**Amended October 2024**

## 1. Introduction

This policy describes how and why A Rocha UK uses your personal information, how we protect your privacy when doing so, and your rights and choices regarding this information. We promise to respect any of your personal information which is under our control and to keep it safe. We aim to be clear when we collect your information about what we will do with it.

This policy was extensively updated in October 2024.

## 2. Who we are

A Rocha UK is a Christian nature conservation organisation doing practical nature conservation. We work in partnership with Churches, Christian land managers and individuals.

Our mission is to equip Christians and Churches to protect and restore the natural environment – for God, nature and all people.

A Rocha UK is a charity registered in England and Wales (1089276) and in Scotland (SC042147) and is a company limited by guarantee (4210929)

In data protection law, A Rocha UK is a Data Controller, ICO Registration Z9428900.

## 3. Our Privacy Policy in brief

It's important that you read the full policy to understand what information we hold, how we may use it, and what your rights are – but if you don't have time to read it all now, here's a quick summary:

- We only collect the personal information that we need. Personal information is any information that can be used to identify you.
- We collect information that you give us *directly* (eg when you make a donation); information from *your use of the A Rocha UK website,* information that we get as a result of your *giving to A Rocha UK through other organisations* (eg Just Giving)
- We may collect information *from public sources* (including information that can be accessed through search engines like Google.)
- We do not collect sensitive data (eg medical data) unless there is a clear reason to.
- We use your information for a variety of purposes. Some of the most common ones include: keeping you up-to-date with our latest news; asking for financial support; processing donations; and dealing with queries.
- We may use publicly available information to research our supporters so that we can be well informed when we meet you. We may also use wealth screening, a process which uses a trusted third-party partner to screen your name and address against databases built up from publicly available information. You can opt out of these processes.

- We never sell your data to other organisations or allow them to use data for their own purposes. We do share information with organisations who deliver services to us (eg payment processing). We also share information where we are legally obliged to do so.
- We use a variety of legal bases of processing. We make extensive use of legitimate interests (and will now use this as our legal basis for direct marketing postal communications for new supporters).
- We do our best to keep your data safe and secure.
- We only store data for as long as necessary for the things we need to do
- You have many individual rights over your data and we respect these at all times

## 4. How we collect information about you

We collect information in the following ways:

- **Information that you give us directly:** We collect this information in connection with specific activities, for example, when you use our websites or printed forms or telephone our offices to:
    - make a donation to us;
    - register for an event;
    - create an account on one of our websites;
    - engage with our social media;
    - sign up for our email newsletters;
    - complete a survey, questionnaire or feedback form;
    - or otherwise provide us with personal information.
- **Information that you give us indirectly:** Your information may be shared with us by fundraising sites like JustGiving. These independent third parties will only do so when you have indicated that you wish to support A Rocha UK and with your consent. You should check their privacy policy when you provide your information to understand fully how they will process your data.
- **Information that we collect from your use of our websites:** Website usage information is collected using cookies. This helps us to see how many people use our websites, how many people visit on a regular basis, and how popular individual pages are. Cookies are also essential to our websites running correctly and delivering goods and services to users. For more information, please see our cookies policy.
- **Information from public sources:** We may combine information you provide to us with information available from public sources in order to gain a better understanding of our supporters and those who engage with us. Such information may be found in places such as Companies House and information that has been published online and in print (see Section 6 sub-section on “Building profiles of supporters and potential supporters”).

## 5. What personal information we collect

We will only ever collect the information we need – including data to help improve our services – or which you agree we can collect.

Personal data is any information that can be used to identify you. For example, it can include information such as your name, email address, postal address, telephone number, mobile telephone number, bank account details, credit/debit card details, and whether you are a taxpayer

so that we can claim Gift Aid on any donations you may make. It does not include data where the identity has been removed (anonymous data).

We collect, store and use the following kinds of personal information:

- your name;
- your contact details (including postal address, telephone number, e-mail address and/or social media identity);
- your date of birth;
- your gender;
- your bank where you provide these to set up a standing order;
- if you volunteer for us or apply for a job with us, information necessary for us to process these applications and assess your suitability;
- information about your activities on our website(s) or social media platforms when you interact with us, and about the device you use to access these, for instance your IP address and geographical location;
- information as to whether you are a taxpayer to enable us to claim Gift Aid;
- any other personal information you provide to us.

**Sensitive/special categories of data**

Data Protection law recognises that certain categories of personal information are more sensitive. This is known as sensitive personal data or special categories of data and covers health information, race and ethnicity, religious or philosophical beliefs and political opinions amongst other things.

We do not collect sensitive personal information about you unless there is a clear reason for doing so, such as in the event of an accident at one of our reserves or events, we may request information about any health conditions to facilitate appropriate medical care; or, in the case of those participating in the Eco Church scheme, we necessarily require information on church membership. When we collect this information, we will make it clear to you what we are collecting and why and what are our legitimate interests or other legal grounds for processing this information.

