



Snowdonia Society Privacy Policy

The privacy and security of your personal information is extremely important to us. This privacy policy explains how and why we use your personal data, to make sure you stay informed and can be confident about giving us your information.

We'll keep this page updated to show you all the things we do with your personal data. This policy applies if you're a supporter of the Snowdonia Society (member, donor, volunteer, customer, employee) or use any of our services, visit our website, email, call or write to us.

We'll never sell your personal data and will only share it with organisations we work with when it's necessary and the privacy and security of your data is assured.

Who are 'we'?

In this policy, whenever you see the words 'we', 'us', 'our', 'Snowdonia Society', it refers to The Snowdonia Society.

The Snowdonia Society (Reg. Charity number 1155401) is a charitable organisation with the aim to look after Snowdonia.

If you have any questions in relation to this privacy policy or how we use your personal data they should be sent to info@snowdonia-society.org.uk or addressed to the Data Protection Co-ordinator, Snowdonia Society, Caban, Yr Hen Ysgol, Brynrefail, Caernarfon, Gwynedd, LL55 3NR.

What personal data do we collect?

Your personal data (any information which identifies you, or which can be identified as relating to you personally for example, name, address, phone number, email address) will be collected and used by us. We'll only collect the personal data that we need.

We collect personal data in connection with specific activities such as membership requests or registration to events, placing an order, donations, volunteering, conducting research, employment.

You can give us your personal data by filling in forms on our website, by registering to use our website, or other social media functions on our website, entering a competition, promotion or survey or by corresponding with us (by phone, email or by joining as a member/supporter/customer/volunteer).



This personal data you give us may include name, title, address, date of birth, age, gender, demographic information, email address, telephone numbers, personal description, photographs, attitudes and opinions).

Personal data provided by you

This includes information you give when interacting with us, for example joining or registering, placing an order or communicating with us. For example:

- Personal details (name, date of birth, email, address, telephone, and so on) when you join as a member or supporter
- Financial information (payment information such as credit or debit card or direct debit details, and whether donations are gift-aided)
- Your opinions and attitudes about the Snowdonia Society, activities and interests, and your experiences of the Snowdonia Society

If you buy membership as a gift your details will be recorded and your association with that relationship will be recorded.

We may automatically collect the following information:

- Technical information, including the Internet protocol (IP) address used to connect your computer to the Internet, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform.
- Information about your visit, including, but not limited to the full Uniform Resource Locators (URL) and query string, clickstream to, through and from our website (including date and time), products you viewed or searched for, page response times, download errors, length of visits to certain pages, page interaction information (such as but not limited to, scrolling, clicks, and mouse-overs), methods used to browse away from the page.
- Information about your purchases including but not limited to revenue figures, the types of products purchased, membership application ID, purchase ID.
- The terms that you use to search our website

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Personal data created by your involvement with us

Your activities and involvement with us 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'll keep records of when and how much you give to a particular cause.

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. The sections Research and Profiling gives more detail about how we use information for profiling and targeted advertising, including giving you more relevant digital content.

Volunteer

If you're a volunteer 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 or contractual reasons, to protect us (including in the event of an insurance or legal claim) and for safeguarding purposes.

How we use your personal data

We'll only use your personal data on relevant lawful grounds as permitted by the EU General Data Protection Regulation (from 25 May 2018)/UK Data Protection Act and Privacy of Electronic Communication Regulation.

Personal data provided to us will be used for the purpose or purposes outlined in any fair processing notice in a transparent manner at the time of collection or registration where appropriate, in accordance with any preferences you express. If asked by the police, or any other regulatory or government authority investigating suspected illegal activities, we may need to provide your personal data.

Your personal data may be collected and used to help us deliver our charitable activities, help us raise funds, or complete your order or request. Below are the main uses of your data which depend on the nature of our relationship with you and how you interact with our various services, websites and activities.

Marketing communications

Your privacy is important to us, so we'll always keep your details secure. We'd like to use your details to keep in touch about things that may matter to you.

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If you choose to hear from us we may send you monthly newsletters that may contain Snowdonia Society news, fundraising, campaigns, event and volunteering workday lists.

We'll only send these to you if you agree to receive them and we will never share your information with companies outside the Snowdonia Society for inclusion in their marketing. If you agree to receive marketing information from us you can change your mind at a later date.

However, if you tell us you don't want to receive marketing communications, then you may not hear about events or other work we do that may be of interest to you.

We may sometimes use third parties to capture some of our data on our behalf, but only where we are confident that the third party will treat your data securely, in accordance with our terms and inline with the requirements set out in the GDPR.

We'll always act upon your choice of how you want to receive communications (for example, by email, post or phone). However, there are some communications that we need to send. These are essential to fulfil our promises to you as a member, volunteer, donor or buyer of goods or services from the Society. Examples are:

- Transaction messaging, such as Direct Debit schedules, shop purchase confirmations.
- Membership-related mailings such as renewal reminders, Magazines and notice of our Annual General Meeting

Membership including newsletters and magazines

We use the personal data you provide as a member provide to service your membership. This includes sending your membership card renewal information to annual members by mail, sending magazines, events programme and information about our Annual General Meeting.

