



# ANGLING TRUST

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**Angling Trust**

Data Privacy Policy

<b>DOCUMENT CONTROL SHEET</b>			
<b>Key Information</b>			
<b>Document title:</b>	Data Privacy Policy		
<b>Applies to:</b>	<b>Angling Trust *</b>	<b>Fish Legal*</b>	<b>ACA Trustee Co*</b>
	<i>*Delete as applicable</i>		
<b>Document ref:</b>	PD16		
<b>Version No:</b>	1.1		
<b>Document Owner:</b>	Alistair Middleton		
<b>Lead Director:</b>	TBC		
<b>Review frequency:</b>	Biennial		
<b>Next review date:</b>	Nov 2021		
<b>Objective</b>	To provide the process by which the Angling Trust may store and use data in line with current legislation.		

<b><u>Revision History and GC Approvals</u></b>			
<b>Version</b>	<b>Date</b>	<b>Summary of Changes</b>	<b>Name</b>
1.0	Nov 2018	New document presented to Board	
1.1	Nov 2019	Document reviewed by owner, minor formatting changes	Alistair Middleton

<b><u>Adopted for Implementation</u></b>			
<b>Adopted by: ATB/ FLC</b>	<b>Date</b>	<b>Version</b>	
ATB	Nov 2018	1.0	

<b><u>Distribution:</u></b>				
<b>Audience</b>	<b>Method</b>	<b>By whom</b>	<b>Date of Issue</b>	<b>Version</b>
Staff/ Directors/Volunteers	Email/ Website/ Sharepoint			
Staff, Directors and Volunteers				

**We believe that the lawful and correct treatment of personal information is critical to our success as an organisation and to maintain our members' confidence in us. We recognise that, to maintain our reputation and integrity we must be fully compliant with Data Protection legislation.**

## INTRODUCTION

This privacy statement sets out the way we process your information. We will always refer to this statement when we ask for your consent. We will keep this statement updated to show you all the things we do with your personal information so that you can be confident that when you share your information with us it will only be used for what we say here. The Angling Trust is a data controller and data processor. Fish Legal is a data controller using Angling Trust to process membership information.

## WHAT PERSONAL DATA DO WE COLLECT?

For individual members we only collect data that we need to administer your membership such as name, address and email. We do not store your payment details, transactions are carried out by a "payment gateway"

For organisation members we collect data from you as the registered contact for your organisation which in many cases includes your personal data as the contact point such as name, address, email and your position. We do not store your payment details, transactions are carried out by a "payment gateway".

## HOW WE USE PERSONAL DATA

We need to collect and use certain types of personal information about the people we deal with such as current, past and prospective employees, members, affiliates, suppliers and others with whom we communicate. We may occasionally be required by legislation to share certain types of personal information to comply with the requirements of government departments, agencies and regulators.

Personal data may be collected verbally, online or by correspondence and may be used for the following purposes:

- Administration of membership(s)
- Administration of donations and legacies
- For compliance with legal obligations
- We may need to share your information with our trading subsidiaries, service providers, insurers, associated organisations and agents.
- Communication about membership, such as AGM and annual report
- External communications such as press releases and articles

Personal Data collected and processed by us may be shared with the following groups where necessary:

- Angling Trust staff and volunteers
- Fish Legal staff and volunteers
- Under strictly controlled conditions:
  - Contractors
  - Advisors

- Agents

When we allow access to your information we will always have complete control of what they see, what they are allowed to do with it and how long they can see it for. We do not sell or share your personal information.

## CONTROL

You are always in control of how we communicate with you. You can update your choices by contacting us via phone, email, postal address or via our Trust website.

Angling Trust and Fish Legal always acts upon your choices around what type of communications you want to receive and how you want to receive them. However, there are some communications that need to happen regardless of your marketing preferences. These are described as “essential Communications” and are necessary to fulfil our promises to you as a member. Examples of this type of communication would include but are not restricted to:

- Transaction notification messaging, such as credit card payment or Direct Debit notification
- Membership related mailing such as renewal reminder, our regular magazine and AGM statements

## DATA SUBJECT RIGHTS

Under GDPR you (as the data subject) have the following ‘consumer rights’ which we will adhere to:

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- Your right to access to information.
- Your right of correction, technically known as the right to rectification.
- Your right to be forgotten (*erasure*).
- Your rights in the scope of consent (*if that’s the legal ground for processing*).

## RETENTION

We hold your data only for as long as we need it for meeting legal and business data archival requirements. For example, membership data will be held for 2 years following the expiry of membership, after which all your personal data will be deleted from our systems. Information about financial transactions will be retained for the statutory 7 years and then deleted. Data held by Fish Legal similarly will be retained for 7 years to take into account the Limitation Act 1980.

## CONSENT

Where we need your consent, we will ensure that you are always as fully informed as possible about what we do with your information, with whom it may be shared and how long we will keep it. This is in line with current Data Protection Regulation.

## PAYMENT CARD INFORMATION

The Angling Trust has an active PCI-DSS compliance programme in place. This is the international standard for safe card payment processes. As part of our compliance to this very stringent standard, we ensure that our IT systems do not directly collect or store your payment card information; for example, the full 16-digit numbers on the front of the card or the security code on the back.

Our online payment solutions are carried out using a 'payment gateway' which is a direct connection

to a payment service provided by a bank. This means that when you input card data into the payment page, you are communicating directly with the bank and the bank passes your payment to us, this means that your payment card information is handled by the bank and not processed or held by us.

### **HOW WE PROTECT YOUR 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 receive data protection training and we have a set of detailed data protection procedures which personnel are required to follow when handling personal data

If you would like further information on your rights or wish to exercise them, please write to us at Angling Trust, Eastwood House, 6 Rainbow Street, Leominster, HR6 8DQ