Privacy Policy

Policy

The privacy and security of your personal information is extremely important to us. This privacy policy explains how and why we use your personal data, to make sure you stay informed and can be confident about giving us your information.

By using our websites, social media pages, entering a competition or providing your information you consent to our collection and use of the information you provide in the way(s) set out in this policy. If you do not agree to this policy please do not use our sites, social media pages or services.

We may make changes to this policy from time to time. If we do so, we will post the changes on this page and they will apply from the time we post them.

1. Who are we?

Hertfordshire & Middlesex Wildlife Trust (HMWT) is a leading nature conservation charity based in Hertfordshire and Middlesex. We are part of the federation of 46 Wildlife Trusts around the UK.

Within the context of this policy 'HMWT', 'we' and 'us' means the charity and its associates including:

- Hertfordshire and Middlesex Wildlife Trust (Charity Number 239863, Company Number 816710); and
- Wildlife Fundraising (Central) Ltd (Company Number 08372218) - a company owned and operated by 7 separate Wildlife Trusts, to facilitate the recruitment of new members for member trusts.

2. Our commitment to your privacy

We are committed to keeping the personal details of our members and supporters safe. This policy explains how and why we use your personal data, to ensure that you remain informed and in control of your information.

We use three key definitions to describe people mentioned in this policy. These are definitions used by the Information Commission (ICO), the UK's independent body set up to uphold information rights (www.ico.org.uk)

- '**Data subject':** this is you, one of our members and supporters. As the data subject, we respect your right to control your data.
- '**Data controller'**: this is us, HMWT. With your permission, we determine why and how your personal data is used (as outlined in this policy).
- **'Data processor'**: this is a person, or organisation, who processes your data on our behalf, with your permission. For example, this might be a mailing house who sends your membership magazine to you, on our behalf.

When we work with other organisations or individuals in this way, we always set up a written contract with them to protect your data. The third parties we work with at no point 'own' your data, so you will never hear from them independently and they will always delete your data from their systems when they have completed

the task in hand. We always send your data to partner organisations securely, to minimise the risk of it being intercepted by unknown individuals and/or organisations.

We will never sell your personal data.

3. 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.

a) To administer your HMWT membership

We collect your personal data to administer your membership, which may involve:

- Sending you your membership welcome pack when you first join us
- Processing your Direct Debit subscription payments, if you have set this donation process up with us
- Sending you your membership renewal letter
- Getting in touch should there ever be any issues processing your subscription payment.

The ICO define the lawful basis for processing your data for these purposes as 'contractual'.

b) To send you items purchased from our online shop, including event bookings

We collect your personal data to send you:

- items you have purchased from our online shop
- information about events you have booked onto.

The ICO define the lawful basis for processing your data for these purposes as 'contractual'.

c) To record your wildlife sightings

When you submit a wildlife sighting, we will collect your name, date and place of the sighting. This information will be added to our database of wildlife records by Hertfordshire Environmental Records Centre (HERC), which is hosted by HMWT and subject to HMWT's Privacy Policy.

d) To send you information about our work and ask for your opinion

We also collect your personal data so that we can send you information about our work that we feel will be of interest to you. This includes your membership magazine, fundraising appeals, events, campaigning opportunities, membership services, products, newsletter requests, feedback, competitions and other activities, as well as information about other carefully selected organisations that we work in partnership with. From time to time, we may also use your personal data to ask for your opinion about our work.

The following information is in addition to that outlined in sections a) and b) and is defined as 'direct marketing' by the ICO.

i) Joint and family membership - If you are a 'joint' or a 'family' member of our Wildlife Trust, we will address communications to all those listed on your membership and where we have the necessary consent in place. If you wish to update this at any point, please let us know.

ii) When your membership has ended - Unless we hear from you directly, we may continue to send you information about our work for up to 12 months after your membership has ended. This is just

in case your support was cancelled accidentally, by for example changing your bank account details, and you wish to update your details with us.

