BRADLEY CANAL RESTORATION SOCIETY (BCRS)

PRIVACY POLICY

Updated: 14/12/2019

Introduction

Welcome to the BCRS's privacy policy.

BCRS respects your privacy and is committed to protecting your personal data.

Purpose of this privacy policy

This privacy policy aims to give you information on how BCRS collects and processes your personal data including any data you may provide through this website for example when you sign up to our newsletter or complete a form. This website is not intended for children and we do not knowingly collect data relating to children. This privacy policy supplements other notices and privacy policies and is not intended to override them.

The BCRS deals with your data regardless of source in accordance with this privacy policy.

Controller

The Bradley Canal Restoration Society (Registered Charity Number: Pending) is the controller and responsible for your personal data (collectively referred to as "BCRS", "we", "us" or "our" in this privacy policy).

If you have any questions about this privacy policy, including any requests to exercise your legal rights, please contact *info@bradleycanal.co.uk*.

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues (www.ico.org.uk). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

Changes to the privacy policy and your duty to inform us of changes

We keep our privacy policy under regular review.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

Third-party links

This website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy policy of every website you visit.

Our membership and donation portal is hosted by GoldenGiving.com which is based in the UK and whose privacy policy is here: <u>https://www.goldengiving.com/privacy-policy</u>. For example, Golden Giving collects data like email addresses, names and addresses and passes it to BCRS so we can measure what local

support we have or contact donors and members. If you subscribed as a member or paid a donation offline, your information will be logged by BCRS to Golden Giving's platform.

Our Facebook and Twitter pages are also hosted by a third party, if you use those please refer to their privacy policies.

BRCS's website is hosted on the Wix.com platform. Your data may be stored through Wix.com's data storage, databases and the general Wix.com applications. They store your data on secure servers behind a firewall. Wix is certified under the EU-US Privacy Shield Framework and the Swiss-US privacy Shield Framework.

1. The data we collect about you

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

- **Identity Data** includes first name, maiden name, last name, username or similar identifier, marital status, title, date of birth and gender.
- **Contact Data** includes billing address, delivery address, email address and telephone numbers.
- Financial Data includes bank account and payment card details.
- **Transaction Data** includes details about payments to and from you and other details of products and services you have purchased from us.
- **Technical Data** includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, and other technology on the devices you use to access this website.
- **Profile Data** includes your username and password, purchases or orders made by you, your interests, preferences, feedback and survey responses.
- Usage Data includes information about how you use our website, products and services.
- **Marketing and Communications Data** includes your preferences in receiving marketing from us and our third parties and your communication preferences.

We also collect, use and share **Aggregated Data** such as statistical or demographic data for any purpose. Aggregated Data could be derived from your personal data but is not considered personal data in law as this data will **not** directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy policy.

We do not collect any **Special Categories of Personal Data** about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health, and genetic and biometric data). Nor do we collect any information about criminal convictions and offences.

If you fail to provide personal data

Where we need to collect personal data by law, or under the terms of a contract we have with you, and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with goods or services). In this case, we may have to cancel a product or service you have with us but we will notify you if this is the case at the time.

2. How is your personal data collected?

We use different methods to collect data from and about you including through:

- **Direct interactions.** You may give us your Identity, Contact and Financial Data by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:
 - apply for our products or services;
 - create an account on our website;
 - subscribe to our service or publications;
 - request marketing to be sent to you;
 - enter a competition, promotion or survey; or
 - give us feedback or contact us.
- Automated technologies or interactions. As you interact with our website, we will
 automatically collect Technical Data about your equipment, browsing actions and patterns. We
 collect this personal data by using cookies and other similar technologies. [We may also receive
 Technical Data about you if you visit other websites employing our cookies.] Please see our
 cookie policy [LINK] for further details.
- Third parties or publicly available sources. We will receive personal data about you from various third parties as set out below:
- Technical Data from the following parties:
 - (a) analytics providers such as Google based outside the EU;
 - (b) website provider Wix based outside the EU;
- Contact, Financial and Transaction Data from providers of technical, payment and delivery services such as GoldenGiving based inside the EU (pre-Brexit).
- Identity and Contact Data from data brokers or aggregators GoldenGiving.

3. How we use your personal data

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- To contact you and keep you updated on BCRS news.
- To calculate the number and geographic location of our membership and provide anonymized summaries of that to grant providers, government bodies and partners.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.

• Where we need to comply with a legal obligation.

Third-party marketing

We presently have no third party marketing arrangements. We will get your express opt-in consent before we share your personal data with any third party for marketing purposes. You can opt out at any time.

4. Data security

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

5. Data retention

How long will you use my personal data for?

We will only retain your personal data for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

In some circumstances you can ask us to delete your data.

In some circumstances we will anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes, in which case we may use this information indefinitely without further notice to you.