



**Thanet Countryside Trust**

# Privacy & Data Protection Policy

## **Who are we?**

We are Thanet Countryside Trust (TCT)

Monkton Nature Reserve is managed by the Thanet Countryside Trust, a registered, not-for-profit charity (No: 285972) established in 1982, which holds the Reserve in trust for the people of Thanet and East Kent.

### Premises Address:

Monkton Nature Reserve  
Canterbury Road  
Monkton  
Ramsgate  
Kent  
CT14 2LH

Tel: 01843 822 666    Email: [contact@nature-reserve.org](mailto:contact@nature-reserve.org)    Web site [www.monkton-reserve.org](http://www.monkton-reserve.org)

The TCT is committed to protecting and respecting your privacy and the following policy is a legal requirement under data protection legislation issued in May 2018 which aims to protect people's privacy further. The law applies to all public bodies, businesses and other organisations that process personal data. The legislation comprises the General Data Protection Regulation (GDPR) 25 May 2018 and the new Data Protection Act 2018 (DPA) 23 May 2018.

## **GDPR principles**

- TCT will process all personal data fairly and lawfully
- TCT will only process personal data for specified and lawful purposes
- TCT will endeavour to hold relevant and accurate personal data, and where practical, keep it up to date
- TCT will not keep personal data for longer than is necessary
- TCT will keep all personal data secure
- TCT will endeavour to ensure that personal data is not transferred to countries outside of the European Economic Area (EEA) without your knowledge or adequate protection.

# Information contained in this policy

This policy explains when and why we collect personal information, how we use it, how we keep it secure and the circumstances when it may be disclosed to others. The policy also explains your rights in relation to that personal information.

This policy is under regular review, and may change from time to time, so please check our web site to ensure this copy is the current published version.

1. Why do we collect personal information?
2. When do we collect personal information?
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## 1. Why do we collect personal information?

The TCT needs to request, record and process personal data so it can manage the following activities

- Membership, Staff, Volunteer and Trustee applications
- Employee HR and payroll
- Hold and promote events and activities for educational and social purposes
- Hold and promote events for fundraising and promotional purposes
- Manage bookings for use of the site, equipment and educational resources
- Submit and manage funding applications
- Financial accounting and expense claims
- Health and safety and security
- Contract with professional bodies for insurance, accountancy and legal services
- Register with regulatory bodies including, the Charity Commission, Local District Council and Information Commissioner

## 2. When do we collect personal information?

We manage a range of activities and collect personal information at different times and for various categories of people who engage with the TCT.

### This includes when individuals:

- enter TCT's external site and internal premises where CCTV cameras are operating
- apply to join as a member of the TCT
- become a member of the TCT
- apply to join as an authorised volunteer in any capacity, at the TCT
- become an authorised volunteer in any capacity, at the TCT
- apply to become an employed member of staff of the TCT
- become an employed member of staff of the TCT
- agree to become a contractor for the TCT
- you join or participate in, or any child for whom you are responsible joins or participates at any TCT events.
- you participate at the Reserve as an authorised instructor, mentor, supervisor, teacher or other appointment holder
- are an organiser for managing group visits.
- complete an accident or near miss reporting form for themselves or on behalf of another individual
- contact TCT in person, via telephone, letter or email
- use the TCT Website [www.monkon-reserve.org](http://www.monkon-reserve.org)
- use the TCT PayPal portal at the Reserve or online via our web site
- give consent for receiving email newsletters and updates
- use any TCT online materials or links
- Enter a competition, promotion or survey managed by the TCT
- undertake any work assessment or training, provided by TCT or via a training organisation
- ask TCT to provide verification of any of your relevant qualifications or experience or refer any person to TCT to obtain any such verification
- undertake and share a Disclosure and Barring Service (DBS) check when requested on TCT's behalf

### 3. What type of information do we collect?

#### **Common information we may request and or record includes:**

- Your name, address, e-mail address, phone number, date of birth, gender.
- CCTV images
- Photographs for staff and volunteer internal identification
- Details of any relevant medical conditions which may require reasonable adjustments to support your attendance at the Reserve
- Name, address, email address and phone number of your “In case of an emergency” contact
- details of any relevant training records and qualifications
- relevant details of dietary requirements
- details of your current occupation and employment history
- details of any relevant experience you may have
- health information including any health conditions or mental or physical impairments you may have which may impact on your role as a volunteer or member of staff
- details of unspent criminal records (Rehabilitation of Offenders Act 1974)

#### **Information which may be provided to us on your behalf or at your request, for example if:**

- any person makes a booking for any, facilities or other services on your behalf;
- you are a minor and your parent or legal guardian provides us with information about you on your behalf
- we take up references for you or seek verification from any referee you may have put forward.
- Information issued on a Disclosure and Barring Service (DBS) certificate

### 4. Why do we collect this information?

When we collect information from you directly we will explain the reason for collecting that information at the time of collection.

#### **To fulfil a contract with you;**

- to administer your membership and to provide membership information and membership benefits to you, to notify you about changes to membership benefits, products, facilities or services

- to provide you with any products and services that you request from us including: items purchased from us, event bookings, requests for information from our reference library.
- to keep you up to date with certain information when this is required because of a change in law or statutory regulations.
- to consider an application to join the TCT as a member, employee, volunteer, Trustee or in some other capacity, and to manage any such relationship

**When it is in our legitimate interests, and our interests are not overridden by your own interests;**

- to notify you of any changes or proposed changes in any laws, regulations or best practice in relation to the work or charitable objectives of the Trust
- to ask questions for the purposes of researching the use of our premises and services.
- to administer an awards programme, when you may not be aware of your nomination for such an award.
- to provide security and protection for individuals using CCTV cameras that only record images. CCTV will only be viewed when necessary (for example, to detect or prevent crime) and footage is stored for a set period, after which it is recorded over. Notices are displayed, to indicate where CCTV is used.
- to consider any complaints made to us about you, either in your capacity as a member, employee, volunteer, Trustee or in some other capacity.

