

# **Biodynamic Land Trust Privacy Policy**

### **BACKGROUND:**

References to "we", "us" or "our" in this privacy policy are references to the Biodynamic Land Trust, a registered Community Benefit Society No 31448R and a registered exempt Charity No XT33649. Our registered address is Painswick Inn, Gloucester Street, Stroud, Gloucestershire GL5 1QG; email address: info@biodynamiclandtrust.org.uk; telephone number: 01453 367233; website: www.biodynamiclandtrust.org.uk.

We understand that your privacy is important to you and that you care about how your personal data is used. We are committed to protecting your privacy and personal data.

This Privacy Policy sets out how we collect and use personal data about you. We will only collect and use personal data in ways that are described here, and in a way that is consistent with our obligations and your rights under the law.

Please read this Privacy Policy carefully and ensure that you understand it.

By contacting us, using our services, or accessing our website you agree to be bound by this Privacy Policy.

#### 1. What is Personal Data?

Personal data is defined by the General Data Protection Regulation (EU Regulation 2016/679) (the "GDPR") as 'any information relating to an identifiable person who can be directly or indirectly identified in particular by reference to an identifier'.

Personal data is, in simpler terms, any information about you that enables you to be identified. Personal data covers obvious information such as your name and contact details, but it also covers less obvious information such as identification numbers, electronic location data, and other online identifiers.

# 2. What Are My Rights?

Under the GDPR, you have the following rights, which we will always work to uphold:

- a) The right to be informed about our collection and use of your personal data. This Privacy Policy should tell you everything you need to know, but you can always contact us to find out more or to ask any questions using the details in Part 13.
- b) The right to access the personal data we hold about you. Part 10 will tell you how to do this.
- c) The right to have your personal data rectified if any of your personal data held by us is inaccurate or incomplete. Please contact us using the details in Part 13 to find out more.
- d) The right to be forgotten, i.e. the right to ask us to delete or otherwise

dispose of any of your personal data that we have. Please contact us using the details in Part 13 to find out more.

- e) The right to restrict (i.e. prevent) the processing of your personal data.
- f) The right to object to us using your personal data for a particular purpose or purposes.
- g) The right to data portability. This means that, if you have provided personal data to us directly, we are using it with your consent or for the performance of a contract, and that data is processed using automated means, you can ask us for a copy of that personal data to re-use with another service or business in many cases.

For more information about our use of your personal data or exercising your rights as outlined above, please contact us using the details provided in Part 13.

Further information about your rights can also be obtained from the Information Commissioner's Office or your local Citizens Advice Bureau.

#### 3. What Data Do We Collect?

Depending upon your interaction with us, we may collect some or all of the following personal and non-personal data (please also see Part 11 on Cookies and Part 12 on our use of Cookies and similar technologies and our Cookie Policy):

- Name;
- Gender;
- Address;
- Telephone numbers;
- Email address;
- Anonymous information regarding which pages of our website are accessed and when.

### 4. How Do You Use My Personal Data?

Under the GDPR, we must always have a lawful basis for using personal data. We may use your information to:

- process a donation or share purchase that you have made;
- to carry out our obligations arising from any contracts entered into by you and us, eg joining as a member;
- seek your views or comments on the work we carry out and services we provide;
- notify you of changes to the work we carry out and our services;
- send you communications which you have requested and that may be of
  interest to you. These may include information about our work and projects,
  appeals or updates about our associated biodynamic organisations' work and
  activities.
- process a job application.

Supplying you with information by email and/or post that you have opted-in to (you may unsubscribe or opt-out at any time by contacting the Biodynamic Land Trust by email to info@biodynamiclandtrust.org.uk or by post to Biodynamic Land Trust, Painswick Inn, Gloucester Street, Stroud, GL5 1QG)

With your permission and/or where permitted by law, we may also use your personal data for marketing purposes, which may include contacting you by email AND/OR telephone AND/OR post with information and news regarding our work. You will not be sent any unlawful marketing or spam. We will always work to fully protect your rights and comply with our obligations under the GDPR and the Privacy and Electronic Communications (EC Directive) Regulations 2003, and you will always have the opportunity to opt-out.

Any Third Parties whose content appears on Our Site may use third-party Cookies, as detailed below in Parts 11 and 12. Please refer to Part 12 for more information on controlling cookies. Please note that we do not control the activities of such third parties, nor the data that they collect and use themselves, and we advise you to check the privacy policies of any such third parties.

When using the secure online share purchase or donation pages on our website, your donation is processed by a third party payment processor, "Stripe" who specialises in the secure online capture and processing of credit/debit card transactions. If you have any questions regarding secure transactions, please contact us.

When you subscribe to our quarterly newsletter we use a third-party provider, MailChimp, to deliver this. We gather statistics around email opening and clicks using industry standard technologies to help us monitor and improve our e-newsletter. For more information, please see <a href="MailChimp's privacy notice"><u>MailChimp's privacy notice</u></a>

You can unsubscribe from our newsletter mailings at any time by clicking the unsubscribe link at the bottom of any of the newsletter emails or by contacting us and asking to be removed.

# 5. How Long Will You Keep My Personal Data?

We will not keep your personal data for any longer than is necessary in light of the reason(s) for which it was first collected. Your personal data will therefore be kept for the following periods (or, where there is no fixed period, the following factors will be used to determine how long it is kept):

- All data will be held for the period of time:
  - that you are a member;
  - for a maximum of five years after you have ceased being a member, have donated funds or had a loan refunded;
  - until you unsubscribe from our newsletter.

