



Privacy Policy

March 2021

1. INTRODUCTION

The General Data Protection Regulation and Data Protection Act 2018 require organisations, businesses and the government to keep your personal data secure and to only use it in accordance with the data protection principles.

The Basingstoke Canal Society and its trading subsidiaries are committed to protecting your privacy and security. We ensure that any personal data used by us or given to us is treated in accordance with data protection legislation. This Privacy Policy explains how we use your personal data and the ways in which we protect your privacy.

When we collect information about you, we may provide you with a detailed privacy notice which tells you more about why we are collecting it and what we are using it for. We will only use your information in accordance with that privacy notice.

2. DEFINITIONS

"We" and "Us" - *The Basingstoke Canal Society* (formal title *The Surrey and Hampshire Canal Society Ltd.*) and our two trading subsidiaries *John Pinkerton Canal Cruises Ltd.* and *Surrey and Hampshire Canal Cruises Ltd.*, hereafter all collectively referred to as *"The Society"*.

"Personal data" - any data which identifies you, or which can be identified as relating to you personally.

For the purposes of data protection law, *The Society* will be the *data controller* and *data processor*.

3. WHAT INFORMATION WE COLLECT

3.1 Personal data you provide

We collect personally identifiable data you provide to us. This includes information you give when:

- communicating with us or browsing our websites
- joining as a Society member, registering online as a Canal Friend or signing up as a volunteer
- making a donation or bequest or making a GiftAid declaration
- you place an order for goods or services (for example, booking a boat trip or purchasing from our Shop)
- visiting our trip boats (for "test and trace" purposes while Covid restrictions are in place)
- *The Society* places an order with you for goods or services
- you require a refund, or reimbursement for expenditure made on behalf of *The Society*

The data can include:

- Personal details, including your name, email address, postal address, phone numbers, date and place of birth (where required) and next of kin (where required). Personal data can include images.

- Financial information under particular circumstances, as follows: When *The Society* itself needs to make payments to other organisations for goods and services, or to reimburse expenditure made on behalf of *The Society*, or provide refunds. In these cases, bank account information will be stored by our banking providers, currently CAF Bank, NatWest, Paypal and Stripe.

Note: Although financial details are collected temporarily for the purposes of receiving membership subscriptions, donations, bequests and payments for goods and services that we provide, these details are **not retained** by *The Society*.

- Details of your interests and preferences in how you would like to support us
- Skills and training data, in relation to your capability to use potentially hazardous tools and plant, or to undertake potentially hazardous operations, eg chain saw operation, tree felling, or crewing trip boats carrying fare-paying passengers
- Automatically collected tracking cookies that enable certain Society pages to function or indicate our web sites usage trends.

3.2 Special Category (Sensitive) Data

We do not collect, store or process special category data (such as information relating to health).

4. HOW WE USE INFORMATION AND YOUR CONSENT

We only ever use your *personal data* with your consent, or where it is necessary:

- To enter into, or perform, a contract with you;
- for our own lawful, legitimate interests, provided your rights don't override these.

In any event, we'll only use your information for the purposes it was collected (or else for closely related purposes):

4.1 Administration

We use *personal data* for administrative purposes, that is, in order to undertake the business of *The Society*. This includes:

- receiving subscriptions and donations (including standing orders, direct debits or gift-aid instructions);
- maintaining databases of our members, canal friends and volunteers;
- meeting our obligations and providing benefits to members, friends and volunteers, including distribution of the *Basingstoke Canal News* magazine and online *Basingstoke Canal Bulletin* (unless you specifically ask us not to)
- telling you about and fulfilling orders for goods and services, and processing related financial transactions
- making refunds or expenses reimbursements
- our placing orders for goods and services
- helping us respect your choices and preferences (for example, if you ask not to receive online promotional material, a record will be kept of this).

