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## Privacy Notice: Friends of Horsey Seals (FoHS)

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Registered Charity 1169539

It is important to us that you understand and are happy with how we use your information. Please take time to read this Privacy Notice in full.

### 1. Who are we?



Friends of Horsey Seals (FoHS) was created in 2011 to take over the management of a project formed by Natural England and the Broads Authority in 2003. Its purpose was to protect a small colony of Atlantic grey seals on Horsey beach from human interference. It recruited its own team of local volunteers to help, but in 2011 the funding dried up.

Some of those early helpers, including Peter Ansell and Albert Ward and others, felt strongly that the work should continue. When asked, they agreed to take on the project. The number

of births by that time had reached around 500 pups. FoHS boosted the number of original volunteer wardens and introduced formal training for them. It proved a good decision. The number of pups being born at Horsey and more recently at Winterton has been steadily increasing ever since. The breeding season soon became something of a tourist attraction partly because the area was so accessible by road. These trained wardens now make a real difference, not only to the safety of the seal colony but also by creating a positive experience for the people who came to see them. The FoHS seal rescue team trained by the RSPCA has had a considerable positive impact of sick and injured seals. It still operates seven days a week.

in 2016 FoHS became a registered charity (1169539).

Since then, the organisation has continued to expand in response to the growing size of the seal colony through the generosity and involvement of the community and hundreds of volunteers who give up their free time to warden. We can only do what we do because of the subscriptions from the Friends scheme, our donors and sponsors. Local businesses help us acquire equipment and other essential items, landowners give us access and additional help and we work alongside partner agencies.

The seal colony now spreads from Waxham to Winterton. In recent seasons 2,500 births have been recorded, breaking all previous records and the colony continues to grow.

## 2. We are committed to your privacy

This policy explains our commitment to protecting your privacy and security and how and why we use your personal data so you are informed and in control of your information.

Our policy applies to Friends, volunteers and members of the public and professional contacts.

We may make references to Friends of Horsey Seals as FoHS or our Charity or the Charity or us or we

We use three key definitions to describe people mentioned in this policy. These are definitions used by the Information Commissioner's Office (ICO), the UK's independent body set up to uphold information rights ([www.ico.org.uk](http://www.ico.org.uk))

- 'Data subject': this is you, the individual whose data we may hold and we respect your right to control your data.
- 'Data controller': this is us, Friends of Horsey Seals. With your permission, we determine why and how your personal data is used (as outlined in this policy).

- ‘Data processor’: this is a person, or organisation, who processes your data on our behalf. For example, this might be a mailing house who sends your membership magazine to you for us or the shredding company which destroys unwanted paperwork when required. In all cases such data transfers are via secure means and with a Data Processor Agreement in place where applicable.

Any third parties such as those above that we work with at no point ‘own’ your data, so you will never hear from them independently and they will always delete your data from their systems when they have completed any task in hand.

We will never sell your personal data.

Instances when we would securely share personal data with third parties:

- Data may only be shared with another third party for the Charity to comply with a legal duty. In such cases we will notify you of our actions wherever possible.
- With your consent. This may be the case in collaborative projects, or collecting data for fundraising projects.
- The data sharing will always be clearly and transparently communicated to anyone participating in the project so that consent may be freely given.

### 3. Why do we collect your personal data?

We use your personal data to provide our services and keep in touch with you. We will only ever collect, store and use your personal data when we have an identified reason to do so.

The ICO explains a ‘lawful basis’ as:

- Contractual: making sure you get your membership benefits is an example of such a “contract.”
- To comply with a legal duty;
- To protect your vital interests;
- For our own (or a legitimate third party’s) lawful interests, provided your rights don’t override these.

We will only ever use your information for the purpose or purposes it was collected for.

#### 1) FRIENDS.

We collect your personal data to administer your membership, which may involve:

- Welcoming you when you become a member of our scheme.

- Processing your Direct Debit subscription payments, if you have arranged this with us
- Sending you annual membership renewal information
- Getting in touch with you should there ever be any issues processing your subscription payment

#### Adult or multiple adult memberships

Membership of FoHS covers all members of the household. We will address any communications to the primary adult listed on the membership. If you wish to update this at any point, please let us know.

#### Membership Benefits

We will contact you with a password for access to the Friends only section of our website which you will then change to one of your own.

#### When your membership has ended

Unless we hear from you directly, after your expiry date we may continue to send you our usual regular information about our work for up to 2 months after your membership has ended. This is to give you and us time to process your renewal in case it is delayed for any reason, or in case your support was cancelled accidentally.

This membership administration has the lawful basis of being 'contractual.'