Fundraising, donations and legacy pledges

Where we have your permission, we may invite you to support vital conservation work by making a donation, getting involved in fundraising activities or leaving a gift in your will.

Occasionally, we may invite some supporters to attend special events to find out more about the ways in which donations and gifts in wills can make a difference to specific projects and to our cause. We'll also send you updates on the impact that you make by supporting us in this way, unless you tell us not to.



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If you make a donation, we'll use any personal information you give us to record the nature and amount of your gift, claim gift aid where you've told us you're eligible and thank you for your gift. If you interact or have a conversation with us, we'll note anything relevant and store this securely on our systems.

If you tell us you want to fundraise to support our cause, we'll use the personal information you give us to record your plans and contact you to support your fundraising efforts.

If you've told us that you're planning to, or thinking about, leaving us a gift in your will, we'll use the information you give us to keep a record of this – including the purpose of your gift, if you let us know this.

If we have a conversation or interaction with you (or with someone who contacts us in relation to your will, for example your solicitor), we'll note these interactions throughout your relationship with us, as this helps to ensure your gift is directed as you wanted.

Management of volunteers

We need to use your personal data to manage your volunteering, from the moment you enquire to the time you decide to stop volunteering with us. This could include: contacting you about a role you've applied for or we think you might be interested in, expense claims you've made, work days you've booked and to recognise your contribution.

We may also share this with funders to help them monitor how their funding is making a difference.

Retail sales

We process customer data in order to fulfil retail activities. Your data will be used to communicate with you throughout the process, including to confirm we've received your order and payment, to confirm dispatch, to clarify where we might need more detail to fulfil an order, or to resolve issues that might arise with your order.

Research

We carry out research with our supporters, customers, staff and volunteers to get feedback on their experience with us. We use this feedback to improve the experiences that we offer and ensure we know what is relevant and interesting to you.



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If you choose to take part in research, we'll tell you when you start what data we will collect, why and how we'll use it. All the research we conduct is optional and you can choose not to take part. For some of our research we may ask you to provide sensitive personal data (e.g. ethnicity). You don't have to provide this data and we also provide a 'prefer not to say' option. We only use it at an aggregate level for reporting (e.g. equal opportunities monitoring).

Recruitment and employment

In order to comply with our contractual, statutory, and management obligations and responsibilities, we process personal data, including 'sensitive' personal data, from job applicants and employees.

Such data can include, but isn't limited to, information relating to health, racial or ethnic origin, and criminal convictions. In certain circumstances, we may process personal data or sensitive personal data, without explicit consent. Further information on what data is collected and why it's processed is given below.

Contractual responsibilities: Our contractual responsibilities include those arising from the contract of employment. The data processed to meet contractual responsibilities includes, but is not limited to, data relating to: payroll, bank account, postal address, sick pay; leave, maternity pay, pension and emergency contacts.

Statutory responsibilities: Our statutory responsibilities are those imposed through law on the organisation as an employer. The data processed to meet statutory responsibilities includes, but is not limited to, data relating to: tax, national insurance, statutory sick pay, statutory maternity pay, family leave, work permits, equal opportunities monitoring.

Management responsibilities:

Our management responsibilities are those necessary for the organisational functioning of the organisation. The data processed to meet management responsibilities includes, but is not limited to, data relating to: recruitment and employment, training and development, absence, disciplinary matters, e-mail address and telephone number.

Sensitive personal data

The Act defines 'sensitive personal data' as information about racial or ethnic origin, political opinions, religious beliefs or other similar beliefs, trade union membership, physical or mental health, sexual life, and criminal allegations, proceedings or convictions.



In certain limited circumstances, we may legally collect and process sensitive personal data without requiring the explicit consent of an employee.

(a) We will process data about an employee's health where it is necessary, for example, to record absence from work due to sickness, to pay statutory sick pay, to make appropriate referrals to the Occupational Health Service, and to make any necessary arrangements or adjustments to the workplace in the case of disability. This processing will not normally happen without the employee's knowledge and, where necessary, consent.

(b) We will process data about, but not limited to, an employee's racial and ethnic origin, their sexual orientation or their religious beliefs only where they have volunteered such data and only for the purpose of monitoring and upholding our equal opportunities policies and related provisions.

(c) Data about an employee's criminal convictions will be held as necessary.

Disclosure of personal data to other bodies

In order to carry out our contractual and management responsibilities, we may, from time to time, need to share an employee's personal data with one or more third party supplier.

To meet the employment contract, we are required to transfer an employee's personal data to third parties, for example, to pension providers and HM Revenue & Customs and Payroll.

In order to fulfil our statutory responsibilities, we're required to give some of an employee's personal data to government departments or agencies e.g. provision of salary and tax data to HM Revenue & Customs.

Updating your data and marketing preferences

We want you to remain in control of your personal data. If, at any time, you want to update or amend your personal data or marketing preferences please contact us.

