



**The Clwyd, Conwy &
Gwynedd Rivers Trust**
Ymddiriedolaeth Afonydd
Clwyd, Conwy a Gwynedd
Creating a better environment / Yn creu amgylchfyd gwell

Data Protection and Confidentiality Policy – June 2018

To deliver the aims of the organisation CCGRT needs to gather, store and use certain forms of information about individuals. To ensure compliance with the provisions of the General Data Protection Regulation and the Data Protection Act, CCGRT will adopt the following measures:

Data protection principles

CCGRT will only collect data where lawful and where it is necessary for the legitimate purposes of the Trust. When collecting data, CCGRT will always provide a clear and specific privacy statement explaining to the subject why the data is required and what it will be used for.

CCGRT will not collect or store more data than the minimum information required for its intended purpose. CCGRT will ask members and volunteers to check and update their data on a regular basis. Any individual will be able to update their data at any point by contacting the CCGRT Secretary.

CCGRT will keep records for no longer than is necessary to meet the intended use for which it was gathered (unless there is a legal requirement to keep records).

Information will not be shared with third parties other than with the specific consent of the person for whom the information is held.

Data will not be used for any purpose other than the administration, operation and promotion of CCGRT.

Security

CCGRT will ensure that data held by us is kept secure.

Electronically-held data will be held within a password-protected and secure environment

Physically-held data will be stored securely. Access to data will only be given to relevant trustees/members where it is clearly necessary for the running of the Trust.

Individual's rights

When CCGRT collects, holds and uses an individual's personal data that individual has the following rights over that data. CCGRT will ensure its data processes comply with those rights and will make all reasonable efforts to fulfil requests from an individual in relation to those rights.

- *Right to be informed:* whenever CCGRT collects data it will provide a clear and specific privacy statement explaining why it is being collected and how it will be used.

- *Right of access:* individuals can request to see the data CCGRT holds on them and confirmation of how it is being used. Requests should be made in writing to the CCGRT secretary and will be complied with free of charge and within one month. Where requests are complex or numerous this may be extended to two months.
- *Right to rectification:* individuals can request that their data be updated where it is inaccurate or incomplete. CCGRT will request that members, staff and contractors check and update their data on a regular basis. Any requests for data to be updated will be processed within one month.
- *Right to object:* individuals can object to their data being used for a particular purpose. CCGRT will always provide a way for an individual to withdraw consent in all marketing communications. Where we receive a request to stop using data we will comply unless we have a lawful reason to use the data for legitimate interests or contractual obligation.
- *Right to erasure:* individuals can request for all data held on them to be deleted. CCGRT data retention policy will ensure data is not held for longer than is reasonably necessary in relation to the purpose it was originally collected. If a request for deletion is made we will comply with the request unless:
 - i. There is a lawful reason to keep and use the data for legitimate interests or contractual obligation.
 - ii. There is a legal requirement to keep the data.

Obligations to partner organisations

Where not specifically mentioned above CCGRT will ensure compliance with the requirements and conditions stipulated in the Agreements with its partner organisations.

Privacy Notice

INTRODUCTION – THE PURPOSE OF THIS PRIVACY NOTICE

The Clwyd, Conwy and Gwynedd Rivers Trust (“We”) are committed to protecting the privacy and security of your personal information. Please read this privacy notice carefully to understand our views and our practices regarding your personal data. The notice covers how we collect and use your personal information during and after your working relationship with us, in accordance with the General Data Protection Regulation (GDPR). It applies to all our clients.

DEFINITIONS

The Clwyd, Conwy and Gwynedd Rivers Trust is a “data controller”. This means we determine the purposes and means of processing personal data.

A “data processor” is responsible for processing personal data on behalf of a controller. We will always use data processors who are GDPR compliant.

Personal data is defined by the GDPR as meaning any information relating to an identifiable person who can be directly or indirectly identified by reference to an identifier (Article 6).

For example, full name, home address, private email address or telephone number. Online identifiers include IP addresses and cookies.

