

# **SEA Data Protection Policy**

Thanks to Allsorts, Brighton, for allowing us to use their policy as a template. We have consulted this webpage to assist us with this policy:

https://knowhow.ncvo.org.uk/organisation/operations/dataprotection

#### General

These procedures should be followed by trustees and members at all times in order to ensure compliance with the Data Protection Act 2018, to maintain the privacy of trustees, members and members of the public. Trustees are responsible for ensuring that SEA complies with this law.

From May 2018, new data protection regulations came into effect (GDPR). The NCVO name seven principles that GDPR is based on which guide how we manage data at SEA:

- Lawfulness, fairness and transparency
- Purpose limitation
- Data minimisation
- Accuracy
- Storage limitation
- Integrity and confidentiality (security)
- Accountability

## SEA needs to:

- have a clear policy about what data we hold on members and members of the public and why we hold that data
- be aware of increased rights to access data we hold about members and members of the public
- ensure personal data is held securely and never passed on to a Third Party without the consent of members and members of the public
- ensure the use we put that data to is compliant with the law and best practice

#### PERSONAL DATA SEA COLLECTS

SEA will only collect personal data that is deemed essential for SEA to know about our members and members of the public and which facilitates smooth communication between trustees and members and members of the public. Any information we hold for anyone is held on a strictly need to know basis.

We might hold the following information about members and members of the public:

- full name and date of birth
- postal address, email address and phone number

• current interests and activities insofar as they are relevant to members and members of the public's engagement with SEA.

We will also collect and hold information about:

- meetings members and members of the public who may have attended
- contact preferences
- details of correspondence sent to members and members of the public, or received from members and members of the public
- any other information provided by members and members of the public at the request of SEA and vice versa

#### WEBSITE

When members and members of the public access SEA's website we use traffic log cookies via Google Analytics to identify which pages are being used. Google Analytics collects information about visits which may include IP address, geographical location, browser type, referral source, length of visit and number of page etc. This helps us analyse data about web page traffic and improve our website in order to tailor it to users' needs. We only use this information for statistical analysis purposes only and it is stored by Google.

Overall, cookies help us to provide a better website, by enabling us to monitor which pages members and members of the public find useful and which they do not. A cookie in no way gives us access to computers or any information about the user, other than the data they have already chosen to share with us via their browser settings.

Most web browsers automatically accept cookies, but these can be modified to decline & delete cookie history if preferred.

Our website may contain links to other websites of interest. However, once members and members of the public have used these links to leave our site, they 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 they provide whilst visiting such sites and such sites are not governed by this privacy statement. They should exercise caution and look at the privacy statement applicable to the website in question.

## SENSITIVE PERSONAL INFORMATION (ALSO KNOWN AS SPECIAL CATEGORY DATA)

Sensitive Personal Information can include information about a person's health, race, ethnicity, political opinions, sexual activity for sexual health purposes, sexual orientation or religious beliefs. Sometimes we collect this data because members and members of the public are participating in an event or project where that information is relevant.

All such information about members and members of the public is treated with care and anything sensitive will be treated with extra care and confidentiality and always in accordance with this Privacy Policy.

We will not pass on details to anyone else without permission except in exceptional circumstances such as anyone reporting serious self-harm or posing a threat to others or children contacting us and sharing serious issues such as physical abuse or exploitation.

## WHAT WE WILL DO WITH YOUR DATA

When we ask members and members of the public to provide personal information we will let them know why we are asking, and how we will use that data, by directing them towards this notice. Depending on their relationship with SEA, and the preferences they have indicated, data we hold

may be used by us to send them promotional, marketing or fundraising information by post or electronic means. These types of communications can include:

- informing them of opportunities, activities, projects or events related to SEA
- news and updates about SEA and e-newsletters if they have signed up to receive them
- information about our fundraising activities, including occasional targeted requests to consider giving financial support to SEA, or to ask them to consider supporting us in other ways
- dealing with enquiries and other relevant communications based upon their relationship with SEA.

## LAWFUL BASIS FOR USING YOUR INFORMATION

There are lawful reasons that allow us to process personal information and one of those is called 'legitimate interests'. This means that SEA may have a 'legitimate interest' in processing information. Whenever we process Personal Information under the 'legitimate interest' lawful basis we make sure we take into account members and members of the public's rights and interests and balance those against our 'legitimate interest'.

## LAWFULLY SHARING YOUR INFORMATION

We may disclose information about members and members of the public in the following circumstances:

- if we are required to do so by law (for example, a safeguarding concern)
- in connection with any legal proceedings or prospective legal proceedings
- in order to establish, exercise or defend our legal rights (including providing information to others for the purposes of fraud prevention and reducing credit risk)

## **SECURITY OF PERSONAL DATA**

We will take reasonable technical and organisational precautions to prevent the loss, misuse or alteration of personal information. Data will be stored securely in locked filing cabinets and electronically in password protected files and data bases. We also store all the personal information provided on our secure password - and firewall - protected servers. Data transmission over the internet is inherently insecure, and we cannot guarantee the security of data sent over the internet. However, we will encrypt data transmission using strong encryption where possible. We are committed to protecting the privacy and the security of the data provided to us. SEA regularly reviews processes and procedures to ensure we are up to date with the latest security practices and holds all data in line with GDPR.

### **HOW LONG WILL WE KEEP DATA?**

We keep data for as long as members and members of the public are active participants in our activities. If an individual has had no contact with us for over a year, we will delete their details from our data bases.

### **RIGHTS**

We do not give out, sell or trade our mailing list data with third parties. The information provided to us will be used to enable us to be in touch with members and members of the public. If at any time members and members of the public no longer wish to receive communications from us or for any other query, they can contact us at: hello@seafuture.org. You can also make a complaint to the data protection supervisory authority, the Information Commissioner's Office, <a href="https://ico.org.uk/">https://ico.org.uk/</a>

## Access to personal information

Members and members of the public have the right to request access to a copy of the personal

information that we hold, along with information on what personal information we use, why we use it, who we share it with and how long we keep it for. Members and members of the public can make a request for access free of charge. Requests for access must be in writing, and accompanied by evidence of identity.

# Right to object

Members and members of the public can object to our processing of personal information where we are relying on a legitimate interest (or those of a third party) and there is something about a particular situation which makes them want to object to processing on this ground. They also have the right to object where we are processing personal information for direct marketing purposes. We can be contacted as above, providing details of your objection and proof of identity.

## Consent

If members and members of the public have given us consent to use personal information (for example, for marketing), it can be withdrawn at any time.

#### Rectification

Members and members of the public can ask us to change or complete any inaccurate or incomplete personal information held.

#### **Erasure**

Members and members of the public can ask us to delete personal information where it is no longer necessary for us to use it, or if they have withdrawn consent, or where we have no lawful basis for keeping it.

#### **Portability**

Members and members of the public can ask us to provide them or a third party with some of the personal information that we hold about them in a structured, commonly used, electronic form, so it can be easily transferred.

## Restriction

Members and members of the public can ask us to restrict the personal information we use about them where they have asked for it to be erased or where they have objected to our use of it.