## 2) WARDENS.

We collect your personal data to send or provide you with:

- i) A password to gain access to the Warden's Three Rings on-line rota and communications system, a secure third party platform.
- ii) Contact you by email about matters affecting all volunteer wardens
- iii) send you Information about FoHS social events

This has the lawful basis of being 'contractual'.

## 3) FRIENDS & OTHER FINANCIAL SUPPORTERS.

We collect your personal data so that we can send you information about our work that we feel will be of interest to you.

This may include information about:

- our charity, campaigns and conservation work:
- our role in educating the public about the conservation of the seal colony:
- volunteering opportunities and how you can help protect the seals especially during the pupping season:
- appeals and fundraising:
- events and activities such as talks and walks:
- campaigns:
- taking part in specific projects:

This information is in addition to sections a-c above and is defined as 'direct marketing' by the ICO.

We use two different lawful bases for processing your data for 'direct marketing' purposes:

### i) Legitimate interest

This is where we have identified a legitimate reason for contacting you, which still does not override your rights or interests. It applies to:

All Friends: We will post our quarterly newsletter and other Friends only material on our website. We will send any other communications via email, unless you request us to stop

Any long-standing supporters or donors: Those who first supported us using 'opt-out' style consent forms: We will continue to send you any items, such as fundraising appeals, from

which you have not opted-out so that you continue to receive the same service as you have always done.

#### ii) Opt-in consent

This is where you have given us express permission to contact you by particular communication channels.

It applies to: All new Friends, Wardens and donors since 2016, and anyone updating their preferences since 2018: You will have been asked to actively opt-in to direct communications that you wish to receive. This includes stand-alone communication about events, appeals, and campaigns such as volunteer recruitment or petitions.

We use opt-in consent to send you the information listed above by email, or as per your preferences.

#### Segmentation

For some fundraising appeal campaigns, events invitations and volunteer campaigns, we will only distribute mailings directly to those supporters who either contacted us or have shown interest in the past.

#### Amending your marketing preferences

You can update the ways we get in touch with you at any time. Please visit [www.friendsofhorseyseals.co.uk](http://www.friendsofhorseyseals.co.uk) for our address or email [admin@friendsofhorseyseals.co.uk](mailto:admin@friendsofhorseyseals.co.uk).

#### 4) VOLUNTEERS.

To enable you to volunteer with us we collect your personal data so that we can keep in touch with you about:

- changes to planned volunteer work programmes that you may be taking part in
- dedicated volunteer thank-you events and training opportunities
- current campaigns and engagement which you may wish to get involved with
- the positive impact you have on our work, by sending you our quarterly volunteer newsletters

As defined by the ICO, the lawful basis for processing your data for these purposes is 'contractual' (where administering your volunteer record) and 'legitimate interest' (when sending you information about our work and wider campaigns and engagement).

#### 5) OTHER CONTACTS WHO WE COMMUNICATE WITH ON A REGULAR OR ONE-OFF BASIS.

We also collect and use the personal data of individuals who:

- Are land owners;
- Are other environmental organisations who we partner with and consult i.e. Natural England, the Broads Authority, Norfolk Coastal Partnership, Norfolk Wildlife Trust
- Visit the sites that we warden and complete a feedback survey;
- Are volunteer applicants;
- Make enquiries or submit information to our Charity or photograph gallery;
- May have contact with us for a one-off reason such as a complaint or accident reporting or injury.

We will only send you information which we believe is relevant to you. As defined by the ICO, the lawful basis for processing your data for these purposes is usually 'contractual' but may vary depending on the nature of your engagement with us.

#### 6) MEDIA CONTACTS AND BUSINESSES THAT SUPPORT US.

We also collect details of selected companies and organisations for the purposes of disseminating information and press releases, This information may include details of companies with whom we already have been in communication with in the past, or be taken from sources in the public domain.

In some cases, this information is also provided directly to us by contacts wishing to join our Friends of Horsey Seals mailing list.

This activity is defined as 'direct marketing' by the ICO.

In carrying this out, we adhere to the principles of GDPR and, in the case of email or telephone contact, the Privacy and Electronic Communications Regulations (PECR). The UK GDPR applies wherever you are processing 'personal data'. This means if you can identify an individual either directly or indirectly, the UK GDPR will apply - even if they are acting in a professional capacity. So, for example, if you have the name and number of a business contact on file, or their email address identifies them (eg [initials.lastname@company.com](mailto:initials.lastname@company.com)), the UK GDPR will apply.

As defined by the ICO, the lawful basis for processing organisations' data for these purposes is 'legitimate interest.' As per the law, sole traders will only receive marketing information by email if opt-in consent has been given.

