

INFORMATION HELPS MAKE CONSERVATION HAPPEN

At WWF-UK we rely on the generosity and support of individuals like you to carry out our vital conservation work. That is why we want to be completely transparent about why we need the personal details we request when you engage with us and how we will use them.

As you browse our website and whenever you communicate with us, we collect information. It deepens our understanding of what works and what doesn't, which helps make our communications more effective. The more we understand about our supporters and the people we engage with, the more efficiently we are able to operate and the more funds we can direct into conservation.

We take protecting your privacy very seriously and will always take all reasonable steps within our power to make sure your information is safe.

This privacy policy applies to all personal information we collect or process about you.

'Personal information' is information, or a combination of pieces of information, that could reasonably allow you to be identified.

Please read this policy carefully, along with our Terms and Conditions and any other documents referred to in this policy, to understand how we collect, use and store your personal information.

We may update this policy from time to time without notice to you, so please check it regularly, particularly if you are sending personal information to us. Any significant changes will be notified to you.

If you have any questions please contact our Supporter Care team on **01483 426 333**, write to us at: The Living Planet Centre, Brewery Road, Woking, Surrey, GU21 4LL or visit https://www.wwf.org.uk/contact-us

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1. WHO WE ARE

WWF-UK is part of the WWF global network which operates in over 100 countries around the world. All country offices work collaboratively with a common mission of creating a future where people and nature thrive. We are known as WWF-UK to distinguish ourselves from our sister organisations from other countries. This privacy policy relates to the information which is obtained and processed by WWF-UK only.

WWF-UK is comprised of both a charity and a trading company. In this policy, whenever you see the

words 'we', 'us' or 'our', it refers to both our charity and our trading company.

Our trading company is wholly owned and controlled by our charity. Any information we collect may be used by both entities. Our trading company exists so that we can support our charitable activities including running our online shop and allowing others to use our brand, in support of our charity.

Our charity is WWF-UK (company no. 04016725 and registered charity no. 1081247 in England and Wales and no. SC039593 in Scotland). Our trading company is WWF-UK (Worldwide Fund for Nature) Trading Ltd (company no. 892812). Both of these organisations are Data Controllers.

2. WHY WE COLLECT INFORMATION

FOR A FUTURE WHERE PEOPLE AND NATURE THRIVE

To build a future where people live in harmony with nature we need to have effective communications and fundraising activity. By understanding more about how people use the information we provide, we can improve how we communicate the most important messages that you need to hear.

TO DELIVER IMPORTANT INFORMATION ABOUT WHAT YOU CAN DO FOR YOUR PLANET AND HOW YOUR SUPPORT HELPS

We can broadcast information on TV, in the news and on our website, but if we can talk to you directly or deliver it straight to your doorstep or to your inbox, we can be sure that you get to know exactly what you can do to help as soon as it happens.

TO SAVE MONEY

We never do anything without carefully considering how much it costs. Collecting information about you and what grabs your attention allows us to work out the most efficient way to do things so that more funds can be directed into conservation.

3. WHEN WE COLLECT INFORMATION, WHAT INFORMATION WE COLLECT, HOW WE COLLECT IT AND WHAT WE USE IT FOR

We collect information every time you interact with us. The type and quantity of information we collect and how we use it depends on why you are providing it.

3.a. WHEN WE COLLECT INFORMATION

There are many instances in which we may collect information about you. For example, we may collect information when you:

- Become a member of WWF, adopt an animal or become a tiger protector
- Join Team Panda, volunteer with us, participate in an event or visit The Living Planet Centre
- Make a donation to us, buy something from our online shop or make a pledge to leave us a gift in your Will
- If you are a teacher and you sign up for our education resources or take part in our Schools

- and Youth programmes
- Support our campaigns such as action to stop the ivory trade, Earth Hour and Saving Our Shared Heritage
- Subscribe to our e-newsletters, request information from us or join a campaign
- When you visit one of our websites or social media pages via tools such as cookies and online identifiers, including if you make comments on our message boards or discussion forums
- Apply for a job with us
- Contact us or become involved with us in any other way than as stated above.