### 6. How and Where Do You Store or Transfer My Personal Data?

We will only store or transfer your personal data in the UK. This means that it will be fully protected under the GDPR.

The security of your personal data is essential to us, and to protect your data, we take a number of important measures, including the following:

- Staff training;
- Secure passwords;
- Locked cupboards/drawers for hard copy data;
- Secure server with backups held offsite.

# 7. Do You Share My Personal Data?

We will not share any of your personal data with any third parties for any purposes, subject to one important exception.

In some limited circumstances, we may be legally required to share certain personal data, which might include yours, if we are involved in legal proceedings or complying with legal obligations, a court order, or the instructions of a government authority.

### 8. How Can I Control My Personal Data?

In addition to your rights under the GDPR, set out in Part 2, when you submit personal data we aim to give you strong controls on our use of your data for direct marketing purposes (including the ability to opt-out of receiving emails from us which you may do by replying to emails asking to be removed from this method of contact for marketing). You can also advise us at the point of providing your details initially to us either by email, telephone or in person at our first meeting that you do not wish to be contacted by us by email, telephone, text message or by letter offering marketing services.

You may also wish to sign up to one or more of the preference services operating in the UK: The Telephone Preference Service ("the TPS"), the Corporate Telephone Preference Service ("the CTPS"), and the Mailing Preference Service ("the MPS"). These may help to prevent you receiving unsolicited marketing. Please note, however, that these services will not prevent you from receiving marketing communications that you have consented to receiving.

#### 9. Can I Withhold Information?

You may access our website without providing any personal data at all. However, to use some features and functions available on our website you may be required to submit or allow for the collection of certain data.

### 10. How Can I Access My Personal Data?

If you want to know what personal data we have about you, you can ask us for details of that personal data and for a copy of it (where any such personal data is held). This is known as a "subject access request".

All subject access requests should be made in writing and sent to the email or postal addresses shown in Part 13.

There is not normally any charge for a subject access request. If your request is 'manifestly unfounded or excessive' (for example, if you make repetitive requests) a fee may be charged to cover our administrative costs in responding.

We will respond to your subject access request within one month of receiving it. Normally, we aim to provide a complete response, including a copy of your personal data within that time. In some cases, however, particularly if your request is more complex, more time may be required up to a maximum of three months from the date we receive your request. You will be kept fully informed of our progress.

#### 11. Cookies

In this Policy the following terms shall have the following meanings:

"Cookie" means a small text file placed on your computer

or device by our website when you visit certain parts of our website and/or when you use certain features of our website. Details of the Cookies used by our

website are set out in Part 12, below; and

"Cookie Law" means the relevant parts of the Privacy and Electronic

Communications (EC Directive) Regulations 2003;

#### 12. How Do You Use Cookies?

Our website may place and access certain first-party Cookies on your computer or device. First-party Cookies are those placed directly by us and are used only by us. We use Cookies to facilitate and improve your experience of Our Site and to provide and improve our services. We have carefully chosen these Cookies and have taken steps to ensure that your privacy and personal data is protected and respected at all times.

Third-party cookies are those placed by websites, services, and/or parties other than us. These cookies are not integral to the functioning of a site and your use and experience of a site will not be impaired by refusing consent to them. We are not responsible for cookies set by external sites and you would need to consult any such sites for more information about their cookies.

All Cookies used by and on our website are used in accordance with current Cookie Law.

Before Cookies are placed on your computer or device, you will be shown a pop up requesting your consent to set those Cookies. By giving your consent to the placing of Cookies you are enabling us to provide the best possible experience and service to you. You may, if you wish, deny consent to the placing of Cookies; however certain features of our website may not function fully or as intended.

Certain features of our website depend on Cookies to function. Cookie Law deems these Cookies to be "strictly necessary". Your consent will not be sought to place these Cookies, but it is still important that you are aware of them. You may still block these Cookies by changing your internet browser's settings, but please be aware that our website may not work properly if you do so. We have taken great care to ensure that your privacy is not at risk by allowing them.

In addition to the controls that we provide, you can choose to enable or disable

Cookies in your internet browser. Most internet browsers also enable you to choose whether you wish to disable all Cookies or only third-party Cookies. By default, most internet browsers accept Cookies, but this can be changed. For further details, please consult the help menu in your internet browser or the documentation that came with your device.

You can choose to delete Cookies on your computer or device at any time, however you may lose any information that enables you to access our website more quickly and efficiently including, but not limited to, login and personalisation settings.

It is recommended that you keep your internet browser and operating system up-todate and that you consult the help and guidance provided by the developer of your internet browser and manufacturer of your computer or device if you are unsure about adjusting your privacy settings.

### 13. How Do I Contact You?

To contact us about anything to do with your personal data and data protection, including to make a subject access request, please use the following details:

Telephone number: 01453 367233 Email: info@biodynamiclandtrust.org.uk

Postal Address: Biodynamic Land Trust, Painswick Inn, Gloucester Street, Stroud,

Gloucestershire, GL5 1QG

# 14. Changes to this Privacy Policy

We may change this Privacy Notice from time to time. This may be necessary, for example, if the law changes, or if we change our business in a way that affects personal data protection.

Any changes will be immediately posted on our website. We recommend that you check our website regularly to keep up-to-date.