We also use your *personal data* in the following ways:

- to analyse patterns and trends regarding the usage of our services and other data relevant to the running of the Society

- to obtain feedback or for service and financial planning to help us create policy and inform decision making
- to verify your identity if you ask us for services
- to investigate any concerns or complaints you have may have about the goods or services you receive
- to establish, exercise or defend legal claims
- where otherwise allowed under the General Data Protection Regulation and Data Protection Act 2018. For further information refer to the [Information Commissioner's website](#).

4.2 Promotional Materials and Consent

The free online *Basingstoke Canal Bulletin* provides information about activities on the Canal and will from time to time be used to distribute material promoting the Society including:

- news about *The Society*, its activities, achievements and commercial operations, and canal-related events
- news about our goods and services
- requests for volunteer help with various canal-related activities
- requests for donations or help with fundraising.

By subscribing to the Bulletin, recipients consent to receive this material, however can “opt out” at any time.

Note that the hard-copy *Basingstoke Canal News* pack distributed in the post may occasionally contain promotional inserts.

We will also make extensive use of social media to promote *The Society*. Those wishing to receive these promotional updates need to “follow” *The Society's* social media channels, and to “unfollow” if you wish to opt out of this.

5. DISCLOSING AND SHARING DATA

We will never sell your *personal data*, nor share it with another company or charity for marketing purposes.

We will not disclose or share your *personal data* without your explicit consent except in a small number of situations where disclosure is allowed by law, or where we have good reason to believe that failing to do so would put you or someone else at risk.

Your *personal data* will be shared as appropriate or necessary amongst the trustees/committee members of *The Society*, and designated volunteers who undertake specific tasks on our behalf, in order that we can fulfil our legitimate interests, including meeting our obligations to *The Society* membership and supporters.

5.1 Third Parties

Personal data is shared with the following third-party suppliers which enable *The Society* to lawfully undertake its business:

- The *Basingstoke Canal Bulletin* is distributed via email by a third-party marketing package (*Mailchimp*). It is also used to distribute emails within *The Society*
- *Fasthosts* hosts our web sites service
- *Wordpress* provides our web sites software framework. Within that framework:
 - *Ultimate Membership Pro* processes membership subscriptions

- o *Woocommerce* handles our online shop purchases, and
- o *Events Manager* takes on-line bookings for cruises on our two trip boats
- Secure *Google Workspace* is used to provide cloud storage, shared data, email and collaboration facilities for trustees/committee members and designated volunteers.
- The *Dropbox* service is also used for cloud storage of some shared data, however will be phased out over time in favour of *Google Workspace*.

Each of these suppliers has their own privacy policies.

We will also share *personal data at their request* with the following regulatory and other organisations:

- The Basingstoke Canal Authority, in connection to navigation and volunteering
- The Maritime and Coastguard Agency, in connection with trip boat skipper training and licensing
- Our insurers (administered by the Inland Waterways Association), in connection with providing cover for volunteers who use potentially hazardous equipment (for example, chain saws).

We will only ever share your data when absolutely necessary and if the privacy and security of your data are guaranteed.

5.2 Email communications

Emails that we send to you or you send to us may be kept as a record of contact. We may also store your email address for future use. If we need to email sensitive or confidential information to you, we may check that we are using the correct email address and may use additional security measures. If you need to send us sensitive information, we recommend using our secure online forms where provided or the postal service.

5.3 External links

Our web sites contain hyperlinks to other web sites. We are not responsible for the content or functionality of any of those external web sites. If an external web site requests personal information from you (for example, in connection with an order for goods or services), the information you provide will not be covered by this Policy. We suggest you read the privacy policy of any web site before providing any personal information.

6. HOW WE PROTECT DATA

To protect your personal information, we will take whatever precautions we can and follow industry best practices to make sure it is not inappropriately lost, misused, accessed, disclosed, altered or destroyed.

The Society is working towards storing all artifacts of Society business, which may include *personal data* collected and used by *The Society*, on a shared secure central cloud repository provided by *Google Workspace*. This service will be accessible only to Society trustees/committee and designated volunteers.