**When we have obtained your consent to do so;**

- when you have opted in to receive email newsletters and other marketing materials
- When you have agreed to be a contact for an out of hours or lone working schedule.
- When you have agreed to be included on a TCT internal use only contact directory.

**When we have obtained your explicit consent to do so;**

- when dealing with ‘special categories’ of information such as medical data, driving licence or passport data or similar as defined by the General Data Protection Regulations.  
For instance, medical information gathered to support your participation in or supervision at an event, to hold a specific qualification, certification or licence, to confirm to TCT the use of an appropriately insured vehicle.

## 5. When do we share your information?

### **We may share your information with certain third parties including:**

- Appointed accountants and solicitors to undertake appropriate work on behalf of TCT
- Appointed body for managing TCT payroll and pension services
- The Disclosure and Barring Service.
- A mailing house; if contracted by TCT to forward TCT publications on its behalf.
- Inspectors, assessors, trainers and coaches who require the information to provide services which TCT have requested or to conduct any training or assessments which TCT have requested.
- Regulatory bodies and law enforcement agencies both in the UK and overseas (including countries outside of the EEA) when it is necessary to comply with our legal obligations
- prospective employers and any other persons you may refer to us for obtaining from us any references or verification of your qualifications or experience.
- credit reference agencies for assessing your credit score where this is a condition of us entering into a contract with you

### **We may also disclose your personal information to third parties:**

- if we are under a duty to disclose or share your personal information to comply with any legal or regulatory obligation, or to enforce or apply any contract or terms in force between you and us; or to protect the rights, property, or safety of TCT, our customers, members or others. This includes exchanging information with other companies and organisations for the purposes of security, law enforcement and fraud protection.
- if you ask, to provide any verification of your qualifications or experience or if you refer any person to us to obtain any verification of your qualifications or experience, we may use your information to provide the verification sought.
- we will only disclose as much information as is required for the third party to fulfil the function and where required to do so we will have a contract in place with third parties requiring them to keep your information secure and not to use it for their own purposes.

### **We may choose to publish certain information in the public domain or the press:**

- We may ask for your consent to use your image or certain personal information for publicity purposes.
- In certain limited situations it may be in our legitimate interests to publish certain personal details about you without asking for your consent.

Examples include publishing events, mentioning you by name in press releases or articles, publishing lists of staff or volunteer member's names. Before publishing such information, we will consider the potential impact publishing may have on you, and your rights, and ensure that these are not overridden by our own interests.

## **6. How long do we keep your information?**

We may keep and process your personal information for as long as necessary to fulfil the purposes we collected it for, or for as long it is necessary to do so for legal reasons.

We will review your personal information regularly to establish whether we are still entitled to process it. If we decide that we are not entitled to do so, we will stop processing your personal information to the extent that it is appropriate to do so and securely delete or anonymise it.

To determine the appropriate retention period, we will consider the amount, nature and sensitivity of that information, the potential risk of harm from unauthorised use or disclosure, and whether we can achieve the purposes for which we process that personal information through other means.

In some cases, you can ask us to delete the personal information we hold about you. Please see the section below titled your rights.

## **7. Where do we store your personal information?**

Your information will be held at our office address named on page 1 and on secure servers. We have in place reasonable technological measures, operational procedures and password protection on data files to safeguard your personal information from unauthorised access. Paper documents are kept in secure lockable cabinets. Access to any information is restricted to only those individuals who have an authorised and legitimate need. All such access must be approved by TCT Trustees who have the responsibility to ensure that the TCT's obligations covered by this policy are managed and met.

## **8. Transferring information outside of the EEA**

TCT has no requirement for personal details it holds to be transferred to countries outside of the European Economic Area (EEA). However, data that is transmitted via the internet or in email, cannot be 100% secure. As a global environment, transmitting data to and from us may take place outside the European Economic Area, for this we have no control.

## **9. Passwords and PINs**

Where we have authorised and provided an individual (or where they have chosen) a password or PIN which enables access to any TCT information technology equipment, software, apps, financial portals, websites, secured file sharing areas, office 365 subscriptions, CCTV systems, fire and security alarms; They are responsible for keeping that password or PIN confidential. We require them not to share passwords and PINs with anyone. This includes staff, volunteers and Trustees plus any contracted parties involved with repair and maintenance of TCT equipment and systems.

## 10. Your rights

### **You have the following rights in relation to the personal information we hold about you:**

- to access your personal information
- to be provided with information about how your personal information is processed
- to have your personal information corrected
- to have your personal information erased. Please be aware that erasing your personal information may prevent us from continuing to provide services to you.
- to object to or restrict how your personal information is processed
- to have your personal information transferred to yourself or to another business in certain circumstances
- You have the right to take any complaints about how we process your personal information to the Information Commissioner:  
<https://ico.org.uk/concerns/>  
Email [casework@ico.org.uk](mailto:casework@ico.org.uk)  
Tel: 0303 123 1113.