**Under 18s**

If you are aged 18 or under and would like to participate in an event, make a donation or get involved with us, please make sure that you have your parent or guardian's permission before giving us your personal information. When we collect information about a child or young person, we will make it clear why we are collecting this information and how it will be used.

## 6. How we use your personal information

We use personal information for a variety of purposes. These include:

- providing you with information and resources;
- inviting you to support our work as a charity;

- administering your donations, including processing Gift Aid;
- keeping a record of your relationship with us;
- responding to or fulfil any requests, complaints or queries you make to us;
- managing our events (eg Act for Nature days);
- checking for updated contact details against third party sources so that we can stay in touch if you move (see Section 10 “Keeping your information up to date”);
- sending you correspondence and communicate with you, using post, e-mail and telephone and via social media platforms
- administering our websites and monitoring their use;
- display content to you in a way appropriate to the device you are using (for example if you are viewing content on a mobile device or a computer);
- identifying potential supporters and donors;
- processing your application for a job or volunteering position;
- meeting our legal obligations, for instance to administer Gift Aid with HMRC;
- carry out fraud prevention and money laundering checks.

**Building profiles of supporters and potential supporters**

We are conscious of the need to steward our resources effectively for maximum kingdom impact.

We want to make our fundraising as effective as we can. That means being relevant to all our supporters and tailoring any financial requests we make of you to reflect your specific interests in A Rocha’s mission. It also means trying to find new supporters who are likely to be interested in our work, are philanthropic and have capacity to give. This may include people connected to our current major supporters, trustees or other lead volunteers.

The ultimate aim is to help us understand more about you as an individual so we can focus conversations we have with you about fundraising in the most personally relevant way, and ensure that we provide you with an experience as a donor or potential donor which is appropriate for you.

To help us, we undertake research using publicly available sources such as Companies House, social networks such as LinkedIn and web searches.

From time to time, we may also undertake wealth screening using specialist agencies such as Prospecting for Gold to gather information about you from publicly available sources, for example, Companies House, the Electoral Register, company websites, ‘rich lists’, social networks such as Linkedin, political and property registers and news archives.

If you would prefer us not to use your data in this way, please email us at uk@arocha.uk or call us on 020 8574 5935.

**Links to other websites**

Our websites may include links to third-party websites. We sometimes choose to participate in social networking sites such as Facebook.

Clicking on those links or enabling those connections may allow third parties to collect information about you. We do not control these third-party websites or how they use personal data. You should make sure you understand these websites' privacy policy as well as our own.

**Sharing your information**

A Rocha UK does not sell your information to other organisations. Neither does it share any information about you to other organisations for their own marketing purposes.

A Rocha UK may disclose your personal information in the following circumstances:

- To third parties who provide a service to us and are our data processors. Examples include sending out mailings and emails, analysing data (including wealth screening), and processing card payments. These data processors have access to personal information needed to perform their functions, but may not use it for other purposes. We require these third parties to comply strictly with our instructions and data protection laws and will make sure that appropriate controls are in place.
- Where we are under a duty to disclose your personal information in order to comply with any legal obligation.

## 7. Our legal basis for processing

Data protection laws mean that each use of personal information must have a legal basis for processing. There are a variety of legal bases set out in the UK data protection legislation.

The legal bases for processing that A Rocha UK uses vary depending on the purpose of the activity being undertaken.

**Specific consent**

Consent is where we ask you if we can use your information in a certain way and you agree to this, for example any marketing e-mails we send. The term "marketing" is broadly defined and covers news and information about our charity, our campaigns and our conservation work done by our various programmes.

Our postal marketing mailings have used specific consent. For all those who became supporters up until October 2024, this will remain the case.

Where we use your information based on consent, you have the right to withdraw consent for any future use of your information for this purpose at any time. For example, in all our e-mail marketing there is always an opportunity to unsubscribe.

**Legitimate interests**

In relying on legitimate interest, we make an assessment of any potential impact on you, how intrusive it is from a privacy perspective, and we balance these against A Rocha UK's interests in using your information in this way.

We rely on legitimate interests for a variety of purposes. These include:

- marketing postal mailings for all new supporters from October 2024;
- sending out our “Root and Branch” magazine which is provided as a benefit to our donors and supporting churches;
- thanking supporters (either by mail, e-mail or phone) for their gifts;
- analysing and profiling our supporters or potential supporters (see Section 6 on “how we use your personal information” for more detail);
- updating your address using third party sources if you have moved house (see Section 10 on “how we keep your information up to date” for more detail);

**Legal obligation**

We use this as a basis for processing personal information where we need to do so to comply with one of our legal or regulatory obligations, for example our Gift Aid returns to HMRC.

**Performance of a contract**

We would use this if you are buying something from us or applying to work /volunteer with us.

