

# Crispin Hayes Associates Privacy Policy

This Privacy Policy was last updated on 14 May 2018.

## 1 INTRODUCTION

CRISPIN HAYES ASSOCIATES is committed to protecting your privacy and security. This policy explains how and why we use your personal data, to ensure you remain informed and in control of your information.

From 30<sup>th</sup> April 2018, CRISPIN HAYES ASSOCIATES will ask its contacts to “opt-in” for marketing communications. This is due to a change to the rules which govern how we can communicate with you and a new regulation on personal data (the General Data Protection Regulation) coming into force in May 2018. Therefore we are introducing a new approach that relies on you giving us your consent about how we can contact you. This means you'll have the choice as to whether you want to receive these messages and be able to select how you want to receive them (email, phone, SMS or post).

You can decide not to receive communications or change how we contact you at any time. If you wish to do so please contact us by emailing [marketing@eco-consultancy.co.uk](mailto:marketing@eco-consultancy.co.uk) writing to Crispin Hayes Associates, 23 FRIC, Methil Docks Business Park, Fife, KY8 3RS or telephoning 0845 458 8335 (Lines open 9am – 5pm, Mon – Fri).

We will **never** sell your personal data, and will only ever share it with organisations we work with where necessary and if its privacy and security are guaranteed.

### Questions?

Any questions you have in relation to this policy or how we use your personal data should be sent to [privacy@eco-consultancy.co.uk](mailto:privacy@eco-consultancy.co.uk) or addressed to Privacy & Compliance Officer, Crispin Hayes Associates, 23 FRIC, Methil Docks Business Park, Fife, KY8 3RS.

## 2 ABOUT US

Your personal data (i.e. any information which identifies you, or which can be identified as relating to you personally) will be collected and used by CRISPIN HAYES ASSOCIATES (registered as a data controller with the Information Commissioners Office; number Z3542116).

CRISPIN HAYES ASSOCIATES is an environmental consultancy working on sustainability, environment and community. We regularly collaborate with community organisations in partnership projects.

### **3. WHAT INFORMATION WE COLLECT**

#### **Personal data you provide**

We collect data you provide to us. This includes information you give when contacting us, taking part in a survey or consultation, or communicating with us. For example:

- personal details (name, date of birth, email, address, telephone etc.) when you join as a member of staff or a contractor, OR you submit a survey or consultation response, OR when you contact or communicate with us.
- financial information (payment information such as credit/debit card or bank details). Please see section 8 for more information on payment security); and
- details of your interests and preferences (such as campaigns, the ways you support our projects or types of related interest you enjoy).

#### **Information created by your interactions with CRISPIN HAYES ASSOCIATES**

Your activities and interactions with CRISPIN HAYES ASSOCIATES may result in personal data being created. This could include details of how you've helped us by volunteering or being involved with our projects and activities.

#### **Information we generate**

We conduct research and analysis on the information we hold, which can in turn generate personal data. For example, by analysing your interests and involvement with our work we may be able to build a profile which helps us decide which of our communications are likely to interest you.

#### **Information from third parties**

We sometimes receive personal data about individuals from third parties. For example, if we are partnering with another organisation (e.g. you provide your information to another organisation we're collaborating with on a project). Also, we may use third parties to help us conduct research and analysis on personal data (and this can result in new personal data being created).

We may collect information from social media where you have given us permission to do so, or if you post on one of our social media pages.

Occasionally, we may collect information about certain stakeholders (e.g. influential people) from public sources. This could include public databases (such as Companies House), news or other media. We don't do this to everyone, and it is the exception not the rule.

#### **Sensitive personal data**

We do not normally collect or store sensitive personal data (such as information relating to health, beliefs or political affiliation) about people. However there are some situations where this will occur (e.g. if you

volunteer with us or if you have an accident on one of our projects, or if you provide this information in one of our surveys or consultations even when we haven't asked for it. ). If this does occur, we'll take extra care to ensure your privacy rights are protected.

### **Accidents or incidents**

If an accident or incident occurs on one of our projects, at one of our events or involving one of our staff (and contractors and volunteers) then we'll keep a record of this (which may include personal data and sensitive personal data).

### **Volunteer**

If you are a volunteer (whether for specifically CRISPIN HAYES ASSOCIATES, or if you are helping us for other reasons - for example you work for another organisation which is running an event or project with us) then we may collect extra information about you (e.g. references, criminal records checks, details of emergency contacts, medical conditions etc.). This information will be retained for legal reasons, to protect us (including in the event of an insurance or legal claim) and for safeguarding purposes.

## **3 HOW WE USE INFORMATION**

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

- enter into, or perform, a contract with you;
- comply with a legal duty;
- protect your vital interests;
- do so is in the public interest, and there is a clear basis of 'public task';
- for our own (or a third party's) lawful interests, provided your rights don't override the these.

