

Privacy Policy

This privacy policy sets out how Friends of the Ullswater Way uses and protects any information that you give Friends of the Ullswater Way. We are committed to ensuring that your privacy and personal details are protected. We will never sell your personal data. This policy explains what data we collect, how we may use it and how we keep it safe.

Any references to 'we' or 'us' refers to Friends of the Ullswater Way: 5, Grassthwaite Howe, Glenridding CA11 0PY Registered Charity Number 1185056.

Friends of the Ullswater Way may change this policy from time to time by updating this page.

Policy updated: March 2020

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1. What personal data we collect

Personal information is any data that can be used to identify you. We only collect, store and use it when we have a specified reason to do so. We will usually collect the following basic information about you from you directly if you are making a donation, booking events, registering as a volunteer or buying merchandise:

- name and title
- postal address
- telephone number so that we can call you if there are any administrative issues that need to be resolved
- bank account details for setting up a regular direct debit, if appropriate
- Gift Aid declaration
- employer details for processing a payroll gift
- photographs/video of event attendees

We may also collect, store and process information about your interactions with us. This might include the date, time, content and method of contact (including face to face meetings), details about donations you make to us, events or activities that you register for or attend, how you've helped us through volunteering or any request for support.

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

We sometimes receive personal data about individuals, such as volunteers, from third parties, for example when we partner with another organisation for volunteering

2. Sensitive personal data

We do not usually collect or store sensitive personal data such as information about your health, beliefs or politics but there are some exceptions to this.

If you work for us as a volunteer then we may collect additional information about you, including emergency contact details and information about medical conditions. We only hold health information which you have provided to us, unless you have an accident whilst volunteering for us, in which case we may collect additional sensitive personal data in the event of an insurance or legal claim.

3. How we use your personal information

We process personal information for certain legitimate business purposes, which means we have a genuine and legitimate reason for the processing, and we are not harming your rights and interests by doing so. Our legitimate interests include the following:

- where the processing enables us to enhance, modify, personalise or otherwise improve our services and communications to supporters to benefit our charitable objectives.
- to identify and prevent fraud.
- to enhance the security of our network and information systems.
- to better understand how people interact with our websites.
- to provide postal communications to you which we think will be of interest to you as someone who is supporting our objectives.
- to determine the effectiveness of our appeal campaigns, advertising and other promotions.
- to provide a personalised service to you when you visit our website.
- to ask you what you think of us
- using images for external marketing and publicity purposes via social media, our website, in presentations or printed materials.

We also use personal data for administrative purposes including:

- the processing of donations
- the fulfilment of orders for goods or services
- to respect your choices and preferences (e.g. if you ask not to receive marketing material, we will keep a record of this to ensure we respect your choice).

In some cases we may also process data to:

- comply with a legal duty
- help protect your health and wellbeing whilst you are volunteering with us.

We may carry out research and analysis on our supporters' data to help us better understand them, improve the relevance and effectiveness of our marketing, and provide a better service to supporters. This may include using demographic or other information to identify common characteristics, interests and preferences.

We may also occasionally use publicly available information about individuals, such as media reports or information on Companies House about business interests, or information available from internet searching, to inform our communications.

We may aggregate and anonymise personal data before we analyse it so that it can no longer be linked to an identifiable person.

We may occasionally send you information about the activities of third parties which we consider to be directly relevant to our charitable objectives.

4. Photographs and video

We often take images of multiple participants at our public events. It is our legitimate interest to do so for publicity purposes and as a record of our work. We will ensure that people participating in our group events are given advance notice of our intention to collect images and reminders on the day. They will have the right to object to our use of them.

In the event that we are taking specific, close-up images of individuals whose names may be included in our use of those images, we may secure and retain the individual's written consent, including by electronic communications.

If we are taking readily identifiable images of children, we will take extra care to ensure their privacy rights are respected. If under 16 years of age, we will secure written parental consent for the taking and use of the photograph or video. If 16 to 18 years of age, we secure consent from the child. Consent can be withdrawn at any time.

5. Marketing information by email

When providing us with email information via our website, you will be given the option to opt-in to receive marketing communications from us. Where you agree, we may send you occasional emails about volunteering, events, appeals, fundraising and other information relevant to our aims. You can object or unsubscribe to receiving marketing emails from us at any time. Please let us know by emailing us at info@ullswaterway.co.uk

6. Telephone

We do not make unsolicited marketing calls to numbers registered with the Telephone Preference Service or Corporate Telephone Preference Service without consent. You may receive other types of telephone calls from us which are administrative or in response to a request from you for information, such as regarding an order or volunteering or event booking.

7. Supporter profiling

We continually strive to improve our fundraising efforts so that they are as effective and efficient as possible. To do this, we may occasionally conduct research and analysis on our existing supporter data or on potential new supporters – this kind of activity is a legitimate interest. The types of data processing this may entail includes the following:

- Analysis of supporters by group, post code or particular area to ensure that any campaigns or mailings are sent to those who are most likely to be interested. This helps us to target our resources.
- We may collect career information, affinity to our cause, connections to our staff/Trustees/volunteers.

