

**Kingfishers Bridge Nature Reserve and  
Kingfishers Bridge Wetland Creation Trust  
Data Protection Privacy Notice**

## **1. INTRODUCTION**

AC RC and PC Green Farming (the owners of The Kingfishers Bridge Nature Reserve) is committed to protecting your privacy and security. This policy explains how and why we use your personal data, to ensure you remain informed and in control of your information.

The General Data Protection Regulation and the UK Data Protection Act 2018 have changed the rules which govern how we can communicate with you. As a result, we chose to rely on you giving us your consent about how we can contact you in connection to marketing. Today we remain fully committed to this approach which gives you the opportunity to choose whether you want to receive communications from us and select how you want to receive them (email, phone, SMS or post). We may use other lawful grounds for processing your personal data, depending on the relationship we have with you (please see **Section 4 on How We Use Your Information**).

You can decide not to receive communications or change how we contact you at any time. If you wish to do so please contact admin by emailing [admin@kingfishersbridge.org](mailto:admin@kingfishersbridge.org), writing to The Warden's Office, Kingfishers Bridge Nature reserve, 36A Stretham Road, Wicken, Ely, Cambs, CB7 5XL or by Phone: 07842782177

We will **never** sell your personal data.

### **Questions?**

Any questions you have in relation to this policy or how we use your personal data should be sent to our Data Protection officer Claire Riseborough, [claire@ceras.uk](mailto:claire@ceras.uk) or addressed to The Data Protection Officer, Warden's Office, Kingfishers Bridge Nature reserve, 36A Stretham Road, Wicken, Ely, Cambs, CB7 5XL

## **2. ABOUT US**

Your personal data (i.e. any information which identifies you, or which can be identified as relating to you personally) will be collected and used by the The Kingfishers Bridge Wetland Creation Trust, Reg Charity Number 1078882 and AC RC and PC Green Farming trading as The Kingfishers Bridge Nature Reserve (together referred to as The Kingfishers Bridge Nature Reserve) are based at The Kingfishers Bridge Nature Reserve. For the purposes of data protection law, AC, RC and PC Green Farming will be the controller.

## **3. WHAT INFORMATION WE COLLECT**

### **Personal data you provide**

We collect data you provide to us. This includes information you give when joining or registering, placing an order or communicating with us. For example:

- personal details (name, date of birth, email, address, telephone etc.) when you join as a member or supporter or apply for a job or to volunteer with us;
- financial information (payment information such as credit/debit card or direct debit details, and whether donations are gift-aided. Please see section 9 for more information on payment security); and
- details of your interests and preferences (such as campaigns, the ways you support us or types of wildlife you enjoy).

If you purchase Kingfishers Bridge Supporters Registration as a gift for someone, join as a family or are the parent of one of our youth supporters, your details will be recorded (as will the recipients) and your relationship to that person will be recorded.

### **Information created by your involvement with The Kingfisher Bridge Nature Reserve**

Your activities and involvement with Kingfishers Bridge 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, as well as when you engage in our social media or digital advertising.

If you decide to donate to The Kingfishers Bridge Wetland Creation Trust then we will 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. **Section 7 (Research and profiling)** contains more information about how we use information for profiling and targeted advertising.

We may generate personal data regarding possible wildlife crime.

### **Information from third parties**

We sometimes receive personal data about individuals from third parties (more information can be found under **Section 7 – Research and Profiling** below). For example, if we are partnering with another organisation (e.g. you provide your information to another charity we're collaborating with on a conservation project). Also, as explained in **Section 12 (Cookies and links to other sites)**, we may use third parties to help us conduct research and analysis on personal data (and this can result in new personal data being created).

Occasionally, we may collect information about certain supporters (e.g. particularly well known or influential people) from public sources. This could include public databases (such as Companies House), news or other media. We don't do this to everyone, and it is the exception not the rule.

### **Sensitive personal data**

We do not normally collect or store sensitive personal data (such as information relating to health, beliefs or political affiliation) about supporters and members. However, there are some situations where this will occur (e.g. if you volunteer with us, if you have an accident on our reserve or indicate that you wish to leave us a legacy). If this does occur, we'll take extra care to ensure your privacy rights are protected.

### **Accidents or incidents**

If an accident or incident occurs on our property, at one of our events or involving one of our staff (including volunteers) then we'll keep a record of this (which may include personal data and sensitive personal data).

## **Volunteer**

If you are a volunteer (whether for The Kingfishers Bridge Nature Reserve, or if you are helping us for other reasons - for example you work for another organisation which is running an event with us) 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 reasons, to protect us (including in the event of an insurance or legal claim) and for safeguarding purposes. You may also receive communications from us providing you with information about your duties as a volunteer, including your local group duties.