In all cases, you can opt out and we will keep a suppression list to ensure we do not contact you again.

#### 7) COMMUNITY GROUPS & OTHER CHARITIES.

We also collect details of community groups, parish councils and other charities with whom we wish to collaborate. This information may be given to us by individuals representing these groups, or be taken from sources in the public domain where we feel that these groups would be interested to hear from us for mutual benefit.

This activity is defined as 'direct marketing' by the ICO.

As defined by the ICO, the lawful basis for processing organisations' data for these purposes is 'legitimate interest.'

In all cases, you can opt out and we will keep a suppression list to ensure we do not contact you again.

## 4. What type of personal data do we collect and how do we collect it?

### 1) BASIC INFORMATION

- i) We will collect basic information about you, including your name, postal address, telephone number and email address.
- ii) If you wish us to collect a card payment or Direct Debit payments, or if we are paying you for a service, we will also collect your banking details.
- iii) We collect this data from you directly. Sometimes this is in person; other times, it is over the telephone, in writing or through an online form.

### 2) GETTING TO KNOW YOU BETTER

We also collect information about you that helps us to get to know you better. This may include:

- i) information we might ask you for via surveys:
- ii) records of donations you've made towards our fundraising appeals
- iii) your preferences of how you would like us to contact you
- iv) ways you've helped us through volunteering your time
- v) records of events you've attended, or campaigns or activities that you've been involved in

If we do so, we will be very clear as to why we are collecting such information, and we will only do so with your specific permission.

### Internal data analysis

We analyse data from our supporters, donors and volunteers, to determine the success of campaigns and appeals, better understand behaviour and responses and identify patterns and trends. This helps inform our work and makes the Charity a stronger and more effective

organisation. Understanding our supporters, their interests and what they care about also helps us provide a better experience e.g., through more relevant communications.

FoHS complies with relevant legislation to protect the rights of the individual including how we handle our donors' data; and is aware of the particular rights of vulnerable adults in relation to individual giving.

#### Due diligence in researching individuals

##### i. Internal data analysis

We analyse data from our supporters, donors and volunteers to determine the success of campaigns and appeals to help us better understand our supporters, identify trends and to help us determine what is most important to them in our work. By doing so, we will provide a better experience e.g., through more relevant communications.

##### ii. FoHS promise:

- will never use unethical methods to obtain prospect research information
- will avoid personal prejudice and bias
- accepts responsibility for our actions within the fundraising process
- is honest and transparent regarding purpose and their identity
- will comply with legislation including GDPR as to the data held.

##### iii) Anonymised data

We may combine and anonymise personal data so that it can no longer be linked to any particular person. This information can be used for a variety of purposes, such as help recruiting new supporters, or to identify trends or patterns within our existing supporter base. This information helps inform our actions and improve our campaigns.

#### Appropriate due diligence policies

FoHS Trustees are responsible for assessing and managing risks to their charity's activities, work and reputation.

Money Laundering and adverse publicity about a donor are examples of how a charity could be exposed to criminal liability and suffer reputational damage via a potential donation or donor that could cause a risk to the Charity and its reputation.

### 3) SENSITIVE PERSONAL DATA

Normally we do not collect or store sensitive personal data about supporters and members (such as information relating to race and ethnicity, health, beliefs or political affiliation)

However, there are some situations where this will occur. When we do so, we will be very clear as to why we are collecting such information, and we will only do so with your specific consent and permission. In these situations, we collect the data from you directly.

If you are a volunteer then we may collect extra information about you, for example:

- details of emergency contacts
- medical conditions

We may also collect sensitive personal data if you have an accident while wardening. This information will be retained for legal reasons, for safeguarding purposes and to protect us (including in the event of an insurance or legal claim). If this does occur, we'll take extra care to ensure your privacy rights are protected.

#### 4) CHILDREN.

Some of our services are aimed specifically at young people (for example our school talks or school visits to the seal colony). To deliver these services safely we need to collect data.

In line with data protection law, we will not collect, store, or process young person's personal details if they are under 13 years of age; unless we have the express permission from their parent or guardian to do so.

We won't use young people's personal data for marketing purposes, and we won't profile it.

Children who attend our events must be accompanied by an adult.

Photographs: If your child is under 18 then we'll need permission from you as their parent or guardian for them to be included in a photograph to be used by the Trust for marketing purposes.

Our FoHS Safeguarding Children and Young People Policy are available on request. Please contact us if you wish to see it.

#### 5) COOKIES ON OUR WEBSITE.

Our website uses 'cookies' to help provide you with the best experience we can. A cookie is a small file that asks permission to be placed on your computer or mobile device. If 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 cookies on the FoHS website help to:

- Make our website work as you'd expect
- Remember your settings during and between visits

- Improve the speed/security of the site
- Allow you to share pages with social networks like Facebook
- Continuously improve our website for you

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 our website.

