



GENERAL DATA PROTECTION PRIVACY POLICY

WHO WE ARE

Animal Concern Cumbria is a small local charity registered in England - charity no 1161354, our key aims are to help find new homes for neglected or unwanted animals and cares for animals in need. The Charity is self-funded.

Animal Concern Cumbria is herein referred to as ACC.

DATA PROTECTION

ACC appreciates your involvement and support with the charity works and aims, and we respect your right to choose how we use your personal data.

This Privacy Policy sets out how and why ACC will collect and use your personal data and our legal basis for its use; to ensure you remain informed and in control of your information.

TYPES OF PERSONAL DATA WE COLLECT

ACC may collect some or all the following data about you depending on the reason for your involvement with us:

- Your contact details, such as name, postal address, email address and telephone
- Your date of birth
- Your financial information such as bank account details
- Your Gift Aid declaration
- Some or all the details about your personal circumstances, home and health if you are surrendering or adopting an animal with us or fostering one of our animals
- Details of any health matters we need to consider if you are volunteering for us, or if you are adopting or fostering one of our animals
- A record of our communications with you
- Your communication preferences
- Your donation history

- Your interests, and reasons for your support
- Information about your dog/cat or other animal, in respect of their behaviour, medical conditions and treatment.
- Your next of kin details, if you are an employee, a trustee or a charity volunteer
- Photography and videography, such as images at events, case studies and other marketing materials
- Images of you on CCTV when at our site – The Mary Irwin Centre, Egremont, CA22 2UA

Sensitive information

Under data protection law, certain categories of personal information are recognised as sensitive, including health information, race and religious beliefs. ACC will sometimes collect sensitive personal data in connection with our rehoming services (for example that the right animal is rehomed with you), or where you volunteer or apply for a job with us. In these cases, we will obtain your consent to process this data, or alternatively ensure that we have a valid legal basis for doing so.

WHERE DOES THIS INFORMATION COME FROM?

Most personal data we process is given to us directly by the individual such as our members, volunteers, adopters, fosterers, donators and supporters during their interactions with us.

We may also receive your personal information when you donate to ACC through third-party services such as Just Giving, Virgin Money Giving, PayPal etc.

In some situations, we may update our supporters and volunteers' personal information using information from public registers or other agencies. For example, we might do this to check we have a valid and deliverable postal address for you, or to check if you are on Telephone Preference Service (TPS) or Fundraising Preference Service (FPS).

HOW WE USE YOUR DATA

In simple terms, your personal data may be used to help us effectively deliver our charitable services or to help us raise funds for those charitable services.

We have summarised below the different reasons why we do this (these are often referred to as 'purposes'). How we use your data for these purposes will depend on the nature of our relationship with you.

| CATEGORY | EXAMPLES OF PURPOSES FOR WHICH WE COLLECT, STORE AND PROCESS YOUR DATA |
|---------------------------------|--|
| Rehoming animals | <ul style="list-style-type: none"> • If you have registered to rehome an animal from ACC, we will use the information you provide us to assist in finding you the right animal • To provide you with aftercare services once you have rehomed an animal • To communicate with you regarding our wider work and how you might support ACC in other ways |
| Taking in animals | <ul style="list-style-type: none"> • If you have contacted us to gift us your animal for rehoming, we will use the information you provide us to establish how we can best look after that animal while it is in our care • To assess how we might safely and permanently rehome your animal • To enable us to meet the relevant legal requirements/standards where they apply to animals brought into our care |
| Reporting lost or found animals | <ul style="list-style-type: none"> • To register details of a lost or found animal for the purposes of reuniting owners with their pet |
| Volunteering | <ul style="list-style-type: none"> • To enable us to recruit trustees, volunteers and foster carers • To support and train volunteers and ensure their safety • To enable us to communicate with volunteers regarding their volunteering work, the wider work of ACC and how they might support in other ways |
| Marketing and Fundraising | <ul style="list-style-type: none"> • To send you marketing including behind the scenes news, updates about our animals, general information about rehoming, volunteering and various ways you can support ACC, including fundraising, events and campaigning • To efficiently raise the fundraising income to allow us to be here for animals in need • To manage, facilitate and record financial transactions associated with fundraising • To manage events and fundraising activities • To ensure that as many supporters as possible maximise the value of their donation through Gift Aid |
| Legacies | <ul style="list-style-type: none"> • If you have got in touch with us about leaving us a legacy, we will manage and administrate your legacy pledge |
| Events | <ul style="list-style-type: none"> • To process registration fees, administer events • To collect and store images and videography with the purposes to promote future fundraising events |