## **4. HOW WE USE INFORMATION**

We only ever use your personal data with your consent, or where it is necessary in order to:

- enter into, or perform, a contract with you;
- comply with a legal duty;
- protect your vital interests;
- for our own (or a third party's) lawful interests, provided your rights don't override these.

In any event, we'll only use your information for the purpose or purposes it was collected for (or else for closely related purposes):

### **Marketing**

We use personal data to communicate with people, to promote Kingfishers Bridge and to help with fundraising. This includes keeping you up to date with our news, updates, campaigns and fundraising information. For further information on this please see **Section 6 (Marketing)**.

### **Administration**

We use personal data for administrative purposes (i.e. to carry on our charity and conservation work). This includes:

- receiving donations (e.g. direct debits or gift-aid instructions) or administering legacy gifts;
- maintaining databases of our volunteers, members and supporters (including those who have indicated they wish to leave us a legacy);
- performing our obligations under membership contracts or in accordance with the law;
- fulfilling orders for goods or services (whether placed online, over the phone or in person);
- helping us respect your choices and preferences (e.g. if you ask not to receive marketing material, we'll keep a record of this).

### **Internal research and analysis**

We carry out research and analysis on our supporters, donors and volunteers, to determine the success of campaigns and appeals, better understand behaviour and responses and identify patterns and trends. This helps inform our approach towards campaigning and make Kingfishers Bridge a stronger and more effective organisation. Understanding our supporters, their interests and what they care about also helps us provide a better experience (e.g. through more relevant communications).

### **Supporter research and profiling**

We evaluate, categorise and profile personal data in order to tailor materials, services and communications (including targeted advertising) and prevent unwanted material from filling up your inbox. This also helps us understand our supporters, improve our organisation and carry out

research. Further information on profiling can be found in **Section 7 (Research and profiling)**.

We may process personal data for certain legitimate business purposes, which include some or all of the following:

- where the processing enables us to enhance, modify, personalise or otherwise improve our activities / communications in furtherance of our charitable objectives, for example to improve the experience of young people of learning about saving nature through their engagement with our website and usage of social media;
- to engage with third parties, whether to advance The Kingfishers Bridge Wetland Creation Trust charitable objectives, [for example, by helping to put nature at the heart of farming or in acting on feedback about our reserves or the general enquiries we receive], or otherwise to support our work [for example, in dealing with individual representatives at a governmental and international level to campaign to save nature, or in applying for grant funding (by ourselves and/or together with others), or with those who represent our corporate partners and business contacts];
- to ensure our compliance with best practice, for example with fundraising standards, by monitoring calls made by third parties on our behalf;
- to identify and prevent fraud; and
- to enhance the security of our network and information systems.

Whenever we process data for these purposes, we will ensure that we always keep your personal data rights in high regard and take account of these rights at all times.

When we process your personal data for our legitimate interests, we will make sure that we consider and balance any potential impact on you (both positive and negative), and your rights under data protection laws. Our legitimate business interests do not automatically override your interests – we will not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law).

You have the right to object to this processing if you wish, and if you wish to do so, then please contact [claire@ceras.uk](mailto:claire@ceras.uk). Please bear in mind that if you object this may affect our ability to carry out tasks above for your benefit.

## **5. DISCLOSING AND SHARING DATA**

We will **never** sell your personal data. If you have opted-in to marketing, we may contact you with information about our partners, or third party products and services, but these communications will always come from Kingfishers Bridge and are usually incorporated into our own marketing materials (e.g. advertisements in magazines or newsletters).

We may share personal data with subcontractors or suppliers who provide us with services. For example, if you order something from the Kingfishers Bridge Nature Reserve Shop, your name and address will be shared with the delivery company. However, these activities will be carried out under a contract which imposes strict requirements on our supplier to keep your information confidential and secure.

Occasionally, where we partner with other organisations, we may also share information with them (for example, if you register to attend an event being jointly organised by us and another organisation). We'll only share information when necessary and we'll make sure to notify you first.

## 6. MARKETING

The Kingfishers Bridge Nature Reserve asks its supporters to “opt-in” for most communications. This includes all our marketing communications (the term “marketing” is broadly defined and, for instance, covers information about conservation and the Kingfishers Bridge Nature Reserve).

This means you have the choice as to whether you want to receive these messages and are able to select how you want to receive them (post, phone, email, text).

You can decide not to receive communications or change how we contact you at any time. If you wish to do so please contact admin by emailing [admin@kingfishersbridge.org](mailto:admin@kingfishersbridge.org), writing to The Warden’s Office, Kingfishers Bridge Nature reserve, 36A Stretham Road, Wicken, Ely, Cambs, CB7 5XL or by Phone: 07842782177

What does ‘marketing’ mean?

