## GREEN INVESTMENT GREATER LINCOLNSHIRE PRIVACY POLICY

### Updated 2 March 2023

## Green Investment Greater Lincolnshire

Green Investment Greater Lincolnshire (GIGL) is hosted by Lincolnshire Wildlife Trust whose registered office is Banovallum House, Manor House Street, Horncastle, Lincs LN9 5HF and is registered with the Information Commissioners Office (ICO) as a Data Controller (registration ref: Z2227661). The data protection officer for Lincolnshire Wildlife Trust is Paul Learoyd, Chief Executive. For GIGL, the co-ordinating officer working with the name data protection officer is Tammy Marie Smalley, Head of Conservation at Lincolnshire Wildlife Trust.

We use your personal information as defined in the Data Protection Act 1998 ("Information") in accordance with all relevant data protection legislation including the Data Protection Act 1998. We will also ensure all our data protection procedures are fully compliant with the procedures set out in the EU General Data Protection Regulation (GDPR) which came into force on 25<sup>th</sup> May 2018.

As a Data Controller, Lincolnshire Wildlife Trust is committed to ensuring that your privacy is protected. This privacy policy explains how we use the information we collect about you, how you can instruct us if you prefer to limit the use of that information, and the procedures that we have in place to safeguard your privacy.

## Information covered by this Policy

This privacy policy applies to the use and processing of personal information collected and used by GIGL, the GIGL website and Data Processors formally contracted by GIGL. Other organisations/companies' that may be accessed via links on the GIGL website or which provide services under their own terms and conditions, are not covered by this policy. Consequently, we encourage you to read the Privacy Policies of any service provider or third-party websites when entering their domain(s).

Personal information is information, or any combination of separate pieces of information, that could be used to identify you. When you submit your personal details to us as described below you will be deemed to consent to its use by us in the ways indicated below.

## **Information Security**

GIGL is committed to protecting the privacy of our users and protecting their personal information, and supports the Data Protection Act in spirit and word. As part of Lincolnshire Wildlife Trust, we have implemented technical, administrative and physical procedures designed to protect personal information from loss, misuse or alteration.

The personal information we collect from you is only that which is required by us to provide you with the information, products and/or services you have requested.

We store personal information on secure servers with access limited to authorised personnel, or on paper files which are kept in our secure offices.

We may also store your information on cloud-based computing servers, providing they are compliant with the GDPR (for example, Google Workspace). Access to your data on the cloud will be restricted to users approved by the GIGL Data Protection Officer. These users must be either an employee of Lincolnshire Wildlife Trust or a contractor with specific Data Processor conditions in their contract. The security controls for user log-in to cloud-based services will require two-factor authentication.

## Personal Information – What is collected and how?

We collect and process the following information when you contact us:

• Personal identifiers, contacts, and characteristics (for example, name, phone, email and address details)

We may also collect and process:

- Website user stats via online identifiers (for example, IP address) when you visit the GIGL website; and
- Photographs from events and site visits in which you may be identifiable.

If you express an interest to take part in a GIGL market event, we may also request further details about you, such as details about your business, your SBI number and your preferences regarding participation in the market event.

We may also obtain information about you from other sources, including publicly available sources, such as the Land Registry or the Rural Payments Agency.

## Personal Information – Why is it collected?

Under the UK GDPR, the lawful basis we rely on for processing your data for the purposes described in this Policy is Legitimate Interest.

We will seek consent from you if we need to process your data for other identified purposes. To ensure meaningful consent is obtained from you, GIGL will provide you with reasonable notice ensuring that your consent is provided on an informed basis.

## Personal Information – How will it be used?

The information collected is required for several reasons including:

- i) to allow us to contact you to provide services requested,
- ii) to customise the content of our website to meet your specific needs,
- iii) to keep you up to date with developments in the GIGL project, and
- iv) to inform you about additional projects and events linked to GIGL that you may find of interest.

## Personal Information – Who will it be shared with?

We will not share your data with anyone for marketing purposes.

There may be other occasions where GIGL is obliged to share your information such as:

- when required by law and/or government or regulatory authorities.
- to contract with appropriate third-party companies to assist us in gathering and delivering appropriate information in order for us to carry out our legitimate interests.
  - These third parties will act as our Data Processors and we will contract with them to ensure that their requirements and responsibilities under the General Data Protection Regulations (GDPR) are clearly agreed, especially with regard to their own privacy policies and data security measures.

## Personal Information Retention Period

We will retain personal information for the period necessary to fulfil the purposes outlined in this Privacy Policy, unless a longer retention period is required or permitted by law. The information we use for marketing purposes will be kept by us until you notify us that you no longer wish to receive this information.

## Individuals' Rights under GDPR

The GDPR creates some new rights for individuals, and strengthens some of the rights that currently exist. An individual's rights under GDPR are:

- 1. The right to be informed
- 2. The right of access
- 3. The right of rectification
- 4. The right to erasure

- 5. The right to restrict processing
- 6. The right to data portability
- 7. The right to object
- 8. Rights in relation to automated decision making and profiling

#### the right to be informed

This obligates the data controller's need to provide at your request "fair processing information", typically through a privacy notice such as this, in order to provide transparency over how GIGL uses personal data.

