

CPRE Sussex Privacy Policy

CPRE Sussex is a registered charity, number 1156568. The organisation is a data controller and processor under the conditions of the Data Protection Act 2018, with ICO registration number Z7953168.

Address: Brownings Farm, Blackboys, East Sussex TN22 5HG

Email: info@cpresussex.org.uk

Tel: 01825 890975

Introduction

CPRE Sussex, your local countryside charity, works to enhance, promote and protect our towns and countryside including the communities within it. We could not do this without support from people like you, and we are committed to protecting both your personal information and your privacy.

So we take your privacy seriously and aim to be clear and open about our data and security practices.

We need your consent to hold the details you are supplying within this site. All the data we gather and hold is managed in strict accordance with the Data Protection Act (1998) and in line with the General Data Protection Regulation (GDPR).

We use information collected from supporters and visitors to our website to improve the information and services we offer to you and to improve your online experience. This privacy policy sets out details of the personal information we collect about you and the ways in which we may use that information.

When do we collect personal information?

Personal information is any data that can be used to identify you.

Information you give us

We collect personal information about you when you contact us by phone, email or letter, or when you fill in an online form to undertake activities including:

- sign up for email updates
- contact us
- place orders for free or paid products or services such as events
- apply for membership or make a donation
- complete surveys or provide feedback
- sign CPRE Sussex petitions or taking part in other campaign activities

- enter competitions
- ask us for help or support in relation to an issue relating to our work.

Information we collect from you directly or from third parties with whom we work, may include:

- name, address and email address
- telephone numbers
- contact preferences
- date of birth or age
- financial information, such as bank, credit or debit card details and whether donations are gift-aided
- details of your interests and preferences (such as campaigns, issues or particular locations)

We do not use cookies to collect this type of information.

Information created by your involvement with CPRE Sussex

We may also collect and process information about your dealings with us, including details about our contacts with you through email, text, post, on the phone, through our website (or web services used by us to manage event bookings, petition sign-ups or other digital actions, such as Action Network) or in person. This might include the date, time and method of contact, details about donations you make to us, events or activities that you register for or attend or any request for support.

We may collect and record other relevant information you share with us about yourself, such as your interests or your affiliations with other charities, community or campaign groups, or your local councils.

Information we generate

We 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. We use this information to identify ways in which you could support CPRE Sussex and invite you do to so if appropriate.

Like many organisations, we can estimate how many supporters open our emails by counting how many have downloaded the images in them. We also track how many supporters click the links in our emails. By keeping track of which emails our supporters open and click, we can find out what content is popular, and therefore send more of the kind of emails our supporters read. It also means that if a supporter – like you – appears to have stopped opening or clicking emails, we can ask them why. This feedback helps us to improve our emails for the future.

Sensitive personal data

We do not, as a matter of course, 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, if you have an accident at one of our events or indicate that you wish to leave us a legacy). Before we collect any sensitive personal information, we will make it clear what information we are collecting and the purpose we are collecting it for, and we'll take extra care to ensure your privacy rights are protected.

Equality and diversity data

You may have the opportunity to share sensitive personal data with us. This includes your nationality, ethnicity, gender, disability, sexual orientation, age and religious beliefs. We would only collect such information anonymously, for use at the aggregate – and not the individual – level. Such information would only be used to report on the diversity of members or supporters, to ensure that we are inclusive and accessible to everyone. It would not be used for profiling or segmentation for marketing purposes.

Accidents or incidents

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

Volunteer

If you are a volunteer (whether for specifically CPRE Sussex, or if you are helping us for other reasons - for example you work for another organisation which is running an event with us) then we may collect extra information about you (e.g. references, criminal records checks, 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. You may also receive communications from us providing you with information about your duties as a volunteer, including your local group duties. Further detail is given in the CPRE Volunteer Privacy Policy.

What may your personal information be used for?

Campaigning for a beautiful, thriving countryside is something we cannot do without the help of people who share our passion. Raising funds, running campaigns and involving as wide a range of people as we can in our activities is hugely important to us.

If you are a CPRE member, we may, on the lawful basis of legitimate interest, use your personal information to send you information about your membership, including invitations to our AGM, or upcoming renewals. Where you have not opted-in to receive newsletters or membership publications (such as Sussex Review) by email, we will send you these by post on the same basis, unless you ask us not to.

