

## **NWESSR Privacy Statement**

### **GDPR and Your Personal data**

**About us:** NWESSR is a breed specific dog rescue and rehoming charity, based in the North West of England and dedicated to the care of English Springer Spaniels.

NWESSR takes your privacy seriously. We are committed to protecting your personal information. This policy sets out how NWESSR uses the information that you provide us with in order to help further our work in caring for springer spaniels.

#### **Your Information – what we collect and how we use it**

NWESSR collects information from the public in a number of different ways. For example, we ask for contact and other information when members of the public adopt a NWESSR dog. This may include information such as your name, date of birth and contact information. We use this information to help us provide and improve our services as a charity and to keep a record of our communications with you.

If you are a financial supporter of NWESSR (e.g. by becoming a member/supporter), sponsoring a dog or donating to us we will ask for information that enables us to administer your donation. This will normally include information such as your name, contact details such as address, email or telephone number and your payment details and Gift Aid status.

If you have given us your consent, we may contact you with information and updates on our work, products (such as raffles and calendars) and ways in which you can support us (such as fundraising or volunteering). This may be by post, email, telephone or text message, depending on your preferences. We will also continue to ask about your marketing preferences, to ensure that you are still happy to be contacted by us and by which means. We guarantee that NWESSR will not sell or share your data with any third parties.

#### **What the Law says about protection of personal information**

The current law on Data Protection is contained in the General Data Protection Regulation (the 'GDPR') which came into force in May 2018. The GDPR states that personal data (information relating to a person that can be individually identified) can only be processed (used) if there is a legal ground to do so. Activities like collecting, storing and using personal information fall into the GDPR's definition of processing. The GDPR provides six legal grounds (reasons) under which personal information can be used in a way that is lawful. For the processing to be permitted by law, at least one of the legal grounds must apply.

The four legal grounds that are relevant to NWESSR's use of your personal information are:

- Consent
- Legitimate Interest
- Contract
- Legal Obligation

#### **How the law applies to NWESSR's use of personal information**

NWESSR will only use your personal information if we have:

- asked you and have a record of your express and recent consent for us to do so;
- a 'legitimate interest' to do so in order to support our charitable purposes. Our use will be fair and balanced and never unduly have an impact on your rights;
- a contract with you that we can only fulfil by using your personal information, e.g. to send you an item that you have requested;
- a legal obligation to use or disclose information about you, e.g. we are required by law to keep records of gifts that are given to us with Gift Aid for 4 years.

In extreme situations, such as an accident or medical emergency, we may share your personal details with the emergency services if it is essential for the preservation of life (yours or another persons') for us to do so. This is the 'vital interest' ground for using your personal information. After the emergency, we will always try to inform you about how we had to use your information in that extreme situation.

### **Consent**

NWESSR will always ask for your consent before we communicate with you for particular purposes. For example, we will only email or phone you about our fundraising activities if we have an accurate record of your recent and freely given consent to do so.

You can withdraw your consent at any time by emailing [nwessrmembershipsec@gmail.com](mailto:nwessrmembershipsec@gmail.com)

There are times when it is not practical to obtain and record consent. At those times, we will only process personal information if that processing would meet another legal ground e.g. legitimate interest, in which case we would only process in accordance with the law's strict rules on legitimate interest processing.

### **What is Legitimate Interest?**

This legal ground means that organisations can process your personal information if they first have a genuine and legitimate reason for doing so and secondly that use does not harm any of your rights and interests as an individual.

### **NWESSR's Legitimate Interest**

NWESSR do not unduly prioritise our legitimate interests as a charity over your interests as an individual. We will always respect your rights and balance our interests with your rights. We will only use personal information in a way and for a purpose that you would reasonably expect in accordance with this Policy.

In our view the best way to protect the interests of our supporters is to consider their individual interests and expectations. As a result, we have established the following categories into which members of the public who support NWESSR fall. This allows us to ensure that we use your personal information in a way that matches your relationship with us, your interests and your expectations about your rights.

The three groups for our data protection needs assessments are:

- members of the public who have rehomed a dog from NWESSR
- members of the public who have become members/supporters without adopting a dog, and/or provided financial donations to NWESSR
- members of the public who have demonstrated an interest in our work by contacting us for more information, e.g. to find out more about one of our products or sign up for email alerts via our website.

### **What NWESSR have a legitimate interest to do**

We believe that NWESSR supporters want to know how they can continue to help us to achieve our charitable aims. Unless you tell us not to, we think you are content for us to process (keep and use) your personal information for the following lengths of time. As of May 2018, we promise not to keep your personal information for longer than we specify below. This is not the length of time that we will continue to contact you – this could be a shorter period of time (see below for an explanation of our personalised approach to communications).