- We may research public records of an individual's trusteeships and previous gifts or donations made by an individual to charity or whether a company that the individual manages or is a director of has a corporate social responsibility (CSR) programme.
- We may research any key networks or organisations that the individual is publicly known to be a member of to check for affinity with our objectives.
- We aim to ensure that we only collect information from freely available public sources where an individual would have reasonable expectation that their information may be read by the public or has freely made information available in respect of their business and/or philanthropic interests.
- We seek to ensure that any research or profiling is done in a way that does not unreasonably or unexpectedly intrude on an individual's privacy.
- We also endeavour to make sure that individuals are made aware of the purposes for which we may collect and process their personal data at the earliest reasonable opportunity.
- We may produce short biographies of particular individuals that we are due to meet.
- We are required by the Charity Commission to check the sources of donations to avoid money laundering, fraud or other abuses. To comply with the standards required, we may carry out due diligence on anyone making a significant donation.
- We may also screen supporters if there is a risk of bringing the charity's reputation into disrepute by association.

If you do not want to have your personal data used for in our profiling activities please let us know at any time by emailing us at info@ullswaterway.co.uk

8. Retaining and storing your data

We are committed to ensuring that your information is secure. In order to prevent the loss, misuse or alteration of personal information under our control we have put in place physical, electronic and managerial procedures to safeguard and secure the information we hold. We store our data within the UK.

Duplication of data will be minimised and any personal information you supply to us will not be retained for longer than necessary. This is normally no more than seven years after your last financial contribution or other activity with us.

We may contact lapsed members or donors up to two years after their last contact with us.

We regularly review what information we hold and delete any that is no longer required.

9. Archiving

Where our work is of public interest we may archive it in order to secure the permanent availability of recorded memory, i.e. evidence and information in order to enable research, accountability, the discovery and availability of Friends of the Ullswater Way's identity, memory and history, the establishment of precedent decisions and educational use. We minimise the amount of personal data included in archives.

10. Sharing your data

We will never sell or rent your personal information to other organisations. We may occasionally share your data with third parties or individuals when obliged to by law, for purposes of national security, taxation, criminal investigations and the following:

- If we have asked you if we can do so and you have given consent
- When we use other companies to provide services on our behalf, e.g. mailing or delivering orders, when using auditors/ advisors or processing credit or debit cards payments.
- If we merge with another organisation to form a new entity, information may be transferred to the new entity
- If we run an event in partnership with another organisation we may need to share your details with that organisation. We will ensure that it is made clear to you what will happen to your data when you register for the event.
- We may share aggregated anonymised statistics about our supporters to potential partners, sponsors or other third parties that we trust but no individuals will be identifiable.

11. Your data rights

You have legal rights for the control of your data, which includes:

- the right for confirmation as to whether or not we hold your personal data
- the right to obtain a copy of the information we hold (called a Subject Access Request, see below).
- the right to have inaccurate data corrected
- the right to have your data erased, except where it is necessary for us to continue to use the data for a lawful reason.
- the right to object to our processing of your data for marketing or profiling
- the right to receive your data in a common electronic format where we hold it either on the basis of your consent or for the performance of a contract.

You can contact us at any time to access, change or update the details we hold on you. You have the right to obtain a copy of your record, known as a

Subject Access Request free of charge. However, we may charge a fee of £10 if a Request is manifestly unfounded or excessive, particularly if it is repetitive. We will need to ask you to confirm your identity.

If you want to find out more about the information we hold about you or what we do with it, please contact:

Ms Lindsey Houlding

Fell Foot, Askham, Penrith CA10 2PG

Email: info@ullswaterway.co.uk

We must provide you the information without delay and at the latest within one month of receipt.

We may extend the period of compliance by a further two months where requests are complex or numerous. If this is the case, we will inform you within one month of the receipt of the request and explain why the extension is necessary.

If you believe that any information we are holding on you is incorrect or incomplete, please write to or email us as soon as possible.

12. Children's data

Whilst children over the age of 13 can give their own consent to marketing, we have decided not to process the data of anyone under the age of 18 for marketing purposes, in order to best protect the privacy of children. We will not knowingly send marketing information to anyone under the age of 18.

If you are under 18 and want to donate or buy merchandise, please obtain your parent/guardian's permission before you provide any personal information to us and tell us your age.

On occasion, we may hold the data of children who are taking part in events. This may include health data as well as name, address and date of birth. In these circumstances, the data will need to have been provided by the parent or guardian. In all cases, children are required to be accompanied at our events by a responsible adult.

13. Links to other Websites

Our website may contain links to enable you to visit other websites of interest easily. However, once you have used these links to leave our site, you should note that we do not have any control over that other website. Therefore, we cannot be responsible for the protection and privacy of any information which you provide whilst visiting such sites and such sites are not governed by this privacy statement.

14. You do not need to disclose any personal information to simply browse our site.

15. Complaints

If you would like to make a complaint, please see our [Complaints Policy](#)