If you are a CPRE member or supporter, and you opt in to receive communications from us (lawful basis of consent), we may use your personal information to:

- inform you of our work and the different ways in which you can help
- ask you to support a specific CPRE activity, campaign or make a donation
- set up or renew your membership
- send you publications
- inform you about CPRE Sussex events provided that you choose to receive this information
- assess and develop future CPRE Sussex services, events and activities.

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.

When we use your information, we will consider if it is fair and balanced to do so and if it is within your reasonable expectations. We will balance your rights and our legitimate interests to ensure that we use your personal information in ways that are not unduly intrusive or unfair in other ways.

If you are a CPRE member or supporter, you may at any time change your mind about receiving information from us. If you initially chose to receive such information, and subsequently decide that you no longer wish to receive information about CPRE Sussex, you can notify us by email: info@cpresussex.org.uk.

Use of Cookies

A "cookie" is a piece of information, like a tag, which some websites create on your PC. Our cookies allocate each user of this website with a random number.

This procedure does not entail the collection of any personal information. Our cookies will not be used to analyse your visits to other websites or track any internet searches you may undertake whilst on this website.

A full policy on how we use cookies on our website is set out at www.cpresussex.org.uk.

What if I do not want to accept cookies?

Your browser lets you choose whether to accept, not to accept or to be warned before accepting cookies.

Third Party Sites

Our privacy policy does not apply to third party sites that you may access from this website. We recommend you familiarise yourself with the applicable privacy policy before entering any personal information on a third party site.

Data Sharing Within CPRE Network (members only)

When you become a member of CPRE, you join both the national charity and the Sussex branch. This data is, in the first instance, processed in systems operated by national CPRE under that organisation's GDPR and Privacy Policies. The is shared with, or accessed by, CPRE Sussex for the purposes of the charity, when it is then processed under CPRE Sussex's GDPR and Privacy Policies. The national charity shares your data with us so we can keep you informed of local news and events and invite you to our Annual General Meeting. We will inform the national charity of any changes to your data as you inform us. They in turn will keep you up to date with national news, events and to invite you to their Annual General Meeting. You can choose not to receive certain communications from the national charity at any time by contacting the Data Protection Lead on supportercare@cpre.org.uk or call 020 7981 2870.

This policy applies to only your interactions with the CPRE national charity and our branch.

Data Sharing with Third Parties

We do not share, sell or swap your information with other organisations for their own marketing purpose.

There are a number of legitimate situations where we may share your information with third parties whom we have contracted to fulfil specific services for us. This will include organisations such as mail fulfilment houses and email broadcasters who send out our marketing materials on our behalf. In all of these arrangements we set up a written contractual agreement that will ensure that those organisations can only use data provided for the specific purposes we direct them to do, and that they have in place strict security requirements in order to protect your personal information.

The data for our E-newsletter is stored on Action Network and held in accordance with their Privacy Policy and Terms. New E-newsletter sign-up data is stored on Mailchimp and held in accordance with Privacy Policy and Terms, before being transferred to Action Network.

We may disclose your personal information if we are requested or required to do so by a regulator or law enforcement agency or to enforce or apply our rights (including in relation to our website or other applicable terms and conditions) or to protect CPRE Sussex, for example in cases of suspected fraud or defamation, or to comply with any other applicable legal obligation.

Security

We take great care to ensure that our websites operate at the highest security levels and that our suppliers are committed to best practice in digital security. All personal information and financial data is encrypted in transmission. However, the security of data transmission via the internet can never be 100% guaranteed, and data transmission is at your own risk.

How long do we keep information?

We do not keep your information for longer than necessary. We remove personal data from our systems in line with our data retention policy. The length of time each category of data will be retained will vary on how long we need to process it, the reason it is collected and in line with any statutory requirements.

When that point is reached, the data will either be deleted or rendered anonymous. In certain specific situations, for example where a supporter has kindly pledged a legacy to CPRE Sussex in their will, we will maintain their details up to the time when we need to carry out the legacy administration and communicate effectively with their family.

A full list of retention periods we use is set out at the end of this Policy.

Access to Your Information

You have the right to request a copy of the information that we hold about you. If you would like a copy of some or all of your personal information, you can:

- email info@cpresussex.org.uk for the attention of the Data Protection Lead
- write to the Data Protection Lead at CPRE Sussex, Brownings Farm, Blackboys, East Sussex TN22 5HG.

We will not charge you for this service unless the request is according to the law 'manifestly unfounded or excessive or repetitive'.

