

Suffolk Central Branch Registered Charity No.206269

Privacy Notice

Who we are

This privacy policy sets out how RSPCA Suffolk Central Branch uses and protects any personal data that you give us. All references to 'we', 'us' or 'our' in this policy refers to the RSPCA Suffolk Central Branch.

RSPCA Suffolk Cental Branch is registered charity (Registered Charity 206269) with the <u>Charity</u> <u>Commission</u>, and is the data controller and responsible for your personal data. If you have questions about how the Branch handles your information, please contact the Branch using its contact details listed.

If you are an employee, worker, or contractor, please refer to the separate Privacy Notice in your Employee Handbook.

We are committed to protecting your privacy and keeping your personal information safe. Should we ask you to provide certain information by which you can be identified, it will only be used in accordance with this privacy statement.

We are within our rights to update and change this policy at our discretion. We will publish the most current version on our website. You should check this policy from time to time to ensure that you are happy with any changes.

When dealing with your personal information we will comply with the General Data Protection Regulation (GDPR), and any other applicable legislation.

If a modification meaningfully reduces your rights, we'll notify people whose personal data we hold and are affected.

When do we collect your details?

We will collect relevant information when you:

- Make a donation to us, including online donations, processing Safe Haven sponsorship, signing up for Gift Aid on donated goods and monetary donations, donating online, or pledging to leave a legacy to the Branch
- Apply for a paid job
- Apply tp become a volunteer and/or member of the Branch
- Use our veterinary clinic, request a neutering or microchipping voucher or request financial aid for veterinary bills
- Apply to adopt or foster an animal from us
- Sign over an animal to us
- Report your animal lost or stolen to us or leave a stray animal with us
- Ask to receive our newsletter or other updates on our activities
- Contact us to ask for help, make a complaint or ask for information

• Telephone, write, email or make contact via social media, or otherwise provide us with your personal information

We may have installed CCTV systems in some of our premises for the purposes of our legitimate interest in crime prevention and detection. CCTV is also installed on the outside of some of our buildings for the purpose of monitoring the security of our people and property. Images captured by CCTV will not be kept for longer than necessary. However, on occasions, there may be a reason to keep images for longer (e.g., if a crime is being investigated). You have the right to access CCTV images of yourself. Signage advising of CCTV equipment will give notice of areas covered by CCTV.

What we collect

We may collect the following information:

- your name and postal address
- contact information including email address and telephone number
- demographic information such age, gender, or marital status as part of our service delivery or business analysis
- date of birth
- bank account details
- communication preferences
- other information relevant to our services, e.g., details of your benefit status if using our Clinic or welfare voucher scheme, details of your health if you are applying to adopt or foster an animal

As part of our **adoption/fostering process** we may carry out a home visit to help match you with the right animal. This home visit may be carried out by a volunteer or a member of staff of the Branch, or another charity within the RSPCA network, who will be acting for our Branch for these purposes. In processing your application, we may collect special category data, in particular about your health, and we will only process this information on the basis of your explicit consent and specifically for the purpose of ensuring a suitable match between you and the animal available for adoption/fostering (e.g., fur allergy).

If you have registered your interest in volunteering or have applied for a job with the branch, we will collect your name, address, email address and contact telephone numbers and ask you for details regarding your application. Sometimes, criminal records and other checks may be required in line with our safeguarding and legal obligations. In processing your application, we may collect special category data, in particular about any disability, and we will only process this information on the basis of your explicit consent and specifically for the purpose of ensuring we meet our legal obligations (e.g., to make reasonable adjustments). We may also seek references who will need to consent to being contacted by the Branch. Next of kin details will be requested if your application is successful, as part of our legal responsibility for your safety whilst with us. Occasionally we need to contact a third party if concerned about your vital interests (e.g., in a medical emergency). We may also have a legitimate interest in sharing some of your personal data with the national RSPCA, who support branches in governance and administration, including recruitment of staff and volunteers.

We may use images of you and/or your pet in relation to promoting our charitable activities or fundraising. Please note that we (or our authorised partners) may film or photograph participants, volunteers and spectators attending or taking part in our events and use such footage or photographs. We do this in order to publicise our work in advertising, publications, marketing material, social media, personalised direct mail and other media that may be made available to the public.