3.b. WHAT INFORMATION WE COLLECT

- The information we may collect from the above interactions may include, but is not limited to any of the following:
- Your name, address, telephone number, mobile number, and email address, along with your preferences as to how we should contact you in the future
- We may collect your year of birth or date of birth in order to verify you are an adult as it is our
 policy not to market to children and there are some services we are not able to provide
 to under 18's
- Financial and credit card information which you give to us, including your gift aid status (note that we do not store credit card information)
- Information you enter onto our website, including information to take part in challenge events
 or to volunteer with us (such as your date of birth and contact information). When you
 enter a challenge event you will be asked by the organisers to complete the official
 event console which may require providing information on your medical history and
 next of kin. This information is never passed to WWF
- Records of your donation history, correspondence and campaign actions taken with us
- Images, photographs or video if you volunteer or take part in an event with us
- Details of your visit to our websites, including technical information such as the IP address you use to access the website, your device, browser type and version
- We might also obtain personal data about individuals who may be interested in giving major gifts to organisations like ours. In these limited cases only, in addition to information you give us directly, we may also collect information about you from publicly available sources such as your work or interests
- Any other details in which you give us including your reasons for supporting us.

Note: If you're adopting an animal or buying membership as a gift for someone else, we'll need their name and address to send their pack and updates to, but we won't contact them about anything else unless they ask us to.

In limited and specific circumstances, we might collect special categories (sensitive personal data) of information from you. These circumstances include:

If you apply for a job with us. In this case, we may collect information about your race
or ethnicity, religious or philosophical beliefs, political opinions, sexual orientation or
data concerning health and disabilities. This information will only be used for equal

opportunities monitoring and no other purpose. We may also collect information about criminal convictions if it is appropriate given the nature of the role and where we are legally able to do so. You will be provided with a separate data protection policy when the information is requested so you are aware of how your data will be collected, used and stored.

 If you have been specifically asked to participate in an equal opportunities monitoring survey and you provide your consent for us to do so. The data will only be used for the stated purpose and kept no longer than is necessary for that purpose. Where possible we will collect the information on an anonymous basis so that you cannot be identified. You reserve the right to withdraw your consent to us keeping this data at any time.

3.c. HOW WE COLLECT INFORMATION ABOUT YOU

We use different methods to collect data from and about you including through:

Direct Interaction

We get information directly from you, for example when you become a member of WWF or sign up for an adoption with us. For information about when we may collect data about you, see WHEN WE COLLECT INFORMATION

Automated technologies or interactions

If you enter your details onto one of our online forms, and you don't 'send' or 'submit' the form, we will automatically contact you via email to see if we can help with any problems you may be experiencing with the form or our websites.

Similarly if you receive an email, open it, don't open it, select a link, browse our website, we collect this information so we can see which stories are popular and which aren't. And next time we'll do better so that more people will be inspired by the work they are helping to achieve.

When we're seeing what people do online like this, we're using cookies. Accepting cookies from us helps direct more funds into conservation. If you don't want cookies, you can set your browser to notify you when you receive one, then choose to decline it. Please read our Cookies Policy for more information. Please note that if you disable or refuse cookies then some parts of our websites may become inaccessible or not function properly.

Third parties or publicly available sources

Change of address

Where possible we use publicly available sources to keep your records up to date; for example, we use the Royal Mail's National Change of Address Database (NCOA LINKTM). This allows us to better direct our resources and efforts. Writing to you can be expensive and we want to be sure that our charitable resources are best used, and not write to you if you no longer live there. If you have moved house then please update us, or sign up for the National Change of Address Database – we will only use this information if you have checked the box to say third parties can see

your updated information.