Your data protection rights (DPO)

Where the Snowdonia Society is using your personal data on the basis of consent, you have the right to withdraw that consent at any time. You also have the right to ask the Snowdonia Society to stop using your personal data for direct marketing purposes.



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Subject access rights

If you would like further information on your rights or wish to exercise them, please write to us at Data Protection Co-ordinator, Snowdonia Society, Caban, Yr Hen Ysgol, Brynrefail, Caernarfon, Gwynedd, LL55 3NR.

You will be asked to provide the following details:

- The personal information you want to access;
- Where it is likely to be held;
- The date range of the information you wish to access

We will also need you to provide information that will help us confirm your identity. If we hold personal information about you, we will give you a copy of the information in an understandable format together with an explanation of why we hold and use it.

Once we have all the information necessary to respond to your request we'll provide your information to you within one month. This timeframe may be extended by up to two months if your request is particularly complex.

What to do if you're not happy

In the first instance, please talk to us directly so we can resolve any problem or query. You also have the right to contact the Information Commissions Office (ICO) if you have any questions about Data Protection. You can contact them using their help line 0303 123 113 or at www.ico.org.uk.

Cookies and links to third party websites

Cookies

Cookies are small pieces of text sent by your web browser by a website you visit. A cookie file is stored in your web browser and allows the Service or a third-party to recognize you and make your next visit easier and the Service more useful to you.

Cookies can be "persistent" or "session" cookies. Persistent cookies remain on your personal computer or mobile device when you go offline, while session cookies are deleted as soon as you close your web browser.

Further information can be found in the [Snowdonia Society Cookie Policy \(Debbie needs to link once on website\)](#)

Links to other websites

Our website may, from time to time, contain links to and from the websites of our partner networks, business members and affiliates. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that

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we don't accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to these websites. This privacy policy applies solely to the personal data collected by the Snowdonia Society.

Keeping your information

We will only use and store your information for as long as it is required for the purposes it was collected for. How long it will be stored for depends on the information in question, what it is being used for and, sometimes, statutory legal requirements:

What data	Suggested retention period and why
<u>Current Membership</u> – name, address, email, phone number and payment details	10 years from end of membership – Financial HMRC /gift aid requirement is at least 6/7 years.
<u>Lapsed Membership</u> – name, address, and possibly email ,phone number and payment details	As above
<u>Supporters</u> – ad hoc donors - name, address, email, phone number and payment details	At least 6/7 years – HMRC /gift aid
<u>Staff records</u> - name, address, and possibly email, phone number, NI number, bank details; personnel files - training records and notes of disciplinary and grievance hearings. Pay records.	6 years from the end of employment (personnel, wages and salary records) - references and potential litigation. 3 years for Income Tax and NI returns – Financial regulations
<u>Volunteers</u> - name, address, and possibly email, phone number.	2 years – in case a reference is required, or a complaint or claim is made, background information may be required for both internal and or external investigation. New forms required if volunteers re-join.
<u>Job applicants</u> - name, address, email, phone and number, employment history etc.	3 months – in case of a discrimination claim, data would be required to defend the claim.

How we secure your data

Information system and data security is imperative to us to ensure that we are keeping our customers, members, volunteers and employees safe.

We operate a robust and thorough process for assessing, managing and protecting new and existing systems which ensures that they are up to date and secure against the ever changing threat landscape. In addition to this, we follow a defence in depth security model, which means that your data is protected by multiple layers of security.

When you trust us with your data we will always keep your information secure to maintain your confidentiality. By utilizing strong encryption when your information is stored or in transit we minimize the risk of unauthorized access or disclosure; when entering information on our website, you can check this by right clicking on the padlock icon in the address bar.



Disclosing and sharing information

When we allow third parties acting on behalf of the Snowdonia Society to access to your information, we will always have complete control of what they see, how long they see it for and what they are allowed to do with it.

We do not sell or share your personal information for other organisations to use.

Personal data collected and processed by us may be shared with the following groups where necessary:

- Snowdonia Society employees and trustees.
- Third party cloud hosting and IT infrastructure providers who host the website and provide IT support in respect of the website;
- Third party e-newsletter platform provider.

We may also disclose your personal information to third parties if we are under a duty to disclose or share your personal data in order to comply with any legal obligation, or in order to enforce or apply our terms of use or cookie policy and other agreements; or to protect the rights, property, or safety of The Snowdonia Society our members, supporters and visitors. This includes exchanging information with other companies and organisations for the purposes of fraud protection.

Storage of information

The Snowdonia Society operations are based in the UK and we store all of our data within the European Union (EU). Some of our systems are provided by US companies and whilst it is our policy that we prefer data hosting and processing to remain on EU-based solutions, it may be that using their products results in data transfer to the USA. However we only allow this when we certain it will be adequately protected. (e.g. US Privacy Shield or Standard EU contractual clauses).

Changes to this privacy policy

We'll amend this privacy policy from time to time to ensure it remains up to date and reflects how and why we use your personal data and new legal requirements. Please visit our website to keep up to date with any changes. The current version will always be posted on our website.

This privacy policy was last updated on 9th May 2018.