- Dogs Trust Rehomer/Sponsor:

These are members of the public who have rehomed a dog from NWESSR or decide to sponsor one of our special springers. On average a dog in the UK lives to the age of 16 years old. We think that you and the dog you have rehomed from us or sponsored would like to remain in contact with us throughout their lifetime and we will therefore keep your personal information to allow for this.

- Members/Supporters of NWESSR:

These are members of the public who have joined as a member or supporter without adopting one of our dogs, or who help or have helped us with financial gifts. We appreciate that such patterns of giving can change over time. We believe that supporters of our mission to care for springer spaniels will remain committed to the importance of caring for these dogs, but we nevertheless stop using the personal information of these supporters after 5 years from the time of the last donation.

- Demonstrated an interest in NWESSR via subscribing for regular updates on our website or making another enquiry:

These are members of the public who have demonstrated an interest in our charitable work by contacting us for more information, e.g. to find out more about one of our events or products. We believe that someone who has contacted us to find out more about NWESSR and what we do would like us to provide that information and perhaps some further information. To allow for this we keep your personal information for a period of 2 years.

Since members of the public demonstrate their support for our work in a number of ways they could be in more than one, or indeed in all, of the above categories. We will review and refresh these categories and the timescales on a rolling basis to ensure that as times and needs change we continue to do the very best by those who support our work.

It is always your choice. If you don't think this is quite right for you, you can tell us to change your communication preferences and our use of your information. You can do this at any time by emailing [nwessrmembershipsec@gmail.com](mailto:nwessrmembershipsec@gmail.com)

### **Legitimate Interest to send you direct mail**

Unless you tell us not to, we will rely on the legitimate interest ground (explained above) in order to send you direct mail. From time to time, we would like to post you updates about our work, products, services and how you can support us (including fundraising activities) which further the aims and objectives of NWESSR in caring for springer spaniels.

We are always mindful of trying to only send you what you are interested in and only as often as is appropriate. We will therefore keep this policy under review. However you're always in control so if you want to ensure that we do not send this type of communication anymore, you can update your preferences at any time by emailing [nwessrmembershipsec@gmail.com](mailto:nwessrmembershipsec@gmail.com)

### **Legitimate Interest to process your information**

We aim to be clear about what information we collect, to enable you to make meaningful choices about how it is used. When it is necessary we will contact you for administrative purposes, e.g. to contact you regarding a payment. We will also hold the minimum personal information required to support our ability to respect your preferences for communication with us. To help you to understand when and why NWESSR would use legitimate interest to process your personal information, the following are examples:

- to send postal communications (as explained above)
- to enhance, modify, personalise and improve our services and communications for the benefit of those who support our work.

- to improve security of our websites and systems.
- to prevent fraud when transacting on our website.
- to process your donations.
- to fulfil online transactions; process and deliver your order(s) for cards, calendars and merchandise. To take payment and arrange delivery, we need to collect personal information, including your payment details, your full name, delivery address and contact details.
- to analyse your personal information to ensure that our communications are relevant to you.

However processing for such purposes as those outlined above will not occur if it harms your rights and interests as an individual, or if you tell us that you'd like us to stop. You can do this at any time by emailing [nwessrmembershipsec@gmail.com](mailto:nwessrmembershipsec@gmail.com)

### **What we DON'T do with your data:**

We at NWESSR will always treat your personal data with confidentiality and respect. We will never:

1. Sell it or share it with Third Parties.
2. Leave it unprotected – all Data is held within secure servers.
3. Collect it unnecessarily.
4. Send you unsolicited advertising material.

### **Your rights and control, and changes to your data**

You are always in control of the data NWESSR hold about you and you can change the way we communicate with you at any time. From time to time we may contact you to ensure that the information you have provided us with remains accurate and up to date. Should you wish to change your preferences you can do this by emailing [nwessrmembershipsec@gmail.com](mailto:nwessrmembershipsec@gmail.com)

As with all organisations, we comply with requests for the disclosure of personal information where this is required or permitted by law. This could include requests from law enforcement or tax agencies. In these circumstances, the request must be submitted in writing and in accordance with the relevant legal requirements.

If you believe your privacy rights have been violated, you may file a complaint with us or with the Information Commissioners office <https://ico.org.uk/>

### **Contact**

Our Secretary and Data Protection Officer can be contacted at [secretary@englishspringerrescue.org.uk](mailto:secretary@englishspringerrescue.org.uk), on 0788 4331017 or c/o 46 Stockton Road Manchester M21 9ED

This information was last updated in May 2018. From time to time, we will make changes to the information on this page. The amended information will apply from the date it is posted on the site and will govern the way in which we collect and use personal information from then on.