Bereavements

We regularly check for deceased and gone away records to manage customer relationships, protect brand reputation and ensure data remains accurate, up to date and compliant.

An external agency manage our data cleaning activity, and to screen for deceased persons we match individuals against certain source lists deemed the most reliable and these are updated regularly. Those sources may include; The National Deceased Register, Mortascreen which is predominantly sourced from the UK probate registries, The Bereavement Register which gathers permissioned, verified registration data directly from the bereaved, and Mortality Suppressions from Experian.

When administering legacies, generally, we rely upon information provided to us by Executors/Administrators appointed by the Will and, where appropriate, we may use the government's Probate Search facility in order to obtain a copy of the Will. We may also be informed by third parties of the death of supporters particularly if we are named as a beneficiary in a Will.

Postcode Analysis

We use Mosaic, a database system which can give us summarised data at postcode level. This helps us understand the demographic make-up of geographical areas of the UK and helps us understand the types of people who live in different parts of the country. We do not get individual information from this system — we only get information on averages within an area. This information helps us to send more effective marketing communications which we hope you will be interested in, and thus allows us to better use our resources.

Social Media

We may obtain your personal information through your use of social media such as Facebook, Twitter or LinkedIn, depending on your settings or the privacy policies of these social media services. To changes your settings on these services, please refer to their privacy policies which will tell you how to do this.

Third parties

In signing up for a service, you may have agreed for your data to be passed to other organisations such as ours. Where we use this data we check that we are entitled to by reviewing the privacy notice of that third party to ensure that it informs people that their data may be passed to us. An example of where we do this is with a teacher database, where by agreeing to join the teacher database, you agree that your information will be made available to other organisations. We may use this information to contact you about our schools and youth programmes or teacher resources related to our mission.

Desktop Research

In a very limited number of cases, we may use desk research, profiling and screening techniques to analyse your personal information to create a profile of your interests and preferences so that we can contact you with information relevant to you, to be prepared when we meet you, or to help us find others like you who might like to show their support. We do this because it allows us to make appropriate and relevant approaches and target our resources more effectively, which donors consistently tell us is a key priority for them. We may make use of additional information about you, including geo-demographic information and measures of affluence. We may on occasion use third party suppliers to undertake these activities on our behalf and provide them with your information to the extent required.

Such information is compiled using publicly available data about you, for example addresses, listed Directorships, social media posts, newspaper articles or typical earnings in a given industry. This helps us understand the background of the people who do or may support us and helps us to make appropriate requests for gifts to supporters who may be able and willing to give more than they already do and/or leave us a gift in their will. Collating this publicly available information helps us better understand your motivations and preferences enabling us to deliver a more targeted and relevant donor experience. Additionally, it enables us to raise more funds, sooner, and more cost-effectively than we otherwise would.

3.d. WHAT WE USE YOUR INFORMATION FOR

We use personal data for a number of different processing activities which includes:

- Providing you with the goods or services you have requested
- Keeping you up to date with the work you are supporting and the latest conservation news
- Administering your donation, including processing Gift Aid
- Keeping a record of your relationship with us
- Asking for financial and non-financial support
- Managing your communication preferences, including marketing preferences
- Understanding how we can improve our services, products or information
- Sending you tailored communications and displaying relevant adverts which we think will be of interest to you
- Sending you marketing materials including on fundraising, campaigning and events
- Inviting you to events and to take part in campaigns and support our advocacy work
- Analysing our database for statistical purposes, and to better communicate with you about things we think will be of interest. Note that this is on a generic rather than an individual level to ensure that our communications are cost effective
- In limited circumstances, analysing the personal information we collect about you and using
 publicly available information to better understand your interests, preferences and level of
 potential donations so that we can contact you more effectively and be better prepared in
 special circumstances when we may meet with you
- Sending you details of products you can buy on our online shop and giving you information
 on similar products if you have already purchased from us and have not opted out of
 receiving such information.