Personal data collected and used by *The Society* that remains on computers kept in the homes or offices of trustees/committee members or designated volunteers will be securely passworded. These computers may be backed up securely to a local device or to the cloud. Any

memory sticks or paper-based records containing personal data, including historical archive materials, will be kept in locked cabinets or drawers.

7 STORAGE

7.1 Where we store information

The Society's operations are based in the UK and generally we and our service providers store our data within the UK. However, the cloud providers and *Mailchimp* operate in the US.

7.2 How long we store information

We will only use and store information for so long as it is required for the purposes it was collected for. How long information will be stored for depends on the information in question and what it is being used for. We may also be required to store data for financial audit purposes or to satisfy insurance requirements.

That said, in general terms, we will retain *personal data* for up to 3 years following its last use, after which it will be deleted – an example of this is the *personal data* associated with a lapsed membership. However, if you request that we erase all your *personal data*, then that will be actioned as soon as possible.

Note that it is an HMRC requirement that GiftAid information is held for at least 6 years. Also, Covid test and trace records (where required) must be retained for 21 days.

If you ask us not to send you promotional information, we will retain your email address to ensure that we don't send material to that email address again, with a record of your preference not to be emailed.

At the start of each financial year, we will review what *personal data* we hold and delete what is no longer required.

Note that our historical archives will be retained in perpetuity.

8 CONTROL OF YOUR PERSONAL DATA

8.1 Your rights

You may exercise the following legal rights regarding your *personal data* which *The Society* collects and uses:

- request to stop using your information for the purposes of direct marketing
- the right to object to decisions being made about you in some circumstances where decisions have been made about you based on profiling. You will be told at the point of collection if your *personal data* will be used for this purpose and how it will be used.
- request to rectify inaccurate information we hold about you
- request to restrict our use of your *personal data*
- request to erase all your *personal data*
- request to provide your *personal data* to an alternative data controller

Please keep in mind that there are exceptions to the rights above and, though we will always try to respond to your satisfaction, there may be situations where we are unable to do so.

If you do not want us to collect or share your *personal data*, or you set conditions on how we can use it, then we may not be able to provide you with the goods or services you want or may only be able to provide them in a limited way.

When we use your personal information on the basis of your consent you will also have the right to withdraw your consent to our use of your *personal data* at any time. In some circumstances, this may mean that you will no longer be able to receive the service for which the *personal data* was collected.

For further information on your rights or if you wish to exercise them, please make contact using the details below.

8.2 Further Information

The Information Commissioner's Office, which regulates and enforces data protection law in the UK, provides helpful advice regarding [raising concerns](#) about this Privacy Policy. Requests for further information should be directed via email to the contact address below.

9. COOKIES

When we provide services, we want to make them easy, useful and reliable. Where services are delivered on the internet, this sometimes involves placing small amounts of information on your computer or mobile phone. These include small files known as cookies. They cannot be used to identify you personally.

The Society occasionally makes use of the Google Analytics web service, which evaluates your use of *The Society's* websites and compiles website activity and internet usage reports. No *personal data* is collected from your computer, and it does not associate your IP address with any other data held by Google.

All major browsers allow you not to accept cookies - you can delete cookies that are already on your device and prevent them from being placed. However, if you do this, you may have to manually adjust some preferences every time you visit *The Society's* websites, and some features may not work.

By using our websites, you consent to the processing of data about you by Google in the manner and for the purposes set out above.

10. CHANGES TO THIS POLICY

We'll amend this Policy from time to time to ensure it remains up-to-date and accurately reflects how and why we use your *personal data*. The current version of our Privacy Policy will always be posted on our website.

11. QUESTIONS AND CONTACT INFORMATION

If you would like further information on your rights regarding your *personal data* we hold and process, or wish to exercise them, or to raise a complaint, please contact us by email at dataprotection@basingstoke-canal.org.uk or call us on 07305 340547.