Marketing does not just mean offering things for sale, but also includes news and information about:

- our charity, campaigns and conservation work;
- our role in educating the public in conservation of the natural environment;
- Kingfishers Bridge benefits and offers;
- volunteering opportunities and how you can help save nature;
- appeals and fundraising (including donations and also competitions, raffles etc.);
- our events and activities;
- products, services and offers (our own, and those of third parties which may interest you);
- leaving a legacy;
- taking part in projects; and
- ideas for giving nature a home in your garden.

When you receive a communication, we may collect information about how you respond to or interact with that communication, and this may affect how we communicate with you in future.

Newsletters and magazines

The Supporters Newsletter, are provided as a benefit to our Supporters. We send these out to all our Supporters (unless you specifically ask us not to) and you can choose to unsubscribe from general marketing communications without giving up your subscription to The Supporters Newsletter.

If you are a volunteer, we will still be communicating with you about your duties, including your local group duties, even if you choose not to receive general marketing from us.

### **Fundraising**

As a charity, The Kingfishers Bridge Wetland Creation Trust relies on donations and support from others to continue our conservation work. From time to time, we will contact supporters with fundraising material and communications. This might be about an appeal, a competition we’re running, or to suggest ways you can raise funds (e.g. a sponsored event or activity, or even buying a product if Kingfishers Bridge will receive some of the proceeds).

As with other marketing communications, we'll only contact you specifically about fundraising if you've opted into to receiving marketing from us (and you can, of course, unsubscribe at any time).

## **7. RESEARCH AND PROFILING**

This section explains how and why we use personal data to undertake research and build profiles which enable us to understand our supporters, improve our relationship with them, and provide a better supporter experience.

Profiling to help us understand our supporters

Profiling is gathering information about individuals or groups of individuals and understanding their characteristics or behaviours to learn more about their interests or likely behaviour.

We profile supporters in terms of financial, political and practical support. For example, we keep track of the amount, frequency and value of each person's support. This information helps us to ensure communications are relevant and timely and improve the experience our supporters receive. It also helps us identify individuals or groups of individuals who might be willing to provide more support in our conservation activities and we may contact them to see if they wish to do so.

We combine information about supporters with external information. The information is from a variety of sources including publicly available data such as the UK Census and the Land Registry or derived from surveys and questionnaires held on private databases. We do this to enhance and fill in any gaps so that we can understand our supporters better and send the most relevant communications and target our resources effectively. Examples of the external information we'll use includes socio demographic data based on postcode to improve understanding of different types of people and communities across the UK. We also use lifestyle and affluence information which includes information about your financial status, what other charities you may support, your shopping habits and your interests. A lot of the external data we use is aggregated or anonymised which means that it cannot be used to identify an individual. Although publicly available registers are used to collect data, this is done in accordance with the GDPR requirements.

On occasion, we may also combine information about particular supporters with external information (such as directorships listed on Companies House, professional profiles, search engine and public social media results; resources such as the Charity Commission, third-party publications or news about an individual which has featured in the media) in order to create a more detailed profile about a particular individual. We don't do this for everyone, and it is the exception not the rule. You can opt out of having your personal information profiled in this way by contacting us (see Section 1).

We sometimes collect information on preferences and interests (e.g. whether you are a bird enthusiast or a nature enthusiast) so that we know what communications you are mostly likely to be interested in.

### **Analysis, grouping and segmentation**

We analyse our supporters to identify shared characteristics and preferences. We do this by assessing various types of information including behaviour (e.g. previous responses) or demographic information (e.g. age or location) or lifestyle information (e.g. your interests and your affluence)

By grouping people together on the basis of common characteristics, we can ensure that groups are provided with communications, products, and information which is most important to them. This

helps prevent your inbox from filling up, and means we aren't wasting resources on contacting people with information which isn't relevant to them.

#### Anonymised data

We may aggregate and anonymise personal data so that it can no longer be linked to any particular person. This information can be used for a variety of purposes, such as recruiting new supporters, or to identify trends or patterns within our existing supporter base. This information helps inform our actions and improve our campaigns, products/services and materials.

## 8. YOUNG PEOPLE

### Photographs, pictures, stories and competitions in our Newsletter

We want young people to join in saving nature, and there may be opportunities in our youth Newsletter for readers to share their photos, stories and pictures. If we publish your child's picture, photo or story, we may include their first name and age with it. If they write an article or story for us, we might also include their surname alongside it.

If your child enters a competition and is one of the lucky winners or runners-up, we'll publish their name and winning entry alongside the other winners.

