

Bardsey Bird Observatory Privacy Policy

This privacy policy explains how and why we use your personal data, to make sure you stay informed and can be confident about giving us your information.

Privacy and Security

The privacy and security of your personal information is extremely important to us. Bardsey Bird Observatory is committed to protecting the privacy and security of any personal details that we hold. We will meet or exceed the requirements of all current UK and EU legislation on data protection and privacy of communications – the EU General Data Protection Regulation (from 25 May 2018), the UK Data Protection Act and Privacy of Electronic Communication Regulation

Our website can be used without the need to disclose any personal information. Personal data, such as names, addresses and email details are only gathered in order to fulfil specific information requests or subscriptions to our products and services.

We'll keep this page updated to show you all the things we do with your personal data. This policy applies if you're a supporter of the Observatory (member, donor, volunteer, customer or employee), visit our website, email, call or write to us. We will never sell your personal data.

Who are 'we'?

In this policy, whenever you see the words 'we', 'us', 'our', 'BBFO', 'the Observatory' 'Bardsey Lodge', it refers to The Bardsey Bird and Field Observatory.

The Bardsey Bird and Field Observatory is a charitable organisation registered in England and Wales (Reg. No. 249790.) with the aim to Monitor the wildlife of Bardsey Island.

The Observatory carries out a range of trading activities to generate income for the charity including sale of gifts and souvenirs at its shop and online, income from commercial partnerships including sponsorship, and renting accommodation rooms at Bardsey Lodge.

What personal data do we collect?

Your personal data (any information which identifies you, or which can be identified as relating to you personally for example, name, address, phone

number, email address) will be collected and used by us. We'll only collect the personal data that we need.

We collect personal data in connection with specific activities such as memberships, placing an order, booking holidays, donations, volunteering, conducting research, employment etc.

You can give us your personal data by filling in forms on our website, by registering to use our website, participate in discussion, taking part in research (ringing and bird census), entering a competition, promotion or survey or by corresponding with us (by phone, email or by joining as a member / supporter / customer.

This personal data you give us may include name, title, address, date of birth, age, gender, employment status, demographic information, email address, telephone numbers, personal description, photographs, CCTV images, opinions, usernames and passwords.

If you buy membership as a gift or are the parent of one of our junior supporters, including volunteers, your details will be recorded and your association with that relationship will be recorded.

We may automatically collect the following information via our web services: Technical information, including the Internet protocol (IP) address used to connect your computer to the Internet, your login information, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform and if you access our website via your mobile device we will collect your unique phone identifier Information about your visit, including, but not limited to the full Uniform Resource Locators (URL) and query string, clickstream to, through and from our website (including date and time), products you viewed or searched for, page response times, download errors, length of visits to certain pages, page interaction information (such as but not limited to, scrolling, clicks, and mouse-overs), methods used to browse away from the page, and any phone number used to call our customer service number Information about your purchases including but not limited to revenue figures, the types of products purchased, membership application, purchase ID, Holiday booking ID, and Renewal ID.

Personal data created by your involvement with us

Your activities and involvement with BBFO 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. If you decide to donate to us then we'll 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. The sections Research and Profiling gives more detail about how we use information for profiling and targeted advertising, including giving you more relevant digital content.

Sensitive personal data

At times we'll collect sensitive personal data for Equal Opportunities monitoring, as well as researching whether we deliver great experiences for everyone, but this is only ever analysed at an aggregate level.

Volunteer

If you're a volunteer 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 or contractual reasons, to protect us (including in the event of an insurance or legal claim) and for safeguarding purposes.

Children's personal data

Family membership

Children aged under 18 are included on family memberships and are members of BBFO. We may collect their names and dates of birth. We don't ask children on family memberships for consent to marketing communications, so they don't receive them.

Junior and Young Person membership

Junior membership is available to everyone under the age of 18. Under 13s can have their membership bought for them as a gift by an adult, while those aged between 13 and 17 can buy membership online, by phone or at our shop. Young Person membership is available from the age of 17.

When a Junior or Young Person member becomes 18, we'll carry over their marketing consents if they have made them.

Marketing to young people and fundraising

We won't send marketing emails, letters or make calls to people under the age of 13. We will not send any marketing communications requesting donations to young people aged between 13 and 17 and won't profile anyone under the age of 18.

Our newsletters may sometimes include competitions or ideas about how to raise money, but they are a member benefit. Most newsletter content is about our work, conservation and ideas to help you make the most of your membership.

