

## The National Association for Areas of Outstanding Natural Beauty Privacy Policy

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### The National Association for Areas of Outstanding Natural Beauty

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## Who are we?

The National Association for AONBs (NAAONB) is a charity that provides a strong collective voice for the UK's 46 Areas of Outstanding Natural Beauty (AONBs). Its objectives are to

- promote the conservation and enhancement of AONBs,
- advance the education, understanding and appreciation by the public of AONBs, and
- promote the efficiency and effectiveness of those promoting or representing AONBs, other Protected Areas and those areas for which designation might be pursued.

## Our commitment to your privacy

We are committed to keeping your personal details 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 Commissioner's Office (ICO), the UK's independent body set up to uphold information rights ([www.ico.org.uk](http://www.ico.org.uk))

- 'Data subject' - this is you. As the data subject, we respect your right to control your data.
- 'Data controller' - this is us, the NAAONB. 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. For example, this might be a consultant working on a project or piece of research who needs access to your contact details in order to communicate with you.

When we work with other organisations or individuals in this way, we ensure your data is protected. 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.

## 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.

The NAAONB is part of a protected landscape network and we strongly believe that collaboration is the most effective way of achieving shared objectives.

Our protected landscape network is made up of the 46 AONB Partnerships and Conservation Boards (the AONB Family), as well as countryside agencies bodies such as Defra, Natural Resources Wales, Natural England, National Parks Authorities, and affiliated organisations such as, Campaign for National Parks, Heritage Lottery Fund, Campaign to Protect Rural England.

The NAAONB collects your personal data, in the form of contact details for our membership organisations, and, in order to carry out day to day business. This information may also be shared as part of our day to day collaborative work amongst our wider network.

The ICO defines the lawful basis for processing your data for these purposes as 'legitimate interests'.

The NAAONB also collects personal data of the attendees who book to attend events it organises. This data is collected to administer the event and is deleted within six months following the end of the event, this allows for event feedback to be sought by means of a survey. Any data regarding event attendees retained beyond six months will not include personal data. A small portion of this data is classified as special category data - this is in the form of details about any relevant medical conditions. Supply of this information is optional and is used in order to adequately provide health and safety measures for the event.

The ICO define the lawful basis for processing your data for these purposes as 'legitimate interests' with 'consent' specifically for the special category data.

The NAAONB runs a protected landscape collaboration platform in the form of an online forum called Basecamp. Users have the benefit of collaborating on national matters, and, while their names and email addresses are accessible by all signed up, they are never signed up without this first being explained to them and are able to unsubscribe at any time.

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

We collect data from a cohort of 40 AONB staff as part of the Future Landscapes Programme, a Personal and Professional Development programme called Taking the Lead. Those nominated for the programme undertake a self-assessment questionnaire to understand how they work most effectively, using the Lumina Spark psychometric profiling. A Personal Profile is generated based on how the participants answer the questionnaire.

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

A marketing platform for small businesses called Mail Chimp is used to aid us in distributing our newsletter to those who have signed up to receive it, users are able to unsubscribe at any time.

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

- i) Legitimate interests**  
This is where we have identified a genuine and legitimate reason for contacting you, which crucially does not override your rights or interests.
- ii) Opt-in consent**  
This is where you have given us express permission to contact you by particular communication channels.

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

## **What kind of personal data do we collect? How do we collect it?**

**Contact details of AONB Partnership and Conservation Board staff and members** (including Chairmen, JAC members etc).

This includes names and email addresses - business email where possible. If personal email addresses are supplied (usually for Chairmen) these are stored separately, and shared only with consent. This information is gathered via the partnership.

**Contact details for the wider membership.**

This includes names and email addresses - business email where possible. If personal email addresses are supplied (usually for friends of societies) these are stored separately, and shared only with consent. This information is gathered via the member organisation and used for administering the membership.

**Financial contact details for our suppliers and customers.**

These are generally the contact and bank details for organisations, in rare cases they are individuals, for instance when we have worked at the sole trader or consultant. This information is stored securely (password protected) in our finance software Xero and on our Lloyds internet banking website. These details are refreshed annually (old details are deleted or archived) and never shared.

**Basecamp**

We use the open source online collaborative working tool, Basecamp. The NAAONB and wider AONB network use Basecamp to collaborate on national work. It is an invitation only, password protected discussion forum available to all staff at our member organisations as well as trusted partner organisations. Users of Basecamp are able to communicate with colleagues all over the United Kingdom, who have similar interests and passions. Once signed up, your name and email address is available to all involved (this is highlighted as part of the invitation to join). Your involvement in Basecamp is opt-in and you can unsubscribe at any time. As we use Basecamp, by signing up your information will be processed by Basecamp in accordance with their privacy policy and terms which can be viewed on the [Basecamp privacy page](#) on their website (please note this is an external website).

**E-Newsletter**

Should you choose to subscribe to our e-newsletter we obtain your email address via a webform, email addresses provided in this way are never shared, and, by subscribing you are consenting to marketing from us. This is opt-in and you can unsubscribe at any time. As we use MailChimp to automate our e-newsletters, by subscribing your information will be processed by MailChimp in accordance with their privacy policy and terms which can be viewed on the [MailChimp privacy page](#) (please note this is an external website).

