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**HINKSEY TRAIL REGENERATION C.I.C.**

**DATA POLICY**

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Updated: February 2021

Hinksey Trail Regeneration CIC respects your privacy. Your personal data is protected in the UK by the General Data Protection Regulation. Under the General Data Protection Regulation, we have a legal duty to protect any information we collect from you. Any information that you give us is held with the utmost care and security. We will only process it where there is a lawful basis to do so. We do not and will not pass on your details to any third party or government department unless you give us permission to do so or as otherwise required by law.

## **POLICY INFORMATION**

This policy applies to:

- All visitors of the area known as The Hinksey Heights Nature Trail (the "Trail");
- All parts of the Trail which are under the management of Hinksey Trail Regeneration CIC;
- All volunteers, directors, or members operating on behalf of Hinksey Trail Regeneration CIC.

Hinksey Trail Regeneration CIC will use its best endeavours to ensure that volunteers, directors, or members adhere to this policy at all times.

## **INTRODUCTION**

The purpose of this policy is to enable Hinksey Trail Regeneration CIC to:

- Comply with the law in respect of the data it holds about individuals;
- Protect the personal data of The Hinksey Heights Nature Trail visitors, members, directors, and volunteers.

The data protection principles require that personal information is:

- Processed fairly and lawfully
- Processed for limited purposes
- Adequate, relevant and not excessive
- Accurate and up to date
- Not kept for longer than is necessary
- Processed in line with the rights of individuals
- Secure
- Not transferred to countries outside the UK without adequate protection

This policy applies to information relating to identifiable individuals.

## **WEBSITE**

### **WHAT INFORMATION IS COLLECTED?**

The Hinksey Heights Nature Trail does not collect information relating to specific website users.

User-supplied information: when contact is made via our website, we may ask you for your name, e-mail address, and other information. Any information supplied by the user is supplied voluntarily unless otherwise stated. If you do not want us to hold information about you, please do not supply it to us; this may mean, however, that we are not able to respond to your requests.

### **OTHER INFORMATION (COOKIES)**

We sometimes use Google Analytics to research user activities on our website in order to enhance its performance and usability. In the course of conducting this research Google places a First Party session 'cookie' on your browser and collects aggregate information. The cookie is a small amount of information recording details of your visit to our website but does not identify you. Aggregate information is used to show us the total number of visits to our website and which parts of the site are used the most. It does not identify individuals, as it does not contain any personal data. This information helps us to develop our website and initiate improvements to the services. If you would prefer, you can set your browser to disable cookies. Information on how to disable cookies can be obtained by referring to either your Operating Systems Manual or your Browser Guide, or by contacting your Internet Service Provider. You should be aware that if you disable cookies our website may not perform as it was intended. If you have any questions or concerns regarding this cookie policy please contact us.

In order to help you access and use the site as efficiently as possible, the company may use cookies to store and record your use of the site. Cookies are technical files that are sent to your browser and stored on your computer. Use of cookies is standard in many web sites. Most browsers are initially set up to accept cookies. You can reset your browser settings either to notify you when you receive a cookie, or to refuse to accept cookies. You should understand that certain areas of the site may not function properly if you set your browser to not accept cookies or if you reject a cookie.

### **APPLICABLE LAW**

This Website is created and controlled by Hinksey Trail Regeneration CIC and is subject to the laws of England & Wales and subject to the jurisdiction of the English courts. Hinksey Trail Regeneration CIC reserves the right to make changes to the site and this privacy statement from time to time.

## **POLICY STATEMENT**

Hinksey Trail Regeneration CIC will:

- Comply with both the law and good practice

- Respect individuals' rights
- Be open and honest with individuals whose data is held

## RESPONSIBILITIES

Hinksey Trail Regeneration CIC recognises its overall responsibility for ensuring that it complies with its legal obligations.

The Data Protection Officer (DPO) is the person with the following responsibilities:

- Briefing Hinksey Trail Regeneration CIC directors, volunteers, and members on data protection responsibilities
- Reviewing data protection and related policies
- Advising other staff on data protection issues
- Handling subject access requests and other requests by users in relation to their rights including receiving any complaints
- Security

This section of the policy only addresses security issues relating to personal data. It does not cover security of the building, business continuity or any other aspect of security.