4. OUR LEGAL BASIS FOR PROCESSING DATA

All of our use of personal data is in accordance with the law. The law requires us to only process data where we have a valid legal basis for doing so. Most commonly, we will use your personal data in the following circumstances:

- Where we need to perform the contract we are about to enter into or have entered into with you, such as providing you with the service you have requested, (for example adoption updates or membership magazines, and to contact you about these in order to administer your request).
- Where it is necessary for our **legitimate interests** and your interests and fundamental rights do not override those interests (as set out below).
- Where we need to comply with a legal or regulatory obligation, (for example processing and retaining Gift Aid declarations, reporting to Companies House, and other regulatory bodies to satisfy our legal, regulatory and compliance obligations).
- Generally we do not rely on consent as a legal basis for processing your personal data other than in relation to sending email or text message (and in some instances by phone) direct marketing communications about fundraising, campaigns and events (as detailed in section 5.b). We may also provide you information on similar products you may purchase from our online shop, if you have previously purchased from us, and have not opted out of receiving such information. You have the right to withdraw your consent to marketing at any time by contacting us or clicking the unsubscribe link in the email communication we send you.

WWF-UK's legitimate interests include administering the charity, sending you marketing materials by phone and post, and understanding our supporters. A summary of each of these and some examples of how we may use your data in these ways on the basis of it being within our legitimate interests to do so are set out below:

- 1) Administration of the charity. As a charity our mission is to conserve the natural world for future where people and nature thrive. In order to deliver against these charitable purposes, we need to undertake certain processing activities. Some of these will be to govern our charity and its trading subsidiary, and some will be for operational administration reasons. Specific examples of processing activities under this legitimate interest include:
 - Recording your communication and marketing preferences and maintaining suppression files so we don't contact you when you have asked us not to
 - Keeping a record of who our supporters are, your relationship with us, and your order and donation history
 - Reviewing our database of supporters across the organisation for historical, scientific and statistical purposes
 - Operational administration such as:
 - Recruiting and processing job applications
 - Keeping employee records and monitoring
 - Health and Safety
 - Management and planning purposes
 - Thanking you for your support
 - Keeping you up to date with the work you are supporting and the latest conservation

news

- Administering your donation by sending your bank details to our bank
- Financial management and controls such as:
 - Processing supplier invoices
 - Administering grants to overseas offices for our programmatic work on the ground such as protecting the Javan Rhinos
 - Taking steps to prevent fraud, knowing our donors, and taking steps to ensure there
 is no misuse of services or money laundering
 - Enforcing legal claims including debt collection and out of court expenses
 - Administering estates and gifts in Wills where WWF-UK is named as beneficiary or executor
- 2) To contact you by post and phone. Contact with our supporters is vital to the way we operate when you join WWF, you are joining a worldwide movement and showing your support for environmental issues. We want to keep in touch with you and, along with telling you how your support is helping and what we have achieved together, we also want to keep you up to date with the numerous activities you can get involved with. We believe it is in our legitimate interest to send you such materials by post and to speak to you by phone, unless you have told us you prefer us not to. In order to achieve our mission we need people like you to support us, and to gather your support we need to be able to contact you.

Specific examples of processing activities under this legitimate interest include:

- sending marketing materials as detailed below, including:
 - Asking for financial and non-financial support
 - Inviting you to take part in campaigns and support our advocacy work
 - o Inviting you to events by post and phone
 - Sending you details of products you can buy from our online shop by post
 - Providing you information on similar products you may purchase from our online shop, if you have previously purchased from us, and have not opted out of receiving such information
- 3) Understanding our supporters. It is important that we understand our supporters. If we don't understand you, then we cannot communicate with you in a meaningful way, and in a way which will be engaging and interesting. If we understand you, then we are better able to direct communications to you which you will be interested in. This helps us safeguard your donations and ensure value for money across our communication activities. In order to understand our supporters better, we undertake a number of processing activities including analysis, research, profiling and customising your experience as detailed in this policy. Specific examples of processing activities under this legitimate interest include:
 - Analysing our database and seeing what has worked and what hasn't. This helps us develop
 our products and services, and helps inform our marketing strategy so we only send you
 information that we think will be of interest to you, and so that we understand the
 effectiveness of the marketing we serve you.
 - Researching your interests we want to utilise your donations in the most cost-effective way, and so we don't send blanket messages to the entirety of our database. Rather, we deliver content we think will be relevant to you and personalised when appropriate.
 - In limited circumstances, analysing the personal information we collect about you and using