| CATEGORY | EXAMPLES OF PURPOSES FOR WHICH WE COLLECT, STORE AND PROCESS YOUR DATA |
|--------------------------------------|--|
| Media & PR | <ul style="list-style-type: none"> • Contacting you about press enquiries and case studies to help promote our work |
| Analysis, targeting and segmentation | <ul style="list-style-type: none"> • To better understand our supporters and allow us to communicate relevant messages and marketing about the charity that you will be interested in, and to find more people like you |
| Donations | <ul style="list-style-type: none"> • To process your donation and send an acknowledgement of receipt and a thank you letter • We may also use your personal information for the recovery of Gift Aid (where you have completed a Gift Aid declaration) |
| Retail trading and online purchases | <ul style="list-style-type: none"> • Storage of staff/trustee names and address for expense claims relating to purchases |
| Enquiries/complaints | <ul style="list-style-type: none"> • To enable us to record, consider and reply to enquiries/complaints |
| Research | <ul style="list-style-type: none"> • To send you surveys • To carry out research in relation to our supporters and services |
| Employment | <ul style="list-style-type: none"> • To enable the charity to select and recruit staff |
| Photograph / videography | <ul style="list-style-type: none"> • To archive and store images and videos for historical interest and event promotion |
| | <ul style="list-style-type: none"> • CCTV Image recording at our Mary Irwin site, Egremont, CA22 2UA for the lawful purpose of prevention and detection of crime. |

When you rehome one of our animals, we ask you to provide us with information about your home, personal circumstances, and in some cases health or mobility requirements so that we are better able to match you with an animal that is going to best meet its, and you/your family's needs and life circumstances.

SURRENDERING

We will also ask for certain information about your animal and you (including the reason or circumstances that led to you needing to surrender your pet, and any information about your pet's behaviour towards yourself and others in the household/family/visitors that will help us with their care or onward rehoming.

We also ask for this information so that we can comply with the relevant legal requirements when rehoming an animal such as establishing the legal ownership of animals or updating microchip details.

VOLUNTEERING

Volunteers provide invaluable support across all aspects of ACC and to help us understand your volunteering preferences and abilities, and our ability to support you to volunteer; we ask for personal and sensitive information. Where you have provided us with your information to volunteer, we use it to assess your needs against our facilities to match roles/tasks and to support/train volunteers.

We will also use the information to communicate with you generally about the work we do to ensure that you are kept well informed about ACC, your own volunteering and how you can get more involved.

MARKETING AND FUNDRAISING

ACC's marketing activity helps to find more animals permanent and loving homes and helps us to raise the income we need which enables us to do this. Our marketing activity also enables us to provide help to animals beyond our rehoming, such as behavioural therapy, health support and through our community engagement work, educational and campaigning activity.

ACC will seek your consent to send you marketing via email, phone or text message (SMS), facebook, messenger or other social media. If you choose to hear from us in any of these ways, you'll receive news, updates about our animals, general information about rehoming, volunteering and various ways you can support ACC, including fundraising, events and campaigning.

When you register to attend or take part in one of our fundraising or events, we will use your information to process the registration fees (if any), administer your participation in the event and provide you with information about the event. We may also need to share your details with the organisers/insurers of the event, in doing so we rely on the integrity of the third party to lawfully administer their own Data Protection Policy.

We will never rent, swap or sell your details for marketing purposes.

You're free to change your contact preferences at any time, just let us know by [contacting us](#).

FINANCIAL TRANSACTIONS

If you donate to us or buy something from us and you use debit or credit card details, we will process these in accordance with our financial policy; we don't store the details on our website or databases.

If you have kindly added Gift Aid to your donation to ACC, we must record the fact that you are a UK taxpayer, and we must maintain a record of the amount of Gift Aid we have claimed.

When you purchase an item from ACC on our online shop or give an order to our staff/trustees we will collect certain information from you including your name, address, phone number, email address and payment details, so that we can process and send you your item or contact you if we have any queries regarding your purchase.

ANALYSING YOUR INFORMATION

It's important for us to know why you choose to support ACC, as this helps us to give you the information that is most relevant for you. We'll analyse your data to better understand your preferences, to improve our services, and to tailor our marketing communications to you. The information we'll use to do this might include things like your interests, preferences, and level of potential donations so that we can see who may be interested in supporting us or who may be able and willing to give more.

In some instances, we may add publicly available information to our analysis. This might include information that is contained in the Companies House or Charity Commission Registers, press and web articles and Linked In.