How we use your personal data

We'll only use your personal data on relevant lawful grounds as permitted by the EU General Data Protection Regulation (from 25 May 2018)/UK Data Protection Act and Privacy of Electronic Communication Regulation.

Personal data provided to us will be used for the purpose or purposes outlined in any fair processing notice in a transparent manner at the time of collection or registration where appropriate, in accordance with any preferences you express. If asked by the police, or any other regulatory or government authority investigating suspected illegal activities, we will provide your personal data.

Your personal data may be collected and used to help us deliver our charitable activities, help us raise funds, or complete your order or request. Below are the main uses of your data which depend on the nature of our relationship with you and how you interact with our various services, websites and activities.

Personal data that we hold on members and guests is primarily used for:

- Administration and fulfilment of membership
- Notification of Observatory news, events and activities
- Notification and updates for the 'Adopt-a-Manxie' scheme
- Contacting guests regarding their stay at Bardsey Lodge
- Cross referencing ringing data and the ringer
- Cross referencing observers and their records
- In-house analysis

Personal data may also be used for:

Marketing communications

Your privacy is important to us, so we'll always keep your details secure. We'd like to use your details to keep in touch about things that may matter to you. If you choose to hear from us we may send you information based on what is most relevant to you or things you've told us you like. We may also show you relevant content online. This might be about visiting our places, volunteering with us, membership, events, conservation work, fundraising, our shop and staying at the Lodge.

We'll only send these to you if you agree to receive them and we will never share your information with other companies outside the Bird Observatories Council for inclusion in their marketing. (We may however share cookie data with third parties to help with our own advertising targeting). If you agree to receive marketing information from us you can change your mind at a later date. However, if you tell us you don't want to receive marketing communications, then you may not hear about events or other work we do that may be of interest to you. Personal data provided to us may also be profiled to help us with advertising targeting. For example, your membership data may be used to ensure we don't serve you online membership advertisements. Or we may use your personal data to find online users with a similar profile to yourself who may be interested in our products or services. We may sometimes use third parties to capture some of our data on our behalf, but only where we are confident that the third party will treat your data securely, in accordance with our terms and in line with the requirements set out in the GDPR.

We'll always act upon your choice of how you want to receive communications (for example, by email, post or phone). However, there are some communications that we need to send. These are essential to fulfil our promises to you as a member, volunteer, donor or buyer of goods or services from the Observatory. Examples are (but not exclusively):

Transaction messaging, such as Standing Order processing, shop purchase confirmations and holiday booking confirmations
Membership-related mailings such as renewal reminders, Bardsey Beacon and Bardsey's Wildlife and notice of our Annual General Meeting

Membership including newsletters and magazines

We use the personal data you provide as a member provide to service your membership. This includes sending renewal information to annual members by mail and email, sending Observatory publications and information about our Annual General Meeting. It's also used to manage your membership online.

Fundraising, donations and legacy pledges

Where we have your permission, we may invite you to support vital conservation work by making a donation, buying a raffle ticket, getting involved in fundraising activities or leaving a gift in your will.

Occasionally, we may invite some supporters to attend special events to find out more about the ways in which donations and gifts in wills can make a difference to specific projects and to our cause. We'll also send you updates on the impact that you make by supporting us in this way, unless you tell us not to.

If you make a donation, we'll use any personal information you give us to record the nature and amount of your gift, claim gift aid where you've told us you're eligible and thank you for your gift. If you interact or have a conversation with us, we'll note anything relevant and store this securely on our systems. If you tell us you want to fundraise to support our cause, we'll use the personal information you give us to record your plans and contact you to support your fundraising efforts. If you've told us that you're planning to, or thinking about, leaving us a gift in your will, we'll use the information you give us to keep a record of this – including the purpose of your gift, if you let us know this. If we have a conversation or interaction with you (or with someone who contacts us in relation to your will, for example your solicitor), we'll note these interactions throughout your relationship with us, as this helps to ensure your gift is directed as you wanted.

Charity Commission rules require us to be assured of the provenance of funds and any conditions attached to them. We follow a due diligence process which involves researching the financial soundness, credibility, reputation and ethical principles of donors who've made, or are likely to make, a significant donation to BBFO.

As part of this process we'll carry out research using publicly available information and professional resources. If this applies to you, we'll remind you about the process when you make your donation.