There are also special categories of personal data, which is referred to as sensitive data (Article 9). For example, racial or ethnic origin, health data, biometrics or political opinions. We will never store any such data.

HOW TO CONTACT US

The Clwyd, Conwy and Gwynedd Rivers Trust is the data controller and as such, we decide how your personal data is processed and for what purposes (as explained in this privacy notice). Should you wish to discuss your personal data, or any queries regarding how we hold or process personal data, please contact the Trust secretary.

DATA PROTECTION PRINCIPLES

We will comply with data protection law (GDPR). This says that personal information we hold about you must be:

1. Processed lawfully, fairly and in a transparent manner;
2. Collected for specific, explicit and legitimate purposes;
3. Adequate, relevant and limited to what is necessary;
4. Accurate and up to date;
5. Kept in a form which permits identification of data subjects (a natural person) for no longer than is necessary;
6. Processed in a manner that ensures appropriate security of the personal data.

WHY WE KEEP AND PROCESS YOUR PERSONAL DATA

We will use your personal data for the following purposes:

1. To meet contractual obligations
2. To meet legal obligations
3. Where consent has been positively given for marketing purposes

We will only collect basic personal data to fulfil the above purposes, and this does not include any special categories of personal information about you. This information will include your name, address and personal email address.

We will collect personal data from our clients themselves and will never accept personal data from third parties. The data will be collected from our clients for 1 and 2 above, to continue our professional relationship.

Data will be collected for 3 above, primarily for marketing purposes and always with a GDPR complaint method (for example, MailChimp as an emarketing solution).

WHAT IS OUR LEGAL BASIS FOR PROCESSING YOUR PERSONAL DATA?

The GDPR outlines 6 legal bases for processing personal data. Of these six, the Rivers Trust has identified 3 lawful bases for collecting and processing personal data. These are:

1. Contractual: personal information is collected and processed where we need to perform the contract/agreement we have entered with you
2. Legal: where it is necessary to collect and process personal information to comply with the law
3. Consent: where consent has been freely given for marketing purposes

DATA SHARING

The Clwyd, Conwy and Gwynedd Rivers Trust will not share your data for marketing purposes with any third parties. We will only share your personal information with third

parties when required by the law to do so, where it is necessary to administer the working relationship with you or where we have another legitimate interest in doing so.

DATA STORAGE

Our data is stored on a password protected desktop in a secure building.

Please be aware that your information may be stored on a cloud-based system, whose servers are located outside of the EU. We will always ensure that we use a GDPR complaint company for this service.

DATA SECURITY

We have put in place security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. We do not have any employees, agents or contractors who have or would have access to your personal information.

DATA RETENTION

We will only retain your personal information for no longer than is reasonable necessary to fulfil the purposes it was collected for. To determine these lengths of time we consider the amount, nature, sensitivity of the data, potential risk of harm from unauthorised use or disclosure, the purposes for which we process your personal data and whether we can achieve those purposes through other means.

YOUR RIGHTS AND YOUR PERSONAL DATA

The GDPR provides the following rights for you as individuals:

1. Right to be informed about the collection and use of your personal data
2. Right of access (referred to as a “data subject access request”) to your personal data
3. Right to rectification – where personal data may be out of date
4. Right to erasure of your personal data when it is no longer necessary to retain it
5. Right to withdraw your consent at any given time, where consent was the lawful basis for processing the data
6. Right to restrict personal data processing
7. Right to request the transfer of your personal data to another data controller or processor
8. Rights in relation to automated decision making and profiling (not used by the Rivers Trust). For more information on your rights as individuals, please visit the ICO website.

FURTHER PROCESSING

If we wish to use your personal data for a new purpose, that isn’t covered in this privacy notice, we will provide you with a new notice and explanation.

CHANGES TO OUR PRIVACY NOTICE

We reserve the right to update this privacy notice from time to time, and we will provide you with a new privacy notice when we make any substantial changes. Please check back frequently to see any updates or changes.