No personal details (including names) of any under 16-year-olds will be used in any publicity materials without written consent from the individual or a parent or legal guardian (depending on their age), but we may use images where children are incidentally included (for example, images of mass participation).

We do display images of animals that have been adopted and in the majority of cases this will not be considered as personal data. However, as an adopter of an animal, you can always request at adoption that their image is not used, or that it is removed from the branch's channels at any time. **If you participate in a fundraising event that we have organised** such as annual fair, dog show, raffle, competition, or prize draw, etc., we may collect personal information such as your name and contact telephone number in order to administer the activity. The legal basis for this is performance of a contract with you.

How do we use your data?

The lawful basis that we rely on for processing your data will depend upon the circumstances in which it is being collected and used, but will in most cases fall into one of the following categories:

- where you have provided your consent to allow us to use your data in a certain way
- where the processing is necessary to carry out the performance of a contract with you
- where the processing is necessary in order for us to comply with a legal obligation
- where it is in our legitimate interests to perform our functions, for example, processing donations or sending you administrative communications where our legitimate interest is to raise funds and to deliver our charitable purposes

We will use the information you provide to give you the services, products, or information you asked for, to administer your donation including processing gift aid, reply to a complaint or contact you about Branch activities.

We may also send you service communications, for example confirming a direct debit instruction when you have made a donation to us, and marketing communications such as postal newsletters

The Branch **may send you postal communications** such as newsletters, fundraising appeals and event flyers if you have adopted or fostered an animal, volunteered, made a donation or expressed an interest in fundraising. The legal basis for this is legitimate interest as a charity responsible for raising its own funds, and to ensure those people who contribute to our cause feel valued and informed about our activities and how their support has helped our charity.

When we share your data

We will only pass your data to third parties in the following circumstances:

- you have provided your explicit consent for us to pass data to a named third party;
- we are using a third party purely for the purposes of processing data on our behalf and we have in place a data processing agreement with that third party that fulfils our legal obligations in relation to the use of third party data processors; or
- we are required by law to share your data.
- we may also have a legitimate interest in sharing some of your personal data with third parties, in particular the national RSPCA, who as the umbrella charity supports branches in governance and administration.

All the personal data we hold about you will be processed by our staff in the United Kingdom.

Data stored in the cloud will be stored on secure servers. This data will primarily be stored in UK and EU data centres but may include transfer outside of the UK and EU, particularly for car processing.

These businesses have each provided safeguards to ensure the safety of your personal data, and it shall be processed to at least the same standards as set out by the General Data Protection Regulation.

We may allow our staff or other persons acting on our behalf, for example home visitors or vets, to access and use your personal information for the purposes which you have provided it to us. If we do this, we will not give those individuals/organisations any rights to use your personal information (or to contact you) except in accordance with our instructions and in accordance with this Privacy Notice.

Microchipping

We try to make sure that all animals are microchipped when they're rehomed from us; this is a legal requirement in relation to some animals (e.g. dogs and cats). We also provide a microchipping service to owners who are seeking reduced price microchipping for their pets. We share your personal information with a microchip company in order that the microchip can be registered with the microchip company. Details of which company the microchip is registered with will be provided to you; you can find out how they process your data from their website or by requesting a copy of their Privacy Notice from them directly. We may also share the information with RSPCA HQ (Registered charity 219099, Wilberforce Way, Southwater, Horsham RH13 9RS.)

If we scan a microchip in a stray animal, we will contact the microchip database company and follow their process to contact you to let you know we've found your pet. The legal basis for this is our legitimate interest as an animal welfare organisation in matching stray animals with owners. If, after taking all reasonable steps to trace an owner, we are unable to make contact, we will seek to rehome the animal and re-register the microchip accordingly.

Holding on to your personal data

We take the principles of data minimisation and removal seriously and have internal policies in place to ensure that we process the minimum amount of data for the associated purpose and further minimise or delete that data once it is no longer required.

Data will be retained in compliance with legal obligations e.g., HMRC require that we retain Gift Aid forms for six years.

Where data is collected on the basis of consent, we will consider any positive engagement with the charity (e.g. email, donation) as continued consent, and seek regular renewal of consent from those who do not actively engage with us.

Online donations and payments

To make an online donation, you will be directed to a third-party merchant service payment gateway. Payment gateways use security features and encryption to ensure your data remains safe. They will offer a choice for you to opt-in to receive marketing communications from us. We may send your postal communications under the legal basis of legitimate interest.