Your personal data also helps us to get to know you better and to develop a 'profile' of you on our secure supporter database. This 'profile' enables us to send you the information listed above in a timely and relevant way, to suit you. For example, keeping track of the donations you make to our organisation helps us to send you information about fundraising appeals that we feel you would like to hear about. Likewise, keeping a record of your wildlife interests that you may tell us about in one of our Membership Surveys, helps us to send you relevant project updates.

As defined by the ICO, we use two different lawful bases for processing your data for 'direct marketing' purposes:

i) Legitimate interest

This is where we have identified a genuine and legitimate reason for contacting you, which does not override your rights or interests.

We use legitimate interest to send you the information listed above by **post** or **telephone** (if you *are not* registered with the Telephone Preference Service, and you have given us your telephone number).

ii) Opt-in consent

This is where you have given us express permission to contact you by particular communication channels.

We use opt-in consent to send you the information listed above by **email**, **text message** (SMS) or **telephone** (if you *are* registered with the Telephone Preference Service)

We respect your right to update the way we get in touch with you about our work at any time.

e) To enable you to volunteer with us

If you are a HMWT volunteer, we collect your personal data so that we can keep in touch with you about, for example:

- changes to planned volunteer work programmes that you may be taking part in
- the positive impact you have on our work, by sending you relevant newsletters
- dedicated volunteer thank-you events.

Safeguarding of children and adults at risk: if we have concerns about a volunteer's suitability or conduct when working with young people or adults at risk we may share information with other Trusts across the federation, including the Royal Society of Wildlife Trusts, to help them make informed recruitment decisions around a candidates suitability for a role, which may not be flagged by disclosure and barring service checks or reference procedures.

As defined by the ICO, the lawful basis for processing your data for these purposes is 'contractual' (where administering your volunteer record) and 'legitimate interest' (when sending you information about our work *or* where necessary and proportionate, to safeguard children, young people and adults at risk).

f) To buy or sell goods or services

We collect personal data to comply with contractual responsibilities when we buy and sell goods and services from and to others.

The ICO define the lawful basis for processing personal data for these purposes as 'contractual'.

g) To meet our legal obligations

We collect personal data in order to comply with legal obligations such as providing information to bodies such as HMRC, Charity Commission, Companies House and HSE.

The ICO define the lawful basis for processing personal data for these purposes as ‘legal obligation’.

h) To enable effective functioning of our organisation

We collect personal data to enable the Trust to operate effectively in a variety of ways such as:

- responding to complaints and comments
- complying with regulators eg Fundraising Preference Service, Fundraising Regulator
- fundraising efficiently and effectively
- safeguarding, health and safety, security
- maintaining records of reserve management and local wildlife sites
- maintaining biological and geological records
- liaising with landowners and tenants about conservation activities
- running engagement activities such as events and competitions
- evaluating events, campaigns and website activity
- research and statistical analysis

The ICO define the lawful basis for processing personal data for these purposes as ‘legitimate interest’.

4. What kind of personal data do we collect? How do we collect it?

a) Basic information

We will usually collect basic information about you, including your name, postal address, telephone number, email address and your bank details if you are supporting us financially.

Most of the time, we collect this data from you directly. Sometimes this is in person; other times, it is over the telephone, in writing, using a web-based form, or through an email. Occasionally we obtain information, such as your telephone number or other contact details, from external sources *(only where you have given permission for such information to be shared)*.

b) Getting to know you better

We also collect information about you that helps us to get to know you better. This may include:

- information about your wildlife interests, which you tell us through membership or other supporter surveys
- records of donations you have made, for example towards fundraising appeals
- details of purchases you have made, for example wildlife gifts or sponsorships
- your preferences of how you would like us to contact you
- ways you have helped us through volunteering your time
- records of events you have attended, or campaigns or activities that you have been involved in.

Sometimes we will collect other information about you such as your date of birth and gender. When we do so, we will be very clear as to why we are collecting such information, and we will only do so with your specific consent and permission.

As a fundraising organisation, we may gather information about you from publicly available sources, such as Companies House, the Electoral Register, company websites, social networks or property registers. We may occasionally use profiling and wealth screening services provided by trusted third party organisations. These processes enable us to better understand and develop your relationship with us and ensure any requests for support are appropriate, proportionate and tailored.