**Landscapes for Life website**

Our website collects information via embedded forms to gather subscribers to our e-newsletter, on our contact form to take enquiries, and, to take bookings on national events we run. The detail of the information collected is included in the descriptions above.

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.

That is because we use Google Analytics, a popular web analytics service which uses cookies to help us to count the number of people that visit AboutCookies.org and to analyse how they use it (e.g. we can determine which pages on our site are the most popular ones).

The information generated by the cookies about your use of our website (including your IP address) will be transmitted to and stored by Google on servers in the United States. Google will use this information for the purpose of evaluating your use of our website, compiling reports on website activity and providing other services relating to website activity and internet usage. Google may also transfer this information to third parties where required to do so by law, or where such third parties process the information on Google's behalf. Google undertakes not to associate your IP address with any other data held by Google.

We may also store information about you using cookies (files which are sent by us to your computer or other access device) which we can access when you visit our site in future. We do this to enhance useability for partially sighted people by allowing the page colours to be altered to suit the viewer. If you want to delete any cookies that are already on your computer, please refer to the instructions for your file management software to locate the file or directory that stores cookies. Information on deleting or controlling cookies is available at [www.aboutcookies.org](http://www.aboutcookies.org). Please note that by deleting our cookies or disabling future cookies you may not be able to access certain areas or features of our site.

#### **Lumina Spark data**

The data collected by the NAAONB when a participant on the programme uses the Lumina Spark product is twofold (based on the [Lumina Learning Privacy Policy](#)).

- "Profile Data": when a participant creates a Lumina Learning account, they provide data such as name, email address, gender, pronoun preferences, date of birth, education details and demographic information.
- "Task Data": when a participant completes their questionnaire (the task) as required by the NAAONB, their responses is shared with Lumina Learning and the output is held by the NAAONB (in the form of a Personal Profile report).

#### **Sensitive personal data**

We do not normally collect or store sensitive personal data (such as information relating to health, beliefs or political affiliation). However, for our national events data on delegate's existing medical conditions may be requested in the interest of health and safety. Additionally, some of the data collected via the Lumina Spark profiling can be considered sensitive.

When this is gathered, we will be very clear as to why we are collecting such information, and we will only do so with specific consent and permission. In these situations, we collect the data from you directly, and the data will only be retained until stated in the data retention policy below [Annex 1](#)

#### **Children and young people**

In line with data protection law, we will not collect, store or process your personal details if you are under 13 years of age.

## 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.

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.

### b) Payment Security

The NAAONB is only able to take and receive payment by electronic bank transfer. Bank details supplied to us are stored in our Lloyds Online banking system, and, where they have been provided on invoices, these invoices are stored in the following places.

- As PDFs on our password protected computers
- As PDFs on Xero, our finance software (password protected)
- occasionally as hard copies in a locked filing cabinet.

We work with a third-party Whittingham Riddell who provide accounting and bookkeeping support, data is shared with them, their privacy policy can be viewed by visiting the [Whittingham Riddell's privacy page](#) on their website (please note this is an external website).

### c) CCTV

The NAAONB has no premises and no CCTV.

### 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 Record Retention Policy, please see our [Annex 1](#) at the end of this document.

## 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](#).

## **Making a complaint**

The National Association for Areas of Outstanding Natural Beauty wants 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.

### **Confidentiality**

All complaint information will be handled sensitively, in line with relevant data protection requirements.

### **Responsibility**

Overall responsibility for this policy and its implementation lies with the Chief Executive.

### **How to make a complaint**

Complaints should where possible be in writing and sent to [office@landscapesforlife.org.uk](mailto:office@landscapesforlife.org.uk)

The National Association for Areas of Outstanding Natural Beauty  
Belmont House  
Shrewsbury Business Park  
Shrewsbury  
Shropshire  
SY2 6LG

For further assistance with complaints regarding information rights practices (data protection), advice can be sought from the Information Commissioner's Office. [casework@ico.org.uk](mailto:casework@ico.org.uk)  
Information Commissioner's Office  
Wycliffe House  
Water Lane  
WILMSLOW  
SK9 5AF

0303 123 1113

## **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.

## **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.

National Association for AONBs  
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Shrewsbury Business Park  
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Shropshire  
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[office@landscapesforlife.org.uk](mailto:office@landscapesforlife.org.uk)

We update this policy periodically.  
Last updated: September 2018

## ANNEX 1 - Data Retention Policy

Data set	Retention
AONB Partnership and Conservation Board staff contact details	This data is refreshed annually, inaccurate or out of date data is deleted.
Membership contact details	This data is refreshed annually, inaccurate or out of date data is deleted.
Finance data	This data is archived when no longer in use.
National event bookings	Data retained for six months following end of event - to allow for feedback surveys.
Basecamp users	Users are able to unsubscribe at any time by contacting <a href="mailto:basecamp@landscapesforlife.org.uk">basecamp@landscapesforlife.org.uk</a>
Lumina Spark profiles	Lumina Learning will retain data for seven years from when a user last signed in to their Lumina Account, to allow continued access to their Lumina Account and its features (see " <a href="#">Retention of Your Data</a> " on the Lumina website (please note this is an external website). The NAAONB will continue to have access to the data within that timeframe.
Newsletters	Subscribers are able to unsubscribe at any time by clicking the unsubscribe link at the bottom of newsletter emails.