

## Colwall Orchard Trust Privacy Statement

### Introduction

1. Colwall Orchard Trust<sup>1</sup>, known as Colwall Orchard Group (COG), is a registered charity and a limited company set up with the objective to restore, promote and celebrate traditional orchards in the parish of Colwall in order to benefit the natural environment and the local community, and to advocate the importance of traditional orchards and fruit varieties both locally and nationally.
2. This statement has been prepared and agreed by COG Trustees to explain how we comply with the General Data Protection Regulation (GDPR<sup>2</sup>). It is our policy on data protection.
3. COG's Privacy Policy is on our website. All our email communication includes a statement as a footnote to summarise our GDPR obligations with a link to the website.
4. We collect and retain contact data for our members and for those who have expressed an interest in keeping in touch. As a charity, COG supporters (eg members), have a 'legitimate interest' in receiving information from us and this allows us to keep contact information data. Our supporters are invited to opt-in to receiving communications from COG either when they sign up as members, or via an opt-in email request.

### Data held by COG

5. We collect the following data provided on a voluntary basis:

| Data collected                                     | Purpose                                                                                                                                                                                                                                                                                                                                                                                                                              |
|----------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>COG members, supporters, and other contacts</b> |                                                                                                                                                                                                                                                                                                                                                                                                                                      |
| Contact data (see paras 6-9)                       | <ul style="list-style-type: none"><li>• to keep members and other contacts informed about our activities and events;</li><li>• to advise on how individuals can support our work;</li><li>• to remind members when their annual membership is due for renewal;</li><li>• to claim Gift Aid contributions from Her Majesty's Revenue and Customs (HMRC).</li></ul>                                                                    |
| Contact and Payment data (para 14)                 | <ul style="list-style-type: none"><li>• to process online financial transactions and to reimburse payment if necessary.</li></ul>                                                                                                                                                                                                                                                                                                    |
| IP address and Cookies                             | <ul style="list-style-type: none"><li>• We may collect information about your computer, including where available your IP address, operating system and browser type, for system security, customer support and site analytics. This statistical data cannot be used to identify a customer.</li><li>• Cookies are used to track visitors through our site and to save booking and purchasing information as you move from</li></ul> |

<sup>1</sup> Colwall Orchard Trust Ltd, known as Colwall Orchard Group is a company limited by guaranteee (registration no. 07495461) and a charity (registration no. 1142573)

<sup>2</sup> The **General Data Protection Regulation (GDPR)** (EU) [2016/679](#) is a regulation in EU law on data protection and privacy for all individuals within the European Union. It was adopted on 27 April 2016 and became enforceable from 25 May 2018.

|                                                                                                    |                                                                                                                                                                                                         |
|----------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                                                                                                    | page to page of the booking and purchasing process.                                                                                                                                                     |
| <b>COG Trustees and Company Directors</b>                                                          |                                                                                                                                                                                                         |
| Contact details and declaration of interests                                                       | <ul style="list-style-type: none"><li>• to register appointments with Companies House and the Charity Commission.</li></ul>                                                                             |
| <b>Active volunteers</b>                                                                           |                                                                                                                                                                                                         |
| Questionnaire data on medical conditions, satisfaction with volunteer sessions and training needs. | <ul style="list-style-type: none"><li>• to meet COG health and safety policy requirements (see para 10);</li><li>• to tailor volunteer sessions and to provide adequate training and support.</li></ul> |

## **Membership**

6. Information is collected from members on a membership application form and the paper forms are stored securely. Contact information data is recorded electronically on a password protected members database.
7. Members are invited to supply an email address, phone number and postal address annually on a membership form which explains the reason for gathering and holding the information. This means that members are opting-in to receiving information from us. While communication to members is mainly by email, there are occasions when contact by phone or text is helpful, for example when changes are made to arrangements for meetings, activities and events. A postal address is required if a member wishes us to claim Gift Aid on their COG membership donation or any other donation, but is also useful for occasional correspondence, for example to circulate flyers and leaflets. Members are prompted to let us know if their contact details change.
8. Membership data will be destroyed 12 months after the annual membership renewal date if a member does not renew their membership.

## **Contacts**

9. Other contacts (non-members) are notified of our intention to add them to our mailing list by an email stating that we would like to stay in touch. This is an opt-in agreement and contacts can opt-out of receiving communication at any time by using the contact details listed below.

## **Volunteers**

10. Additional information is requested from our volunteers to meet our health and safety policy. This is collected on a form (Volunteer Emergency Contact details) and it ensures that we are aware of medical conditions that might occur during volunteer tasks or which would be helpful to be aware of if an accident or incident occurred. The information requested includes an emergency contact. The information is taken with medical emergency equipment on all volunteer tasks. In the event of an emergency we would share this information with medical practitioners.
11. From time to time we will also seek information from volunteers on their experience of volunteering with COG and to ask if they have training requirements. The information is

collected using Third party questionnaire software (such as Survey Monkey) which will also analyse the data. This information is provided on a voluntary basis.

### **Sharing your personal data**

12. We do not pass or sell customer or member details to Third parties. The exceptions to this are:

- Gift Aid information - supplied to HMRC in order that we can claim Gift Aid as instructed by the individual donating to COG;
- PayPal transactions (see paragraph 14).

13. If individual contact details are requested by another individual or organisation other than COG (for example a grant giving body) these would only be forwarded with the explicit permission of the individual concerned. This means that the individual would need to actively state that they authorised us to share their contact details before any information was shared.

### **Financial transactions via PayPal**

14. Through our web site we have the ability to undertake financial transactions using PayPal. When this facility is used we do not keep any contact information associated with the transaction for longer than the transaction takes to complete. Processing the data is necessary for the performance of a contract (i.e. the processing of ticket bookings or membership purchase via PayPal) and legitimate interest (i.e. storage or IP Addresses for risk management or Cookies to allow full access and smooth progression through our website). We also use your personal data to send you email communication regarding your purchase to:

- send booking reminders or to advise you of an event cancellation;
- to assist you with any query that you may have with your booking or payment;
- to manage ticketing for an event and to facilitate ticket pick-up;
- to perform quality assurance, sales analysis or other business analysis
- to send membership confirmation.

### **Other websites**

15. Our website may contain links to other websites or social media pages. This Privacy Policy only applies to the data held and processed by COG so when you link to other websites you should read their own privacy policies.

### **Your Rights and your Personal Data**

16. Under GDPR you have the following rights:

- Right to be informed of why your data is being processed (included within this Data Privacy Policy)
- Right of access to the Personal Data held
- Right of rectification if incorrect data is held
- Right to the erasure of data held by COG (may be subject to any financial contract and retention periods)
- Right to object to processing

17. To instigate any of your rights under GDPR, you will need to contact the COG Secretary using the contact details listed below.

### Contact Details

18. To exercise any relevant rights, queries or complaints regarding COG and the handling of your Personal Data, please contact:

The Secretary  
COG  
1 The Way  
Mathon Road  
Colwall  
WR13 6ER  
Email: [members@colwallorchardgroup.org](mailto:members@colwallorchardgroup.org)

### How to make a complaint

If you are unhappy with the way in which your personal data has been processed by COG, you may in the first instance contact The Secretary using the contact details above.

If you remain dissatisfied, then you have the right to apply directly to the Information Commissioner for a decision. The Information Commissioner can be contacted by phone on 0303 123 1113 or via their online notification system at [www.ico.org.uk/make-a-complaint/](http://www.ico.org.uk/make-a-complaint/)

**Agreed by Colwall Orchard Trust, Directors and Trustees  
May 2020**