We may also use publicly available sources to carry out due diligence on donors or potential donors, in line with our fundraising policies and to meet money laundering regulations

If you would rather your personal data was not used in these ways, or have any questions then please contact us.

Director of Development

Telephone: 01727 858901

Email: info@hmwt.org

Grebe House, St Michael's Street, St Albans, AL3 4SN

Our office hours are Monday – Friday, 9am – 5pm.

Other ways in which we collect personal data to get to know you better include:

c) Our 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 would expect
- Remember your settings during and between visits
- Improve the speed/security of the site
- Allow you to share pages with social networks like Facebook
- Continuously improve our website for you

For more information, see our Cookies Policy.

Our websites contain links to third party websites that we believe may be of interest to our website visitors. This privacy policy only governs our website and we are not responsible for the privacy policies that govern third party websites even where we have provided links to them. If you use any link on our website we recommend you read the privacy policy of that website before sharing any personal or financial data.

d) Sensitive personal data

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

When we do so, we will be very clear as to why we are collecting such information, and we will only do so with your specific consent and permission. In these situations, we collect the data from you directly.

If you are a volunteer or applicant for work or member of staff then we may collect extra information about you, for example:

- references
- criminal records checks
- details of emergency contacts
- medical conditions

We may also collect sensitive personal data if you have an accident on one of our reserves. This information will be retained for legal reasons, for safeguarding purposes and to protect us (including in the event of an insurance or legal claim). If this does occur, we will take extra care to ensure your privacy rights are protected.

e) Children and young people

In line with UK Data Protection legislation, we will not collect, store or process your personal details if you are under 13 years of age; unless we have the express permission from your parent or guardian to do so.

If we have the permission of your parent or guardian, and you are a Wildlife Watch member, we will capture your date of birth at the point of joining. This is so that we can send you information that we feel is suitable to your age.

For further information, please contact us for details of our Safeguarding Children and Adults at Risk Policies.

5. How do we store your data?

a) Security

All of the personal data we process is processed 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 and when we, and our IT provider, have satisfied ourselves that the security of these servers and the data they hold exceeds the minimum standards required under UK and EU legislation

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

b) Payment security

All electronic HMWT forms that request financial data will use the Secure Sockets Layer (SSL) protocol to encrypt the data between your browser and our servers.

If you use a credit card to donate, purchase a membership or purchase something online we will pass your credit card details securely to our payment providers:

- Stripe and Paypal on our website; and
- iZettle for mobile or 'pop-up' shop locations.

Herts & Middlesex 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.

c) CCTV

Some of our premises have CCTV and you may be recorded when you visit them. CCTV is there to help provide security and to protect both you and HMWT. CCTV will only be viewed when necessary (e.g. to detect or prevent crime) and footage is only stored temporarily after which it will be recorded over. HMWT complies

with the Information Commissioner's Office CCTV Code of Practice, and we put up notices so you know when CCTV is in use.

d) Data retention policy

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

For further information on our data retention policy please contact us.

6. Your rights

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

a) 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.

b) 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.

c) The right to rectification

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

d) The right to erase

You can ask us to remove or randomise your personal details from our records.

e) The right to restrict processing

You can ask us to stop using your personal data.

f) The right to data portability

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

g) The right to object

You can ask to be excluded from marketing activity.

h) 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.

7. Making a complaint

Herts & Middlesex Wildlife Trust want to exceed your expectation in everything we do. However, we know that there may be times when we do not meet our own high standards. When this happens, we want to hear about it in order to deal with the situation as quickly as possible and put measures in place to stop it happening again.

We take complaints very seriously and we treat them as an opportunity to develop our approach. This is why we are always very grateful to hear from people who are willing to take the time to help us improve.