**Parental permission:** If your child is under 18 then we'll need permission from you as their parent or guardian for them to enter one of our competitions or to share a picture, photo or story with us.

### Information for parents

We take great care to protect and respect the rights of individuals in relation to their personal data, especially in the case of children. If your child is under 18, we'll only use his or her personal data with your consent. This means that, for example, if your child wants to have his or her name or picture featured in one of our youth magazines, we'll need you to confirm you're happy for us to do so.

### Marketing and fundraising

We won't send marketing emails, letters, calls or messages to under 18 year-olds and, in order to donate to Kingfishers Bridge or order things from us online, you need to be an adult.

Our youth Newsletter sometimes include competitions or ideas about how to raise money (e.g. sponsored activities), but they are mostly just about wildlife and conservation, the Kingfishers Bridge Nature Reserve, and ideas for things to do.

We won't use young people's personal data for marketing purposes and we won't profile it.

## 9. HOW WE PROTECT DATA

We employ a variety of physical and technical measures to keep your data safe and to prevent unauthorised access to, or use or disclosure of your personal information.

Electronic data and databases are stored on secure computer systems and we control who has access to information (using both physical and electronic means). Our staff receive data protection training and we have a set of detailed data protection procedures which personnel are required to follow when handling personal data.

#### Payment security

All electronic Kingfishers Bridge forms that request financial data will use the Secure Sockets Layer (SSL) protocol to encrypt the data between your browser and our servers.

If you use a credit card to donate, purchase a Supporters Registration or purchase something on-line we will pass your credit card details securely to our payment provider (PayPal). Kingfishers Bridge complies with the payment card industry data security standard (PCI-DSS) published by the PCI Security Standards Council, and will never store card details.

Of course, we cannot guarantee the security of your home computer or the internet, and any online communications (e.g. information provided by email or our website) are at the user's own risk.

#### CCTV

Some of our premises have CCTV and you may be recorded when you visit them. CCTV is there to help provide security and to protect both you and the Kingfishers Bridge Nature Reserve. CCTV will only be viewed when necessary (e.g. to detect or prevent crime) and footage is only stored temporarily. Unless it is flagged for review CCTV will be recorded over.

The Kingfishers Bridge Nature Reserve complies with the Information Commissioner's Office CCTV Code of Practice, and we put up notices so you know when CCTV is in use.

## **10. STORAGE**

#### Where we store information

Kingfishers Bridge's operations are based in the UK and we store our data within the European Union. Some organisations which provide services to us may transfer personal data outside of the EEA, but we'll only allow them to do if your data is adequately protected.

For example, some of our systems use Microsoft products. As a US company, it may be that using their products result in personal data being transferred to or accessible from the US. However, we'll allow this as we are certain personal data will still be adequately protected (as Microsoft is certified under the USA's Privacy Shield scheme).

#### How long we store information



We will only use and store information for so long as it is required for the purposes it was collected for. How long information will be stored for depends on the information in question and what it is being used for. For example, if you ask us not to send you marketing emails, we will stop storing your emails for marketing purposes (though we'll keep a record of your preference not to be emailed).

We continually review what information we hold and delete what is no longer required. We never store payment card information.

## **11. KEEPING YOU IN CONTROL**

We want to ensure you remain in control of your personal data. Part of this is making sure you understand your legal rights, which are as follows:

- the right to confirmation as to whether or not we have your personal data and, if we do, to obtain a copy of the personal information we hold (this is known as subject access request);
- the right to have your data erased (though this will not apply where it is necessary for us to continue to use the data for a lawful reason);
- the right to have inaccurate data rectified;
- the right to object to your data being used for marketing or profiling; and
- where technically feasible, you have the right to personal data you have provided to us which we process automatically on the basis of your consent or the performance of a contract. This information will be provided in a common electronic format.

Please keep in mind that there are exceptions to the rights above and, though we will always try to respond to your satisfaction, there may be situations where we are unable to do so.

If you would like further information on your rights or wish to exercise them, please write to our Data Protection Officer; Claire Riseborough, [claire@ceras.uk](mailto:claire@ceras.uk) or addressed to The Data Protection Officer, Warden's Office, Kingfishers Bridge Nature reserve, 36A Stretham Road, Wicken, Ely, Cambs, CB7 5XL

We can provide you with a template subject access form which includes guidance on how to make your request (and will help us respond more quickly). Please contact us for a copy of this.

### **Complaints**

You can complain to Kingfishers Bridge directly by contacting our data protection officer using the details set out above. If you wish to make a complaint (including a complaint about fundraising activity) which does not directly relate to your data protection and privacy rights, you can do so in accordance with our charity's complaint policy.

If 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](http://www.ico.org.uk).