# Data Protection Information for Norfolk Wherry Trust

## **Privacy Statement**

The privacy and data security of our members, volunteers and customers is important to us. This statement explains how NWT uses personal data to operate the Trust.

Through our communications, events and activities we aim to engage and sustain our links with all who support the work of the Trust. In order to achieve this NWT processes the personal data of our members, volunteers and customers. This helps to ensure that you are getting the most relevant and interesting communications from us for your interests and purposes. This also helps us, where appropriate, to ask for your support with the things we believe you care about the most.

If you have any questions about how we process your personal data or if you wish to opt out of certain types of processing or communications, please contact us by emailing dataprotection@wherryalbion.com.

# WHAT INFORMATION DO WE HOLD ABOUT YOU?

Depending on your relationship with the Trust, personal data held and processed by us may include:

**Biographical Information** 

- Your name, gender and date of birth
- Your current address, telephone number and email address
- Details about your family (e.g. next of Kin)
- Your participation as crew or volunteer

Interactions and Transactions with NWT

- Your membership status, most recent membership payment amount and method, month next payment due.
- For crew; qualifications, health information and training record
- Communication preferences.
- Records of NWT events you register for and attend
- Personal data provided by you for specific purposes (e.g. dietary preferences where relevant)
- Records of other financial transactions with NWT including event payments, webshop purchases, donations and Gift Aid declarations

# WHERE DOES OUR INFORMATION COME FROM?

A significant proportion of the information we hold is provided by you to us, for example you may give us information by filling in membership or charter request forms, or by corresponding with us by telephone, email, face-to-face or otherwise. We may add to this, with data which arises from your interactions with us, such as crew training records.

# HOW WILL WE USE INFORMATION ABOUT YOU?

The data we collect is used by the Trust to carry out our core activities of preserving in perpetuity one or more examples of a Norfolk Wherry, and promoting educational, archival and leisure activities in relation to wherries and the broads. We use data: to communicate with you, to fundraise and help NWT meet its objectives, and for administrative purposes.

The table below outlines where we gather the information necessary to carry out these activities and our legal basis for processing this information for these activities.

How we use your information		Where this information comes from	Our legal basis for processing this information
To communicate with you	Informing you of other events, opportunities or facilities related to or connected with the Trust, such as Social Gatherings, Day Cruises, Open Days and other public events, souvenir sales.	when you join/update your membership details, or sign	Legitimate interests to process your information and/or consent to contact you
	Updates on Trust news, including our two annual mailings but also ad hoc contact, by postal mail, email and social media.		
	Providing details of a service you have requested (e.g. Charter booking, attendance at Laying Up Supper)		
	Communicating with you with regard to any matters arising in relation to continuation of your membership.		
To help the Trust meet its strategic goals, including fundraising	To group and categorise our supporters to inform our strategic approach and measure the effectiveness of our approach e.g. means of becoming a member; likelihood of renewing membership.	From you (e.g. when you join/update your membership details, or sign up as a volunteer)	Legitimate interests
	To provide statistics to the Trustees on patterns of membership and charter business, including geographic location and frequency of engagement, assisting them in making strategic decisions for the future of the Trust.		

administrative and legal purposes	Internal record keeping including the management of any feedback or concerns and the monitoring of crew compliance with our training requirements.	From you	Legal obligation in order to complete government mandated surveys and/or legitimate interests
	For general administrative purposes, e.g. in order to process a donation you have made or to administer an event you have registered for or attended. In order to send purchases to you.		

# SHARING AND DISCLOSING YOUR PERSONAL INFORMATION

Your data will be used primarily by those within the Trust who are designated roles by the committee of Trustees. Personal Data including names, ages where relevant and contact details will be passed to the crew if you are sailing with us.

We do not pass your personal data to third parties or share it for any commercial purposes except in the following circumstances:

- When you have given us permission to do so
- Where we are required to do so by law (e.g. when reclaiming Gift Aid on donations/subscriptions)
- To hosts for specific events (e.g. dietary requirements)

# HOW LONG WE KEEP YOUR PERSONAL INFORMATION

The Trust will retain your data indefinitely in support of your lifelong relationship with the Trust or until you request us to do otherwise. The data we retain indefinitely includes: name; contact details and preferences; most recent membership subscription – amount, due date and payment date; training records (for crew); financial information relating to Gift Aid (if relevant); other personal data as required for legal or regulatory compliance (in particular, for Trustees).

We review the data held on our database to ensure that it is accurate and relevant to our aims (to communicate with you, to promote the aims of the Trust, and to carry out administrative tasks). Where we find information which is out of date, inaccurate or no longer relevant, we remove this data.

Where you exercise your right to erasure, we may retain a core set of personal data (e.g. name and address and date of withdrawal, and financial data required to support a Gift Aid claim) for statutory purposes.

Albion has a log book that records the key details of each sailing she does. This logbook records key details about the voyage including the names of the crew, the name of the

charter party (e.g. "the Smith family", the "Ludham book club") or the lead charterer. Additionally, this log book record all incidents and accidents that happen on the trip. This information sometimes needs to record the name of the individuals involved. This information might need to be reported for regulatory or insurance purposes. The log book is kept indefinitely and becomes part of the archived history of Albion.

The names of the crew and passengers on board each day are held for licensing purposes for the day of charter and are also held until the end of the year as they are required as part of the auditing of the trust. These records are held for up to seven years as part of the accounts, then destroyed.

We also hold any information related to on line purchases for the current year and, at least, until the end of year auditing has been completed.

Although we accept on line and contactless payments in certain circumstances, we never have access to the underlying card or account information. This is always held in Paypal or Zettle respectively. If payments are made direct to our bank account, the source of the payment is unavoidably captured by the bank.

## **EXERCISING YOUR RIGHTS**

UK data protection laws give you a range of rights in relation to your personal data for example: erasure, rectification and subject access. Information about your rights can be found on the Information Commissioner's <u>website</u>. The Trust's reference number is ZA899168.

Where we use legitimate interests to process your data, we have considered our need to process information against your privacy rights. For further information on this, or to opt out of certain types of processing or communications, ask questions, or complain about how we process your personal data, please contact the Trust's Data Protection Officer (see contact information below).

You also have the right to lodge a complaint with the Information Commissioner's Office.

# **Communication Preferences**

Communications may be sent to you by post, telephone or electronic means (principally by email) depending on the contact details we hold and the preferences expressed by you about the types of communications you wish to receive. To let us know how you would prefer to keep in touch with NWT, to request no further communications from us, or if you have any questions about we process your personal data, please contact us as below.

# Corrections

If you wish to correct any information held by the Trust about you, please contact us as below.

# Making a Request for Personal Information

Members, volunteers and customers may request a copy of the personal data held about them by NWT. If you wish to make such a request, please contact the Trust's Data Protection Officer as below.

#### FURTHER INFORMATION

The controller for your personal data is the Norfolk Wherry Trust. We always handle your personal data securely and minimise its use and collection, and there is no overriding prejudice to you by using your personal information for these purposes.

### **Changes to our Privacy Statement**

We regularly review the Trust's privacy statements. This privacy statement was last updated in February 2022. We will publish on our website any changes we make to this privacy statement and notify you by other communication channels where appropriate.

### HOW TO CONTACT US

You can contact the Trust by email: dataprotection@wherryalbion.com.