## DATA RECORDING AND STORAGE

Hinksey Trail Regeneration CIC will regularly review its procedures for ensuring that its records remain accurate and consistent and, in particular:

- Our IT systems will be designed, where possible, to encourage and facilitate the entry of accurate data
- Data on any individual will be held in as few places as necessary and the holding of unauthorised or unofficial data sets is against company policy
- Effective procedures will be in place so that all relevant systems are updated when information about any individual changes
- Volunteers' data held will be released to other volunteers in order to facilitate the volunteer work at the Trail. This will only be mobile and/or email for contact/communication and limited information on the volunteers' relevant skills and capacity for the work undertaken on the Trail. By volunteering with us, you are deemed to have given permission for essential data such as your telephone number to be released to another relevant volunteer or volunteers. This permission may be withdrawn at any time by the member in notifying in writing to the Hinksey Trail Regeneration CIC chairman at any time or by indicating this to us when you sign up to volunteer.

Further details of this are contained in the privacy statement contained below.

## **WILDLIFE CAMERAS**

Hinksey Trail Regeneration CIC:

- Installed wildlife cameras for the primary purpose of capturing clear images of the wildlife found along the Trail, to assist with the understanding, monitoring, and education of the local community as to the habitats and wildlife that can be found in the area;
- Positioned the cameras to minimise capturing images of persons visiting the Trail. The cameras are moved occasionally to assess different sections of the Trail, and the location of the cameras is only provided to a limited number of authorised persons;
- Will place visible signs showing that wildlife cameras are in operation.

The wildlife cameras are such that they are mostly in a dormant “off” mode and are triggered into a recording “on” mode when motion is sensed within the scope of the camera lens.

The recorded images are stored on the cameras’ internal storage until such a time as an authorised person retrieves the cameras and downloads the recorded images onto a secure computer to review the footage. The cameras will be checked by an authorised person at least every 28 days.

The focus of the cameras is not to produce images for law enforcement bodies to use to investigate crime. However, should the cameras capture any such images which may be helpful to law enforcement bodies, Hinksey Trail Regeneration CIC may share this footage with any law enforcement bodies as required.

Once the footage is downloaded onto a secure computer by an authorised person, the internal storage of the cameras will be cleared. Downloaded recorded images which contain no images of any person or persons may be kept indefinitely. Downloaded recorded images which do contain images of any person or persons will be deleted as soon as possible, and no later than 28 days, with the exception of images useful to law enforcement bodies.

Downloaded recorded images which do not contain images of any person or persons may be shared to third parties. Downloaded recorded images which do contain images of any person or persons will not be provided to third parties, save for law enforcement bodies.

## **POLICY REVIEW**

The policy is to be reviewed on an annual basis or at such time that the Data Protection legislation is amended.

## **PRIVACY STATEMENT**

When you request information from Hinksey Trail Regeneration CIC or sign up to any of our volunteer groups, Hinksey Trail Regeneration CIC obtains information about you. This statement explains how we look after that information and what we do with it.

We have a legal duty under the General Data Protection Regulation to prevent your information falling into the wrong hands. We must also ensure that the data we hold is accurate, adequate, relevant and not excessive.

Email address and/or telephone numbers of volunteers and your ability and willingness to carry out certain tasks may be given to other current volunteers for the purposes of facilitating activities pertaining to the regeneration of the Trail.

Whenever we collect information from you, we will make it clear which information is required in order to provide you with the information, service or goods you need. You do not have to provide us with any additional information unless you choose to, but if you do not provide it we may not be able to provide you with the information, service or goods you have requested. We store your information securely on our computer system, we restrict access to those who have a need to know, and we train our staff in handling the information securely.

The lawful basis for us processing your personal data will be:

- legitimate interest in relation to information and communications relevant to your volunteering activities with us and related matters;
- legitimate interest in relation to information and communications in order to respond to any enquiry from you, including via our website.

You have the right to a copy of all the information we hold about you (apart from a very few things which we may be obliged to withhold because they concern other people as well as you). To obtain a copy, please write to the Data Protection Officer (DPO) at Hinksey Trail Regeneration CIC's registered office or by email to [hinkseytrail@gmail.com](mailto:hinkseytrail@gmail.com).

Hinksey Trail Regeneration CIC reserves the right to charge you for a copy of your data (as permitted by law). We aim to reply as promptly as we can and, in any case, within the legal maximum of 30 days. Hinksey Trail Regeneration CIC a company registered in England with company no. 12949996 whose registered office is at 26 Hurst Rise Road, Oxford OX2 9HQ.

You can contact us in relation to this Policy and your personal data:

By mail to the registered office address

By email to [hinkseytrail@gmail.com](mailto:hinkseytrail@gmail.com)

The UK regulator for data protection is the Information Commissioner and you can find their details at [www.ico.org.uk](http://www.ico.org.uk) , but please contact us in the first instance.