Our policy is:

- To provide a fair complaints procedure that is clear and easy to use for anyone wishing to make a complaint.
- To publicise the existence of our complaints procedure so that people know how to contact us to make a complaint.
- To make sure everyone in our organisation knows what to do if a complaint is received.
- To make sure all complaints are investigated fairly and in a timely way.
- To make sure that complaints are, wherever possible, resolved and that relationships are repaired.
- To learn from complaints and feedback to help us to improve what we do.
- All complaint information will be handled sensitively, in line with relevant data protection requirements.
- Complaints will be acknowledged within 3 days and responded to without undue delay.

You can see the Trust's full Complaints Policy here.

Complaints about how we look after your personal data should be made to the **Director of Development** at the Trust within 30 days of the incident or communication about which the complaint is made.

Director of Development

Telephone: 01727 858901

Email: info@hmwt.org

Grebe House, St Michael's Street, St Albans, AL3 4SN

Our office hours are Monday – Friday, 9am – 5pm.

For further assistance with complaints regarding your data, please contact the Information Commission Office, whose remit covers the UK, by visiting the dedicated ICO webpage.

ICO Head Office, 4th Floor, No.3 Circle Square, 5 Hawkshaw Street, Manchester M1 7BL

8. Social media sites

We operate a number of social media pages (including Facebook, Instagram, X, LinkedIn, Bluesky,, Threads and YouTube). Although this policy covers how we will use any data collected from those pages it does not cover how the providers of social media websites will use your information. Please ensure you read the privacy policy of the social media website before sharing data and make use of the privacy settings and reporting mechanisms to control how your data is used.

9. Sharing data

The Wildlife Trusts is made up of 47 individual charities that work closely together in a federated structure through their membership of The Royal Society of Wildlife Trusts, a memorandum of co-operation and a collective strategic direction. The Wildlife Trust federation also includes a range of subsidiaries, wholly owned

by either an individual or group of Wildlife Trusts. Whilst operating collectively within a federated structure, it is recognised that each party is an independent organisation. To aide our collaboration as a federation, we sometimes share data with each other for the purposes listed below. At all times we follow the principle of data minimisation as set out in UK GDPR and where possible or appropriate will anonymise or pseudonymise data before it is shared.

The Wildlife Trusts have identified the following broad purposes for data sharing and processing.

People & Community:

- To deepen understanding of and enhance engagement with current and potential supporters, improving inclusivity, recruitment and retention experiences.
- To gain insights into supporter and public behaviour through research and data analysis.
- To support education and training.
- To foster community building, health initiatives, and empower local networks.

Business Operations

- To identify funding opportunities, resources, and drive cost efficiencies.
- To facilitate delivery of shared services across The Wildlife Trusts' federation.
- To establish benchmarking, KPIs and qualitative data analysis that measure and communicate our collective impact.
- To uphold safety and ensure compliance with shared policies, regulatory and industry best practices.
- To facilitate appropriate safeguarding measures across the federation to protect children and adults at risk.
- To improve understanding of our Partners, including corporates, through collaborative business intelligence.
- To support the experience, retention, training and recruitment of Staff, Trustees, and Volunteers.
- To explore and implement emerging technologies (e.g., Artificial Intelligence, Machine Learning, Internet of Things) that enhance conservation impact, operational efficiency, and supporter engagement across The Wildlife Trusts.
- To enhance collaboration with partners locally, nationally and globally.
- To support the digital transformation and data maturity of The Wildlife Trusts.

Conservation

- To identify, commission and/or contribute to external research efforts

  locally, nationally or globally, that enhance The Wildlife Trusts' conservation impact.
- To support environmental conservation and research locally, nationally or globally.
- To support international, national and local campaigns and advocacy.

Data sharing across The Wildlife Trusts federation is governed by a comprehensive collective Data Sharing, Processing and Joint Controllership Agreement.

10. Get in touch

Should you wish to find out more about the information we hold about you, or about our privacy policy, please contact us:

Director of Development

Telephone: 01727 858901

Email: info@hmwt.org

Grebe House, St Michael's Street, St Albans, AL3 4SN

Our office hours are Monday – Friday, 9am – 5pm.

We review this policy annually and update as required. We may make updates from time-to-time without notice. We therefore advise you to consult this policy frequently.

Last updated: October 2026