Management of volunteers

We need to use your personal data to manage your volunteering, from the moment you enquire to the time you decide to stop volunteering with us. This could include: contacting you about a role you've applied for or we think you

might be interested in, expense claims you've made, weeks you've booked and to recognise your contribution.

We may also share this with funders to help them monitor how their funding is making a difference.

Retail sales, holidays and events management

We process customer data in order to fulfil holiday bookings and retail activities. Your data will be used to communicate with you throughout the process, including to confirm we've received your order and payment, to confirm dispatch, to clarify where we might need more detail to fulfil an order or booking, or to resolve issues that might arise with your order or booking. For fully catered weeks may also hold dietary requirements.

Research

We sometimes carry out research with our supporters, customers, staff and volunteers to get feedback on their experience with us. We use this feedback to improve the experiences that we offer and ensure we know what is relevant and interesting to you.

If you choose to take part in research, we'll tell you when you start what data we will collect, why and how we'll use it. All the research we conduct is optional and you can choose not to take part. For some of our research we may ask you to provide sensitive personal data (e.g. ethnicity, age, gender). You don't have to provide this data and we also provide a 'prefer not to say' option. We only use it at an aggregate level for reporting (e.g. equal opportunities monitoring).

Profiling

We know it's important to our supporters to use our resources in a responsible and cost-effective way. We may use profiling and targeting to help us understand our supporters and make sure that:

- Our communications (e.g. emails) and services (e.g. our website) are relevant, personalised and interesting to you
- our services meet the needs of our supporters
- we only ask for further support and help from you if it's appropriate
- we use our resources responsibly and keep our costs down

To do this we'll analyse how you interact with us (e.g. on our website, places you visit through use of data from membership card scanning, etc) and use

both geographic and demographic information to let you know what's happening in your local area and understand your interests.

We use specific tools to profile how you interact with us online, for example, Adobe Analytics, Google Analytics. Much of the information we collect is aggregated, however we may also collect some personal data for the use of personalising your experience, optimising our marketing campaigns, and to ensure the site is functioning as intended.

The personal information that is collect includes transactional information (i.e. order number) for Memberships, Donations, Renewals, Holidays Bookings and Online Shop Purchases.

If you've agreed that we can contact you for marketing purposes, we may also gather additional information about you from external sources, for example: updates to address and contact information, or publicly available information regarding your wealth, earnings and employment at an aggregate level. We may use this information to assess your capacity to support us and invite you to do so.

Recruitment and employment

In order to comply with our contractual, statutory, and management obligations and responsibilities, we process personal data, including 'sensitive' personal data, from job applicants and employees.

Such data can include, but isn't limited to, information relating to health, racial or ethnic origin, and criminal convictions. In certain circumstances, we may process personal data or sensitive personal data, without explicit consent. Further information on what data is collected and why it's processed is given below.

Contractual responsibilities: Our contractual responsibilities include those arising from the contract of employment. The data processed to meet contractual responsibilities includes, but is not limited to, data relating to: payroll, bank account, postal address, sick pay; leave, maternity pay, pension and emergency contacts.

Statutory responsibilities: Our statutory responsibilities are those imposed through law on the organisation as an employer. The data processed to meet statutory responsibilities includes, but is not limited to, data relating to: tax,

national insurance, statutory sick pay, statutory maternity pay, family leave, work permits, equal opportunities monitoring.

Management responsibilities: Our management responsibilities are those necessary for the organisational functioning of the organisation. The data processed to meet management responsibilities includes, but is not limited to, data relating to: recruitment and employment, training and development, absence, disciplinary matters, e-mail address and telephone number.

Sensitive personal data

The Act defines 'sensitive personal data' as information about racial or ethnic origin, political opinions, religious beliefs or other similar beliefs, trade union membership, physical or mental health, sexual life, and criminal allegations, proceedings or convictions.

In certain limited circumstances, we may legally collect and process sensitive personal data without requiring the explicit consent of an employee.

We will process data about an employee's health where it is necessary, for example, to record absence from work due to sickness, to pay statutory sick pay, to make appropriate referrals to the Occupational Health Service, and to make any necessary arrangements or adjustments to the workplace in the case of disability. This processing will not normally happen without the employee's knowledge and, where necessary, consent.

We will process data about, but not limited to, an employee's racial and ethnic origin, their sexual orientation or their religious beliefs only where they have volunteered such data and only for the purpose of monitoring and upholding our equal opportunities policies and related provisions.