HOW THE LAW APPLIES TO ANIMAL CONCERN CUMBRIA'S USE OF PERSONAL INFORMATION

We are required under law to make sure that we have a valid ground for processing your data. The law sets out six different grounds for when personal data can be processed (plus additional ones where sensitive data is used) The legal grounds that are most relevant to ACCs use of your personal information are:

- Consent
- Legitimate Interest
- Contract
- Legal Obligation

Overview

ACC will only process your personal information if any of the following apply:

- We have asked you for your express **consent** and have a record of this (for example, we will ask for your consent to send you news or marketing communications by email)
- We have a **legitimate interest** to do so. Our use will be fair and balanced and never unduly have an impact on your rights (for example, it is in our legitimate interests to contact you about animals you have enquired about, your enquiries on how to support ACC, volunteering etc.
- We have a **contract** with you which we can only fulfil by using your personal information (for example, if you are a volunteer, fosterer or adopter)

- We have a **legal obligation** to use or disclose information about you (for example, we are required by law to keep a record of Gift Aid declarations for six years or the images on our CCTV are used to identify crime).

Consent

In some cases, we will rely on consent; for example, to send you or make marketing and fundraising emails, phone calls and text messages. In addition, if you register as an ACC volunteer it can be very helpful if you share information on any medical conditions that may affect your ability to perform your voluntary work. You can withdraw consent for these channels and activities by [contacting us](#).

Legitimate Interests

This legal ground for processing means that we can process your personal information if we have a genuine and legitimate reason for doing so, and that reason is not overridden by your rights and interests as an individual.

Examples of the legitimate interests processing activities we undertake are:

| BUSINESS OBJECTIVES | PROCESSING ACTIVITIES |
|---|---|
| Employment & Trustee Recruitment | <ul style="list-style-type: none">• To assess and recruit appropriate individuals as employees/trustees to work in the charity |
| | <ul style="list-style-type: none">• To manage the work performance of employees and trustees |
| | <ul style="list-style-type: none">• To process formal employment items such as PAYE, Pension etc |
| To allow us to provide the best possible care and future for every animal we support. | <ul style="list-style-type: none">• To assess suitability for rehoming and to follow up with you about your rehoming enquiry• To capture the information, we need when we take in an animal, to allow us to care for that animal and ultimately rehome it• To provide you with aftercare services once you have rehomed an animal from us• To conduct home visits to assess suitability as part of the rehoming process• To register new owners' details with microchip databases |
| To raise the fundraising income to allow us to be here for animals in need | <ul style="list-style-type: none">• To process your donations and Gift Aid where you have asked us to do so• To send you marketing communications |
| For administration purposes | <ul style="list-style-type: none">• To provide you with information necessary to an event you have signed up for• To provide you with information about any fundraising activities you have agreed to take part in• To follow up with you about your enquiry |
| | <ul style="list-style-type: none">• To meet legal requirements for record keeping i.e. financial records for 7 years; employment records/references for 30 years |
| To conduct research | <ul style="list-style-type: none">• To conduct supporter satisfaction research• To invite you to take part in surveys or research to help improve our services• To conduct research to help identify supporters |

| BUSINESS OBJECTIVES | PROCESSING ACTIVITIES |
|----------------------------------|--|
| To analyse data | <ul style="list-style-type: none"> • To better understand our supporters and tailor our communications to them |
| | <ul style="list-style-type: none"> • Viewing the CCTV images for security purposes |
| To recruit and manage volunteers | <ul style="list-style-type: none"> • To assess volunteer (including foster carer) applications and recruit volunteers • To communicate with volunteers about information that is essential to their role, and about the wider activities of ACC. • To process volunteers and foster carers data to effectively administer their close relationships with ACC and provide them with appropriate care and support |

We have considered and balanced our legitimate interests against individuals' privacy rights in these scenarios and we do not believe that any adversely affect our supporters' rights or interests. If you would like to find out more or ask us to stop processing your data in these ways, you can do this at any time by contacting us.

Contractual relationships

In some cases, we will be under a contractual obligation to provide you with goods and services, which means that we have to process your data in order to fulfil those obligations. Some examples of this include if you are an ACC adopter or fosterer, or if you purchase any goods from us.

A legal obligation

Sometimes we may have a legal obligation to process information about you – for example we are obliged to keep financial records including Gift Aid for six years. We're required to keep a record of your communication preferences, in accordance with the General Data Protection Regulation.

FILMING AND PHOTOGRAPHY AT EVENTS

Please note that ACC (or our authorised service providers) or our commercial partners may film or photograph participants, volunteers and spectators attending or taking part in events and use such footage or photographs.

We do this in order to publicise the event for commercial and/or fundraising purposes including, but not limited to: television broadcasts, advertising, publications, marketing material, merchandising, social media, personalised direct mail and other media that may be made available to the public. Secondly, to enable our commercial partners to publicise their involvement and/or association with the event.

No personal details (including names) of any under 18-year-old participants will be used in any publicity materials without the written consent of their parent or legal guardian, but we may use images where children are incidentally included (for example, images of mass participation in activities such as fashion parades/Christmas events).

DATA RETENTION

We'll retain personal information for different periods of time depending on your relationship with ACC.

