketing emails, we may retain your email address to ensure that we don't send marketing material to that e-mail address (though we'll keep a record of your preference not to be emailed). We may also retain your email address for other purposes, such as for administration if you are a member of SRL.

9. KEEPING YOU IN CONTROL

We want to ensure you remain in control of your personal data. Part of this is making sure you understand your legal rights, which are as follows:

- the right to confirmation as to whether or not we have your personal data and, if we do, to obtain a copy of the personal information we hold (this is known as a subject access request);
- the right to have your data erased (though this will not apply where it is necessary for us to continue to use the data for a lawful reason);
- the right to have inaccurate data corrected;
- the right to object to your data being used for marketing or profiling;
- where technically feasible, you have the right to see the personal data you have provided to us which we process automatically on the basis of your consent. This information will be provided in a common electronic format.

Please keep in mind that there are exceptions to the rights above and, though we will always try to respond to your satisfaction, there may be situations where we are unable to do so.

9.1 Complaints

If you have a complaint about the way your data is processed, you can complain to SRL (email srl2010@hotmail.co.uk). If you are not happy with our response, or you believe that your data protection or privacy rights have been infringed, you can complain to the UK Information Commissioner's Office which regulates and enforces data protection law in the UK. Details of how to do this can be found at www.ico.org.uk

10. CHANGES TO THIS PRIVACY POLICY

We'll amend this Privacy Policy from time to time to ensure it remains up-to-date and accurately reflects how and why we use your personal data.

The current version of our Privacy Policy will always be posted on our website. (www.stafford-riverway-link.co.uk)

This Privacy Policy was last updated on 18 Feb 2021.