Further information about the collection and use of the data will be provided on the relevant payment gateway for you.

Security

We are committed to ensuring that your information is secure. In order to prevent unauthorised access or disclosure, we have put in place suitable physical, electronic and managerial procedures to safeguard and secure the information we collect.

How we use cookies

A cookie is a small file which asks permission to be placed on your computer's hard drive. Once you agree, the file is added and the cookie helps analyse web traffic or lets you know when you visit a particular site. Cookies allow web applications to respond to you as an individual. The web application can tailor its operations to your needs, likes and dislikes by gathering and remembering information about your preferences.

We use traffic log cookies to identify which pages are being used. This helps us analyse data about webpage traffic and improve our website in order to tailor it to customer needs. We only use this information for statistical analysis purposes and then the data is removed from the system.

Overall, cookies help us provide you with a better website by enabling us to monitor which pages you find useful and which you do not. A cookie in no way gives us access to your computer or any information about you, other than the data you choose to share with us.

You can choose to accept or decline cookies. Most web browsers automatically accept cookies, but you can usually modify your browser setting to decline cookies if you prefer. This may prevent you from taking full advantage of the website.

If you want to know more about cookies, the Information Commissioner's Office (ICO) website has a useful guide giving further information.

Links to other websites

Our website may contain links to other websites of interest. However, once you have used these links to leave our site, you should note that we do not have any control over that other website.

Therefore, we cannot be responsible for the protection and privacy of any information which you provide whilst visiting such sites and such sites are not governed by this Privacy Notice. You should exercise caution and look at the privacy statement applicable to the website in question.

Controlling your personal information

We will not sell, swap, or lease your personal information to third parties. You have a range of rights over your data, which include the following:

- Where data processing is based on consent, you may revoke this consent at any time and we will make it as easy as possible for you to do this (for example by putting 'unsubscribe' links at the bottom of all our marketing emails).
- You have the right to ask for rectification and/or deletion of your information.
- You have the right of access to your information.
- You have the right to lodge a complaint with the Information Commissioner if you feel your rights have been infringed.

A full summary of your legal rights over your data can be found on the Information Commissioner's website <u>here</u>.

If you would like to access the rights listed above, or any other legal rights you have over your data under current legislation, please write to: Branch Manager, RSPCA Suffolk Central Branch

(RCN 206269) RSPCA Animal Centre, Mill Lane, Martlesham, IP12 4PD, telephone 0300 999 7321 or email <u>info@rspca-suffolkcentral.org.uk</u>

Please note that relying on some of these rights, such as the right to deleting your data, will make it impossible for us to continue to deliver some services to you. However, where possible we will always try to allow the maximum access to your rights while continuing to deliver as many services to you as possible.

Withdrawing consent

You can also change your mind at any time about how we contact you or ask us to stop contacting you altogether. If you request no further contact from us, we will keep the information we hold on you and add you to our suppression lists to ensure that you do not receive unwanted material in the future. Please send an email to info@rspcasuffolkcentral.org.uk or write to: Branch Manager, RSPCA Suffolk Central Branch, RSPCA Animal Centre, Mill Lane, Martlesham, IP12 4PD.

The Fundraising Regulator requires us to take action to ensure that any requests to cease marketing communications are addressed within 21 days.

Data Breach

We have a duty to report certain types of personal data breach to the relevant supervisory authority (Information Commissioners Office). We will do this within 72 hours of becoming aware of the breach, where feasible. If the breach is likely to result in a high risk of adversely affecting individuals' rights and freedoms, we will also inform those individuals without undue delay.

How to complain about the use of your data

If you wish to raise a complaint about how we have handled your personal data, including in relation to any of the rights outlined above, you can contact: Branch Manager, RSPCA Suffolk Central Branch, RSPCA Animal Centre, Mill Lane, Martlesham, IP12 4PD, or email info@rspca-suffolkcentral.org.uk who will investigate your concerns. If you are not satisfied with our response, or believe we are processing your data unfairly or unlawfully, you can complain to the Information Commissioner's Office (ICO). You can find further information about the ICO and their complaints procedure here: https://ico.org.uk/concerns/

If you have any questions, comments, or concerns about this Policy, please contact us (details as above

This Privacy Notice was last updated on 30th June 2023