For example, if you donate to us, we'll keep your financial information for up to seven years after your last interaction with us. If you rehome an animal, we'll keep details relating to your rehoming circumstances for 20 years (the upper limit lifetime of the animal).

We will keep some data indefinitely (for example, your name and giving history). It's important for us to retain this information as a majority of ACCs legacy income comes from people we weren't aware would leave us a gift in their will. Sometimes this legacy is left decades after the supporter's last interaction with ACC and family wish to know/understand the relationship with ACC that their relation held. It is also useful to ACC to evidence that the individual was a supporter in the past in case that legacy is contested.

In these cases, we'll only retain data that is necessary for these purposes, and we will delete or anonymise other parts of the record.

If you decide you no longer wish to hear from us, we'll need to keep a note of that on our suppression list indefinitely.

If you'd like more information on our retention policy, please [contact us](#).

DATA STORAGE

ACC operations are based in the UK and we store our data within the European Economic Area (EEA).

DATA SHARING

ACC will not exchange or sell your personal information to another organisation; we only use your information for ACC purposes.

However, there are some situations where we may have to share your personal information with other organisations. An example could be sharing your details to reunite you with a lost animal via a vet, or to update microchipping databases. In some cases, we may have to share data about you when requested to do so by statutory agencies, such as the police.

We may also share your data with our contracted suppliers, and external service providers, such as our:

- associated Veterinary Practices;
- animal food/equipment suppliers where we are ordering deliveries directly to you
- Animal service providers such as groomers, dog walkers where we are assisting you with these
- email service providers;
- fundraising agencies;
- and marketing agencies.

In these situations, the relationship between ACC and the supplier will be governed by a contract and strict security requirements will be in place to protect your personal information.

YOUR DATA PROTECTION RIGHTS

When ACC is using your personal information based on your consent, you have the right to withdraw that consent at any time. You also have the right to ask ACC to stop using your personal information for direct marketing purposes. Simply [contact us](#) and we will amend your contact preferences.

Presuming that these rights are not overridden by our legal obligations, or where our legitimate interests are not overridden by your rights and interests as an individual, you have the following data protection rights:

Right to be Informed

You have the right to be told how your personal information will be used. This policy document, and shorter summary statements used on our communications, are intended to be a clear and transparent description of how your data may be used.

Right of Access

You can [contact us](#) asking what information we hold on you and to request a copy of that information. We will have 30 days to comply once we are satisfied you have rights to see the requested records and we have successfully confirmed your identity.

Right of Erasure

You have the right to be forgotten (i.e. to have your personally identifiable data deleted). We will be required to keep an appropriate record (such as a suppression list) so that we can make sure you don't receive future communications. In some instances, a legal basis will override the right to erasure. An example of this would be the legal requirement to record financial transactions for at least six years.

Right of Rectification

If you believe our records are inaccurate you have the right to ask for those records concerning you to be updated.

Right to Restrict Processing

In certain situations, you have the right to ask for processing of your personal data to be restricted because there is some disagreement about its accuracy or legitimate usage.

Right to Data Portability

Where we are processing your personal data under your consent the law allows you to request data portability from one service provider to another.

Right to Object

You have an absolute right to stop the processing of your personal data for direct marketing purposes.

Right to object to automated decisions

In a situation where a data controller is using your personal data in a computerised model or algorithm to make decisions that have a legal effect on you, you have the right to object. ACC does not undertake complex computerised decision-making that produces legal effects.

If you want to exercise any of these rights, please contact.....

The Data Controller
Animal Concern Cumbria
Mary Irwin Centre
Marlborough Lonning
Egremont
Cumbria
CA28 9UG

NOTIFICATION OF CHANGES TO THIS PRIVACY POLICY

This Privacy Policy may change from time to time. For example, we will continue to update it to reflect new legal requirements. Please visit our website to keep up to date with the changes to our Privacy Policy or contact us to forward you a copy.

WHAT TO DO IF YOU HAVE A QUERY OR ARE NOT HAPPY

In the first instance, please talk to us directly so we can help resolve any problem or query. You can reach us on Office numbers: 01946 823373 (ansaphone) or 07712 330829

email to: contact@animalconcerncumbria.org

write to us at:

The Data Controller
Animal Concern Cumbria
Mary Irwin Centre
Egremont
Cumbria
CA22 2UA

You can also register with the fundraising preference service (FPS). This service is run by the Fundraising Regulator and allows you to stop email, telephone, addressed post, and/or text messages from a selected charity or charities by using the online service at public.fundraisingpreference.org.uk or by calling 0300 303 3517.

You also have the right to contact the Information Commissioners Office (ICO) if you have any concerns about Data Protection using their help line **0303 123 1113** or at www.ico.org.uk

Contact us: If you have any questions about this Policy, or about how Animal Concern Cumbria manages your data, please contact us as above.