## 6) THIRD PARTIES.

We never buy contact details from any third party.

Independent third parties may share your information with us when you have indicated that you wish to support the Charity with your consent (for example, Justgiving). You should check their Privacy Policy when you provide your information to understand fully how they will process your data.

We may collect information from social media where you have given us permission to do so, or if you post on one of our social media pages.

## 5. How do we store your data?

### 1. SECURITY

All of the personal data we use is processed and stored by our third party UK based providers, The Charity Aid Foundation for subscriptions and donations and Three Rings CIC for warden rotas, directory and communications. It is possible that for the purposes of IT hosting and maintenance your information may be situated outside of the European Economic Area (EEA). This will be done in accordance with guidance issued by the Information Commissioner's Office.

All FoHS electronic data and databases are stored on secure computer systems and we control who has access to information.

### 2. PAYMENT SECURITY

All electronic Friends of Horsey Seal forms that request financial data will use the Secure Sockets Layer (SSL) protocol to encrypt the data between your browser and our servers.

If you use a credit or debit card to donate or purchase a Friends membership online, the Charity Aid Foundation (CAF) who handle all our subscriptions and donations will pass your card details securely to your chosen payment provider.

FoHS complies with the payment card industry data security standard (PCI-DSS) published by the PCI Security Standards Council.

FoHS cannot guarantee the security of your home computer or the internet, and any online communications must be made with care, especially information provided by email or online. If using a website or email always check that the URL and that the email address is correct especially if the communication is incoming. Any online communication made to us is at sender's own risk.

### 3. DATA RETENTION POLICY

We will only use and store information for as long as it is required for the purposes it was collected for. What information we hold will be reviewed regularly and we will delete what is no longer required.

## 6. Your rights



We respect your right to control your data. Your rights include:

#### 1) THE RIGHT TO BE INFORMED

This privacy notice outlines how we capture, store and use your data. If you have any questions about any elements of this policy, please contact us.

#### 2) THE RIGHT OF ACCESS

If you wish to obtain a record of the personal data we hold about you, through a Subject

Access Request, we will respond within one month.

### 3) THE RIGHT TO RECTIFICATION

If we have captured information about you that is inaccurate or incomplete, we will update it.

### 4) THE RIGHT TO ERASE

You can ask us to remove or randomise your personal details from our records.

### 5) THE RIGHT TO RESTRICT PROCESSING

You can ask us to stop using your personal data.

### 6) THE RIGHT TO DATA PORTABILITY

You can ask to obtain your personal data from us for your own purposes.

### 7) THE RIGHT TO OBJECT

You can ask to be excluded from any communications from us.

## 7. Making a complaint

Friends of Horsey Seals is a Charity is a small charity that does a big job and while in good faith we do our best, there are times when we are unable to meet the high standards we aspire to. If this occurs, we want to hear about it so we can deal with the situation as quickly as possible and put any necessary measures in place to stop it happening again.

We take complaints very seriously and we treat them as an opportunity to learn and improve what we do and how we do it. So we are always grateful to hear from people who are willing to take the time to let us know about what we could do better.

#### Confidentiality

All complaint reports will be handled sensitively and in line with relevant data protection requirements.

#### Responsibility

Overall responsibility for how we handle complaints and remedy them lies with our Board of Trustees.

#### The Regulator: Information Commissioner's Office

For further assistance with complaints regarding your data, please contact the Information Commissioner's Office, whose remit covers the UK.

Information Commissioner's Office

Wycliffe House

Water Lane

Wilmslow

SK9 5AF

Telephone: 0303 123 1113

Email: [casework@ico.org.uk](mailto:casework@ico.org.uk)

## 8. Leaving our website for another

Please be aware we are not responsible for the privacy practices, or the content of any other websites linked to our website. If you followed a link from this website to another website, you need to be aware that you may be supplying information to a third party. In our case we work with the Charities Aid Foundation and Three Rings Cic who have elevated levels of security on their sites to give you added protection. They also have extensive Privacy Policies of their own which you can view when you log or link into them.

## 9. Get in touch

If you want to find out more about the information we hold about you, or about our privacy policy, please contact us:

Post: FoHS Data Protection

c/o 2 Chapel Cottages

Back Lane

Rollesby

Norfolk

NR29 5EB

Telephone: 01692 631254

Email: [Admin@friendsofhorseyseals.co.uk](mailto:Admin@friendsofhorseyseals.co.uk)

We will update this policy periodically.

Last updated: July 2021