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

### **Marketing**

We use personal data to communicate with people, to promote CRISPIN HAYES ASSOCIATES and to help the projects that we are involved in. This includes keeping you up to date with our news, updates, campaigns and projects. See **Section 5 (Marketing)**.

### **Administration**

We use personal data for administrative purposes (i.e. to carry on our work). This includes:

- maintaining databases of our clients, contractors, volunteers, and survey respondents;
- fulfilling contracts for services
- helping us respect your choices and preferences (e.g. if you ask not to receive marketing material, we'll keep a record of this).

## 4 DISCLOSING AND SHARING DATA

We will **never** sell your personal data. If you have opted-in to marketing, we may contact you with information about our partners, or third party products and services, but these communications will always come from CRISPIN HAYES ASSOCIATES or the partner organisation that we are collaborating with for the relevant project.

We may share personal data with subcontractors or suppliers who provide us with services.

Where we partner with other organisations, we may also share information with them (for example, if you submit a survey response being jointly organised by us and another organisation). We'll only share information when necessary and we'll make sure to notify you first.

## 5 MARKETING

From 30<sup>th</sup> April 2018, CRISPIN HAYES ASSOCIATES will ask its contacts to “opt-in” for most communications. This includes all our marketing communications (the term marketing is broadly defined and, for instance, covers information about our projects and CRISPIN HAYES ASSOCIATES).

This means you'll have the choice as to whether you want to receive these messages and be able to select how you want to receive them (post, phone, email, text).

You can decide not to receive communications or change how we contact you at any time. If you wish to do so please contact us by emailing [marketing@eco-consultancy.co.uk](mailto:marketing@eco-consultancy.co.uk) or writing to Crispin Hayes Associates, 23 FRIC, Methil Docks Business Park, Fife, KY8 3RS or telephoning 0845 458 8335 (Lines open 9am – 5pm, Mon – Fri).

### **What does ‘marketing’ mean?**

Marketing does not just mean offering things for sale, but also includes news and information about:

- our organisation, campaigns and project work;
- our role in educating the public;
- volunteering opportunities ;
- appeals and fundraising (including donations and also competitions, raffles etc.);
- our events, projects and local groups;
- products, services and offers (our own, and those of third parties which may interest you);
- taking part in projects (such as citizen science events); and

When you receive a communication, we may collect information about you respond to or interact with that communication, and this may affect how we communicate with you in future.

### **Blogs and other media content**

Blogs and other media content are provided as a benefit to our stakeholders. We send these out to all our stakeholders and contacts (unless you specifically ask us not to) and you can choose to unsubscribe from general marketing communications.

### **Fundraising**

For some collaborative projects, we rely on donations and support from others to continue our work. From time to time, we will contact stakeholders and other contacts with fundraising material and communications. This might be about an appeal, an event we're running, or to suggest ways you can raise funds (e.g. a sponsored event or activity, or even buying a product if CRISPIN HAYES ASSOCIATES will receive some of the proceeds).

As with other marketing communications, we'll only contact you specifically about fundraising if you've opted into to receiving marketing from us (and you can, of course, unsubscribe at any time).

## **6 RESEARCH AND PROFILING**

This section explains how and why we use personal data to build profiles which enable us to understand our contacts, improve our relationship with them, and provide a better supporter experience.

### **Analysis and grouping**

We analyse our contacts to determine common characteristics and preferences. We do this by assessing various types of information including behaviour (e.g. previous responses) or demographic information (e.g. age or location) or other information (e.g. provided by you in a survey or consultation response).

By grouping people together on the basis of common characteristics, we can ensure that group is provided with communications, products, and information which is most important to them. This helps prevent your inbox from filling up, and also means we aren't wasting resources on contacting people with information which isn't relevant to them.

### **Profiling to help us understand our contacts**

We profile contacts in terms of financial, political and practical support. For example, we keep track of the amount, frequency and value of each person's support. This information helps us to ensure communications are relevant and timely.

On occasion, we may also combine information about particular contacts with external information (such as directorships listed on Companies House, or news about an individual which has featured in the media) in order to create a more detailed profile about a particular individual.

We collect information on preferences and interests (e.g. whether you are a keen cyclist, or active in your local community) so that we know what material you are mostly likely to be interested in.

We will also obtain information about you from other sources, much of which is available on public and private databases. We do this to enhance and fill-in any gaps so that we can understand our contacts better, send you the most relevant communications and target our resources effectively.

### **Anonymised data**

We may aggregate and anonymise personal data so that it can no longer be linked to any particular person. This information can be used for a variety of purposes, such as reporting collective outcomes, or to identify trends or patterns within our existing stakeholder base. This information helps inform our actions and improve our project outcomes.

## **7 YOUNG PEOPLE**

### **Photographs, pictures, stories and competitions on our social media and publications**

We want young people to join in local community environmental projects, and there are opportunities on our social media to share their photos, stories and pictures. If we publish your child's picture, photo or story, we'll usually include their first name and age with it. If they write an article or story for us, we might also include their surname alongside it.

