



# Policy: Privacy & data protection

*Please note: Our privacy policy is updated periodically, and it is advised that you check back for updates regularly. Any changes will replace all previous versions and will be in force from the date of publication. Last updated: July 2023*

## 1 Policy statement

### Background

This policy reflects the requirements of the Data Protection Act 2018, which controls how personal information is used by organisations, businesses or the government. This is the UK's implementation of the General Data Protection Regulations (GDPR).

This policy applies to SWT Ecology Services (registered limited company fully owned by Surrey Wildlife Trust, registration number 11034197).

SWT Ecology Services is committed to ensuring personal information on our clients is kept safe and ensure our clients are informed and in control of their information.

We do not work with data processors, and all data is held internally. We do not sell data to third parties.

### Definitions

In line with the Information Commissioner's Office (ICO), the UK's independent body set up to uphold information rights ([www.ico.org.uk](http://www.ico.org.uk)), uses three definitions, applicable to this policy.

1. 'Data Subject' which includes our clients that may be private individuals.
2. 'Data Controller' which is SWT Ecology Services. With your permission, we determine why and how your personal data is used (as outlined in this policy).
3. 'Data Processor': this is a person, or organisation, which processes your data on our behalf, with your permission.

## 2 Who is covered by this policy

SWT Ecology Services is an ecological consultancy that provides ecological services for our clients, from private individuals to businesses. This policy applies to people that interact with our business.

## 3 Contact

Should you wish to find out more about the information we hold about you, or about our privacy policy, please contact us at [ecologyservices@surreywt.org.uk](mailto:ecologyservices@surreywt.org.uk); SWT Ecology Services, Surrey Wildlife Trust, School Lane, Pirbright, Woking, GU24 0JN

## 4 Why do we collect your personal data?

We will only ever collect, store and use your personal data when we have an identified purpose and reason to do so. The ICO refers to this as a 'lawful basis'. Further information about why we collect your personal data is outlined below.

- Prepare and submit quotes



- Arrange access information for a survey
- Send an invoice
- Contact you specifically about your project you requested our support for
- We do not provide marketing material and will not contact you unless you have specifically requested a response.

## 5 Type of data collected

### Client information

To specifically respond to a project request, we will collect personal contact information to ensure we can quote for the work, attend site (as necessary), invoice and follow up any unpaid invoices. As part of the work, we will collect survey information and photographs. Our photographs do not show personal information as these will be submitted in our technical reports which will be in the public domain if you submit a planning application. We will submit reports directly to you and if there is information you do not wish is submitted in the public realm, you will need to inform us of this.

### Website

Our website uses 'cookies' to help provide you with the best experience we can. Cookies are small text files that are placed on your computer or mobile phone when you browse websites.

Our cookies help us:

- Make our website work as you'd expect
- Remember your settings during and between visits
- Improve the speed/security of the site
- Allow you to share pages with social networks
- Continuously improve our website for you

We do NOT use cookies to:

- Collect any personally identifiable information (without your express permission) •  
Collect any sensitive information (without your express permission)
- Pass personally identifiable data to third parties
- Pay sales commissions

### Special category/criminal offence data

We may also collect special category data if we have had an accident on your land and need to report this, or if a suspected crime has occurred. This information will be retained for legal reasons, for safeguarding purposes and in the event of an insurance or legal claim. Your privacy rights will be protected.

## 6 Storing of data

### Security

#### General

All the personal data we process is undertaken by our staff in the UK. However, for the purposes of IT hosting and maintenance your information may be situated outside of the European Economic Area (EEA). This will be done in accordance with guidance issued by the Information Commissioner's Office.

Electronic data and databases are stored on secure computer systems and we control who has access to information (using both physical and electronic means). Our staff receive data protection training and we have a set of detailed data protection procedures which personnel are required to follow when handling personal data.

### **Payment**

Where you have paid by credit card we will pass your credit card details securely to our payment provider (Verifone or Stripe).

Surrey Wildlife Trust complies with the payment card industry data security standard (PCI-DSS) published by the PCI Security Standards Council, and will never store card details.

We cannot guarantee the security of your home computer or the internet, and any online communications (e.g. information provided by email or our website) are at the user's own risk.

## **7 Length of time data are stored**

We will only use and store information for as long as it required for the purposes it was collected. We continually review what information we hold and delete what is no longer required.

If you have commissioned work with Ecology Services, we will retain your personal data for 7 years and 1 month in line with financial regulations. If you have discussed a project with Ecology and not commissioned work, we will retain your personal data for a period of 3 years to ensure that all information is retained if there has been a delay with the project.

Where you have provided us with data and not commissioned the work, we will remove your personal details from our database within one years of being contacted.

Data will be reviewed every two years to ensure compliance.

## **8 Your rights**

We respect your right to control your data. Your rights include:

- The right to be informed

This privacy notice outlines how we capture, store and use your data. If you have any questions about any elements of this policy, please contact us.

- The right of access

If you wish to obtain a record of the personal data we hold about you, through a Subject Access Request, we will respond within one month.

- The right to rectification

If we have captured information about you that is inaccurate or incomplete, we will update it.

- The right to erase

You can ask us to remove or anonymise your personal details from our records. However, if any financial transaction has taken place we must retain your information for 7 years and 1 month after the last transaction takes place. We will remove or anonymise your personal details after this point, and confirm that it has been done.

- The right to restrict processing

You can ask us to stop using your personal data.

- The right to data portability

You can ask to obtain your personal data from us for your own purposes.

- The right to object

You can ask to be excluded from marketing activity.

- Rights in relation to automated decision making and profiling

We respect your right not to be subject to a decision that is based on automated processing.

For more information on your individual rights, please see the Information Commissioner's Office.

## **9 Making a complaint**

To make a complaint to SWT Ecology Services about your data and privacy, please contact [ecologyservices@surreywt.org.uk](mailto:ecologyservices@surreywt.org.uk)

For further assistance with complaints regarding your data, please contact the Information Commissioner's Office, whose remit covers the UK.

Information Commissioner's Office

Wycliffe House

Water Lane

Wilmslow

SK9 5AF

Telephone: 0303 123 1113

Email: [casework@ico.org.uk](mailto:casework@ico.org.uk)

## **10 Leaving our website**

We are not responsible for the privacy practices, or the content of any other websites linked to our website. If you have followed a link from this website to another website you may be supplying information to a third party.