**Vital interests**

This would be our legal basis where it is necessary to protect life or health. For instance if there were to be an emergency impacting an individual at one of our events, or at either our Wolf Fields or Foxearth Meadows Nature Reserves which required us to contact people unexpectedly or share their information with the emergency services.

**Volunteer or employed member of staff**

If you are a volunteer or employed member of staff, additional circumstances may apply. Please see additional information on data protection in the staff and volunteer handbook.

## 8. How we keep your information safe

We ensure that there are appropriate technical and organisational controls in place to protect your personal details. For example, only authorised and password-protected user accounts have access.

Sensitive personal data on paper documents, such as that relating to staff-employment or to Gift-Aid donations, is kept in a secure physical environment, with physical access restricted to specific people for specific purposes.

At such time as A Rocha UK accepts payments over the telephone and using a credit or debit-card, payments will be taken in full compliance with PCI-DSS standards. No record will be kept of your card details. All transactional data will be encrypted during transmission to and from the payment-system.

Some of our suppliers run their operations outside the United Kingdom, including within the European Economic Area (EEA). This includes countries which do not have the same data protection laws as in the UK. In these circumstances, we will make sure they provide an adequate

level of protection in accordance with UK data protection law, and confirm that appropriate safeguards are in place.

## 9. How long we keep your information for

We will hold your personal information on our systems for as long as is needed to fulfil the function for which we hold the data or as long as is required by law for the relevant activity. For example, HMRC requires us to keep a record of donations, Gift Aid and financial transactions for seven years.

If you request that we stop sending you direct marketing materials, we will keep a record of your contact details and appropriate information to enable us to comply with your request not to be contacted by us.

## 10. How we keep your information up to date

We may use information from external sources such as the post office national change of address database to identify when we think you have changed address so that we can update our records and stay in touch. We only use sources where we are confident that you've been informed of how your information may be shared and used.

We do this so we can continue to contact you where you have chosen to receive marketing messages from us and contact you if we need to assist you with problems with donations.

We're committed to putting you in control of your data and you're free at any time to opt out from this activity. To find out more, please contact us by e-mail at uk@arocha.org or by phone at 020 85745935.

We really appreciate it if you let us know if your contact details change

## 11. Your rights

Under UK data protection law, you have rights over personal information that we hold about you. We've summarised these below:

- **Right to access your personal information:** You have a right to request access to the personal data that we hold about you. You also have the right to request a copy of the information we hold about you, and we will provide you with this unless legal exceptions apply. If you want to access your information, send a description of the information you want to see by post to A Rocha UK, 80 Windmill Road, Brentford, TW8 0QH or by email to uk@arocha.org
- **Right to have your inaccurate personal information corrected:** You have the right to have inaccurate or incomplete information we hold about you corrected. If you believe the information we hold about you is inaccurate or incomplete, please provide us with details and we will investigate and, where applicable, correct any inaccuracies.
- **Right to restrict use of your personal information:** You have a right to ask us to restrict the processing of some or all of your personal information in the following situations: (i) if some information we hold on you isn't right; (ii) you believe your privacy rights outweigh our legitimate interests to use your information for a particular purpose and you have objected to us doing so.
- **Right to erasure of your personal information:** You may ask us to delete some or all of your personal information and in certain cases, and subject to certain exceptions, you have

the right for this to be done. If we are unable to delete your information, we will explain why this is the case.

- **Right for your personal information to be portable:** If we are processing your personal information by automated means, you may, in some circumstances, ask us to provide it to you or another service provider in a machine-readable format.
- **Right to object to the use of your personal information:** (i) If we are processing your personal information based on our legitimate interests you have a right to object to our use of your information; (ii) if we are processing your personal information for direct marketing purposes, and you wish to object, we will stop processing your information for these purposes as soon as reasonably possible.

If you want to exercise any of the above rights, please contact us by post at A Rocha UK, 80 Windmill Road, Brentford, TW8 0QH or by email to uk@arocha.org. We may be required to ask for further information and/or evidence of identity.

We will endeavour to respond fully to all requests within one month of receipt of your request, however if we are unable to do so we will contact you with reasons for the delay.

## 12. Complaints

Should you feel we have not done our best to address any concerns you may have, you can complain to us directly,

- by email, at uk@arocha.org,
- by phone, at 020 8574 5935, or
- by post, to A Rocha UK, 80 Windmill Road, Brentford, TW8 0QH

If, after making such a complaint to us, 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 UK Information Commissioner's Office which regulates and enforces data protection law in the UK. Details of how to do this can be found at www.ico.org.uk or by using their Helpline number, 0303 123 1113.

## 13. Changes to this policy

This policy was updated in October 2024. We may change this Privacy Policy from time to time. If we make any significant changes in the way we treat your personal information we will make this clear on the A Rocha UK website or by contacting you via our regular e-mails.