Data about an employee's criminal convictions will be held as necessary.

Disclosure of employees personal data to other bodies

In order to carry out our contractual and management responsibilities, we may, from time to time, need to share an employee's personal data with one or more third party supplier.

To meet the employment contract, we are required to transfer an employee's personal data to third parties, for example, to pension providers and HM Revenue & Customs.

In order to fulfil our statutory responsibilities, we're required to give some of an employee's personal data to government departments or agencies e.g. provision of salary and tax data to HM Revenue & Customs.

Updating your data and marketing preferences

We want you to remain in control of your personal data. If, at any time, you want to update or amend your personal data or marketing preferences please contact us by writing to BBFO at the address at the end of this document, or by emailing info@bbfo.org.uk

Disclosure of members and Guests Personal Data

On occasion we will have to share personal data with third parties.

- We will share medical and other personal data with Medics from HMCG of the Welsh (air) Ambulance service in the case of a Medi-evac of a casualty from the island.
- We may share personal details with HMRC solely for the purposes of recovering tax on Gift Aid.
- Members' postal details are shared with our mailing house (for now Burwell Print), for the delivery of the Observatory's quarterly mailing of the Bardsey Beacon, AGM and other Observatory related news.
- Bank details are **only** shared with the banks of the individuals who set up standing orders.
- Ringing Data (required by The British Trust for Ornithology) will be passed to the BTO, but no personal data will be sent to any other third parties requesting ringing data.
- Colour ring sighting data will be passed to third parties, such as (but not exclusively) RSPB, NRW and BTO.
- Census data, including observers initials for rare and scarce species will be passed on to the BTO, County Recorders, The Welsh Records Panel and the British Birds Rarities Committee.
- Observers initials and names regarding sightings will be published in the annual report 'Bardsey's Wildlife'.

Otherwise, we will not share personal data with any other third party other than if we have a legal obligation to do so.

Retention of Personal Data

We will retain the personal details of cancelled and lapsed members for a period of 120 months in order to keep past members aware of special one-off events such as ten-year anniversary parties and events, as well as to provide a

period of grace for late renewals. The cancellation of Friends of Bardsey membership or Adopt-a-Manxie membership does not automatically cancel the delivery of BBFO promotional emails, where consent has been obtained by individuals for the Observatory to send these communications (see 'Consent' below). In this case, contact details will be retained until recipients unsubscribe from BBFO mailing lists, which can be done easily at any point.

Retention of Personal Data for unsuccessful applicants for job posts and volunteers

We will retain the personal details of unsuccessful applicants for a period of 48 months in order to keep them informed of potential posts, job or volunteer opportunities which may arise.

Personal Rights

You have a right to know all the personal details that we might hold on you. You can obtain a printed copy of this information by writing to BBFO at the address below or by sending an email request the email address below. If you have any questions in relation to this privacy policy or how we use your personal data contact info@bbfo.org.uk. We will reply within a maximum of two weeks of receipt of the request.

Consent

We require members and non-members to give specific consent to be contacted by email and telephone for the delivery of what are deemed promotional communications (Observatory news and events notices and offers).

Keeping your data secure

Sending information over the internet is generally not completely secure, and we can't guarantee the security of your data while it's in transit.

Any data you send is at your own risk.

We have procedures and security features in place to keep your data secure once we receive it.

Cookies and Tracking

Parts of our website and Blog (Bardsey's Wildlife) use cookies that help us monitor how the site is explored. Cookies are text files, not apps or programs and are completely anonymous. Your web browser will allow you to control how they are handled, and you may indicate that you do not wish them to be used. More information can be obtained at www.allaboutcookies.org

Links to other websites

Our website and blog contains links to third party websites that we think may be of interest. This information will be supplied in good faith but it is up to you If you do go to another website from this one, to read the privacy policy on that website to find out what it does with your information.

Following a link to BBFO sites from another website

If you come to BBFO.org.uk or BBFO.blogspot.com from another website, we may receive information from the other website. We don't use this data. You should read the privacy policy of the website you came from to find out more about this.

Use of geo-location data

We use geo-location on both our main website, and the Blog site. If you let your device share this information with us, we may use it to personalise your experience with us. Your device or web browser will usually prompt you when this is requested. You can change your location settings at any time in your device or computer settings.

Steven Stansfield
BBFO Data Protection Officer