#### the right of access

This right allows you to request confirmation that your data is being processed, access to your personal data, and the supplementary information that is provided in this privacy policy.

#### the right of rectification

You have the right to have your personal data corrected if it is inaccurate or incomplete. If GIGL has disclosed your personal data to third parties, we must then inform them of the rectification where possible, and inform you about the third parties to whom your data has been disclosed, if appropriate.

#### the right to erasure

This is known as the "right to be forgotten", and the principle underpinning this right is to enable an individual to request the deletion or removal of personal data where there is no compelling reason for its continuing processing. Some requests however can be refused for specific reasons as set out on the ICO.org.uk website. We may also have to retain some basic details to ensure we do not start processing your data again, should it be provided to us through a purchase of data.

#### the right to restrict processing

You have the right to "block" or suppress processing of personal data, i.e. request not to be contacted for marketing or information dispersal. In this case your data would be retained to ensure that the restriction is respected in future.

#### the right to data portability

This right allows individuals to obtain and reuse their personal data for their own purposes across different services, i.e. to move, copy or transfer personal data from one IT environment to another in a safe and secure way (an example would be a bank allowing you to access your personal online banking data and then upload it to a price comparison website to compare and identify your best value banking options).

This right does not apply to data which is processed under the legal basis of Legitimate Use.

#### the right to object

Individuals have a right to object (on "grounds relating to his or her particular situation") to:

- processing of their data based on legitimate interests or the performance of a task in the public interest/exercise of official authority (including profiling);
- direct marketing (including profiling); and
- processing for purposes of scientific/historical research and statistics.

If you wish to discuss/request any of the above rights, please email, Tammy Marie Smalley, who will co-ordinate with the Data Protection Officer. Email via: gigl@lincstrust.co.uk

# How can you access the personal information we hold about you?

If you would like to see the data we hold about you, you can submit a subject access request by emailing. As long as your request is not manifestly unfounded or excessive, we will provide you with this information free of charge, within 30 days of receipt of your written request. However, we reserve the right to make a charge if providing this data requires we retrieve data from backups or storage facilities. We may request proof of identity before we release the data to you.

## Cookies Information

We may collect and store Information whenever you use the GIGL Website by the use of Cookies. Cookies re alphanumeric identifiers that may in some cases be transferred to your computer's hard drive via your browser to enable our computers to recognise your browser when you use the Website. The use of cookies is an industry standard and most major websites use them to provide functionality and personalisation for their customers.

We only use Cookies in order to make your use of the Website easier. Browsers can be adjusted to prevent acceptance of cookies or notify the user on receipt of cookies. If your computer is unable to accept cookies, the Website will operate less efficiently. Cookies in themselves do not personally identify users, although they do identify a user's computer.

Our web-servers may automatically store the following Information about you: your ISP, your IP address, your web browser type and version, the number of colours your screen is displaying, your operating system, the URL you clicked to get to the Website, time/ date, http accept string (e.g. mime data types that the browser accepts), the locale setting of the computer/ browser and all other data made available by your browser and this Information is used to make the Website operate more efficiently.

You do not have to provide any information in order to use the GIGL Website.

#### How to refuse the use of cookies

You may refuse the use of cookies by selecting the appropriate settings in your browser. However, if you do this you may lose some useful functionality such as personalisation and "keep me signed in" and "remember me" features. <u>How to disable cookies in your browser</u>.

## **Google Analytics**

Our website uses Google Analytics, a web analytics service provided by Google, Inc. ("Google"). Google Analytics uses cookies (text files placed on your computer) to help the website operators analyse how users use the site. The information generated by the cookie about your use of the website (including your IP address) will be transmitted to and stored by Google on servers in the United States. Google will use this information for the purpose of evaluating your use of the website, compiling reports on website activity for GIGL and providing other services relating to website activity and internet usage. Google may also transfer this information to third parties where required to do so by law, or where such third parties process the information on Google's behalf. Google will not associate your IP address with any other data held by Google. By using this website, you consent to the processing of data about you by Google in the manner and for the purposes set out above.

## **Data Protection Rights**

The Data Protection Act 1998 gives you certain rights including a right to request a copy of your Information and to have inaccurate Information corrected (a "subject access request"). We may request proof of identity before we will release the information to you which we will supply within 30 days. We have the right to refuse this request if we consider it is manifestly unfounded or excessive. You have the right to submit a complaint to the Information Commissioner's Office (ICO.org.uk) if you feel we have not treated your request fairly.

## Further Information

For more information on data protection legislation and related matters please visit the Information Commissioner's website at <u>www.ico.org.uk</u>.

## Changes

Any changes to the Privacy Policy will be posted on the GIGL website.

## Want to know more?

If you remain concerned about information disclosure or have any questions about this Privacy Statement, this website or your dealings with GIGL you can contact us via e-mail on this site or by writing us at the following address:

## Data Controller

Lincolnshire Wildlife Trust, Banovallum House, Manor House Street, Horncastle, Lincolnshire LN9 5HF.

## Data Protection Officer and GIGL Co-ordinating Officer

Paul Learoyd, CEO and Tammy Marie Smalley, Head of Conservation.

Green Investment Greater Lincolnshire

Address as above.

Email: gigl@lincstrust.co.uk

Tel: 01507 526667 – reception at the above address.