Keeping Your Information Up to date

We want to make sure that any personal information we hold about you is accurate and up to date. Please contact us at info@cpresussex.org.uk to correct or remove information you think is inaccurate.

Your Rights

Data protection regulations give you clear rights over how your data is used by us. You can find out more detail about your rights by visiting the Information Commissioner's Office (ICO) website's section on individual rights. The ICO regulates and enforces data protection law in the UK.

The ICO contacts details are:

Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF Tel: 0303 123 1113 (local rate) or 01652 545 745 (if you prefer to use a national rate) Registration Number for CPRE Sussex: Z7953168.

How to Find Out More or Make a Complaint

To make a formal complaint about CPRE Sussex's approach to data protection or your privacy rights, please contact the Data Protection Lead, CPRE Sussex, Brownings Farm, Blackboys, East Sussex TN22 5HG.

We will acknowledge your complaint within two working days and aim to provide a full response within 10 working days. 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 ICO.

Consent

If you have chosen to 'opt-in' receiving communications from us, you give your consent to the collection, storage, processing and use of your personal information by us as described in this Privacy Policy.

Changes to our Privacy Policy

We recognise the importance of privacy to our supporters and visitors and intend to remain at the forefront of industry developments in this area. We will keep this policy under review and any changes made from time to time will be posted on this website.

This privacy policy was last updated on 19th April 2024.

CPRE Sussex is a registered charity: number 1156568, Registered office: CPRE Sussex, Brownings Farm, Blackboys, Uckfield, E. Sussex, TN22 5HG.

CPRE Sussex Privacy Retention Periods

How long we keep your personal information

We will keep your information only for as long as we need it to provide you with the services or information you have required, to administer your relationship with us, to inform our research and campaigns into issues relevant to our charitable aims or the preferences of our supporters or to comply with the law. When we no longer need information, we will always dispose of it securely, using specialist companies if necessary, to do this work for us. We have an information and data retention policy, which we review regularly.

Some personal information we hold is retained to fulfil statutory obligations, for example there is an HMRC requirement to retain of Gift Aid declarations for a set period of 6 years. In these instances, the legal obligation is our lawful reason for continuing to retain the data and this cannot be overridden by an objection from you. However, for processing which we carry out on the basis of consent you have given us, you have the right to withdraw your consent to any particular usage of your data at any time.

The below summarises the reasons why we process data, what legal basis we are using, and how long we will keep information about different groups of people:

Relevant people	Reasons for processing	How long the information is kept
Supporters/members	To process financial donations, 500 Club and membership payments.	Up to 6 years after your last transaction or donation to comply with our statutory obligations.
Supporters/members	To send marketing & campaigns communications (including fundraising and petitions).	On the basis of opt-in consent for communications, the information will be kept and consent assumed until: - The individual withdraws consent or otherwise notifies us of a desire to end communication; or - Our processing operations or purposes change beyond that original consented to; or - The individual appears to have stopped opening emails or responding to post for a period of 6 months, and does not actively reconsent in response to 'reactivation' emails/telephone calls/SMS/post (as originally consented to) within a further period of 6 months; - whichever is sooner.
Supporters/members	To send membership communications.	For as long as your membership subscription is active plus 6 years in line with HMRC requirements.
Supporters/members	To send event communications such as outings, seminars, social events, public meetings and training workshops.	For as long as your membership subscription is active plus 2years.
Supporters/members who indicates a wish to leave a legacy	To preserve information relating to your relationship with us over the years so that we can best honour your future wishes where you have indicated that you are intending to leave a gift in your Will.	We will keep information on such people until the date of their death plus 3 years.

Volunteers	To administer and enhance your volunteer experience with us. This includes ensuring we have up-to-date contact details and training records.	For the duration of your time as a volunteer, plus 2 years after you finish to comply with our legal obligations. Information gathered during your suitability assessment, such as your reference details, is deleted after 6 months. Basic information about your activities may be however retained indefinitely for heritage purposes. For the period of your service plus a maximum of 80 years.
Job/volunteer applicants	To assess your suitability for an employed or voluntary role at CPRE Sussex.	12 months from the point at which you submitted your application.
Employees	To manage your employment. To set up, manage and administer pensions.	7 years from end of employment or until any CPRE funded pension is claimed.

Policy Adopted at Executive Meeting: 19/04/2024

Review date: 19/04/2026