If your child enters a competition and is one of the lucky winners or runners-up, we'll publish their name and winning entry alongside the other winners.

**Parental permission:** If your child is under 16 then we'll need permission from you as their parent or guardian for them to enter one of our competitions or to share a picture, photo or story with us.

### **Information for parents**

We take great care to protect and respect the rights of individuals in relation to their personal data, especially in the case of children. If your child is under 16, we'll only use his or her personal data with your consent. This means that, for example, if your child wants to have his or her name or picture featured in our social media, we'll need you to confirm you're happy for us to do so.

### **Marketing and fundraising**

We won't knowingly send marketing emails, letters, calls or messages to under 16 year-olds.

Our social media sometimes include competitions or ideas about how to raise money (e.g. sponsored activities), but they are mostly just about the local environment, our organisation and ideas for things to do.

### **Youth involvement**

CRISPIN HAYES ASSOCIATES does not undertake projects or events with unaccompanied minors. We do not collect personal data from youths under 16 years old.

## 8 HOW WE PROTECT DATA

We employ a variety of physical and technical measures to keep your data safe and to prevent unauthorised access to, or use or disclosure of your personal information.

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 and contractors receive data protection training and we have a set of data protection procedures which personnel are required to follow when handling personal data.

### **Payment security**

All electronic CRISPIN HAYES ASSOCIATES forms that request financial data, or that we use to make payments to you, will use the TLS/SSL protocol to encrypt the data between browser and server.

If you use a credit card to make a payment or purchase something from our websites we will pass your credit card details securely to our payment provider. Other payment methods (e.g. paypal) are handled in a similar manner. CRISPIN HAYES ASSOCIATES complies with the payment card industry data security standard (PCI-DSS) published by the PCI Security Standards Council, and will never store card details.

Of course, 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.

## 9 STORAGE

### **Where we store information**

CRISPIN HAYES ASSOCIATES's operations are based in the UK and we store our data within the European Union. Some organisations which provide services to us may transfer personal data outside of the EEA, but we'll only allow them to do if your data is adequately protected.

For example, some of our systems use cloud services supplied by companies based in the USA. As a US company, it may be that using their products result in personal data being transferred to or accessible from the US. However, we'll allow this as we are certain personal data will still be adequately protected (as certified under the USA's Privacy Shield scheme).

### **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. For example, if you ask us not to send you marketing emails, we will stop storing your emails for marketing purposes (though we'll keep a record of your preference not to be emailed).

We continually review what information we hold and delete what is no longer required. We never store payment card information.

## 10 KEEPING YOU IN CONTROL

We want to ensure you remain in control of your personal data. Part of this is making sure you understand your legal rights, which are as follows:

- the right to confirmation as to whether or not we have your personal data and, if we do, to obtain a copy of the personal information we hold (this is known as subject access request);
- the right to have your data erased (though this will not apply where it is necessary for us to continue to use the data for a lawful reason);
- the right to have inaccurate data rectified;
- the right to object to your data being used for marketing or profiling; and
- where technically feasible, you have the right to personal data you have provided to us which we process automatically on the basis of your consent or the performance of a contract. This information will be provided in a common electronic format.

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 would like further information on your rights or wish to exercise them, please write to [privacy@eco-consultancy.co.uk](mailto:privacy@eco-consultancy.co.uk) or addressed to Privacy & Compliance Officer, Crispin Hayes Associates, 23 FRIC, Methil Docks Business Park, Fife, KY8 3RS.

We can provide you with a template subject access form which includes guidance on how to make your request (and will help us respond more quickly). Please contact us for a copy of this.

### **Complaints**

You can complain to CRISPIN HAYES ASSOCIATES directly by contacting our Privacy & Compliance Officer using the details set out above.

If you are not happy with our response, or you believe that your data protection or privacy rights have been infringed, you can complain to the UK Information Commissioner's Office which regulates and enforces data protection law in the UK. Details of how to do this can be found at [www.ico.org.uk](http://www.ico.org.uk)

## 11 COOKIES AND LINKS TO OTHER SITES

### **Cookies**

Our website uses local storage (such as cookies) to provide you with the best possible experience and to allow you to make use of certain functionality.



### **Links to other sites**

Our website contains hyperlinks to many other websites. We are not responsible for the content or functionality of any of those external websites (but please let us know if a link is not working by using the 'Contact us' link at the top of the page).

If an external website requests personal information from you, the information you provide will not be covered by CRISPIN HAYES ASSOCIATES Privacy Policy. We suggest you read the privacy policy of any website before providing any personal information.

### **12. CHANGES TO THIS PRIVACY POLICY**

We'll amend this Privacy 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.

This Privacy Policy was last updated on 14 May 2018.