- publicly available information to better understand your interests, preferences and level of potential donations so that we can contact you more effectively.
- Customising your experience and displaying more relevant information (including adverts) to you.

If you would like more information on our uses of legitimate interests or to change our use of your personal data in this manner, please contact us.

5. WHAT WE COMMUNICATE WITH YOU ABOUT

5.a. WHAT YOU'VE REQUESTED

We communicate with you about what you have asked us to – to provide the service you have requested. For example, if you have signed up to a campaign, we will keep you in touch with our campaigns. If you have adopted an animal, we will update you on your chosen species.

We will keep you up to date with the latest conservation news and updates. If you have joined WWF as a member then you will periodically receive updates on our latest work, including Action, our membership magazine.

5.b. MARKETING

In addition to conservation news and updates on our work, we may also contact you about three other things (note: these detail examples of the types of communications we may send, and are not exhaustive):

- fundraising: your support is vital to our work and without you we would not be able to continue our conservation efforts. We may ask you to make a donation, contribute to an appeal, upgrade your support or change its type. We may also as you to renew or restart your support. We'd also love to show you what you can buy on our online shop where all our products are eco-friendly and inspired by our natural world, and 100% of profits are gift aided back to the charity to support our conservation work.
- campaigning: we'd love to tell you about our campaigning activities and advocacy work so that you can get involved. This could be telling you about activities such as how to make greener lifestyle choices, writing to your elected representative (for example MP, MSP or AM), signing a petition, contacting businesses or sharing campaign communications to influence for positive change for the environment.
- events: we run a host of events, from our annual Living Planet Lecture to specialist speakers and special supporter events which we may like to invite you to. We'd also love to tell you about our Team Panda challenge events such as Ride London or the Brighton Marathon which we'd love you to get involved with. We'd also like to tell you about community fundraising opportunities where we can support you with your own events, or days where you can join a movement like Earth Hour and Wear It Wild.

The law distinguishes between the channels you choose to receive this information, and so we give

you different options when we ask to use your data in this way.

We will always ask for your consent if we want to contact you by email or text message, however we do not normally ask for consent to make telephone calls to you or write to you about any of these three things (provided you haven't specifically told us you don't want to receive them or if your telephone number is registered on the Telephone Preference Service). This is because, as a charity, each of these activities is fundamental to how we work, so we have a legitimate interest to contact you, as described in section 4 above.

When you give us your details we will tell you what we are going to do with them. You will always be given the opportunity to opt-out of receiving these materials by phone and post if you prefer not to. You can unsubscribe at any time - see HOW TO CHANGE THE WAY WE CONTACT YOU for further information.

While we don't usually ask, there are some instances where we may have expressly asked you for consent to receive telephone calls or letters from us (for example, if you gave us your details through our fundraisers in person). If you have consented for us to contact you in these ways, we will continue to do so unless you tell us not to.

In addition, where you have visited our online shop and provided us your details, then we may send you information about similar products which we think will be of interest to you, where you have not opted out of receiving such information. We will also always provide an opportunity for you to optout in every communication we send you about these products.

6. MARKETING PREFERENCES

We make it easy for you to tell us how you want us to communicate with you. Our communications have clear marketing preference questions and we include information on how to opt out when we send you marketing or fundraising materials, which in the case of emails, is by means of an unsubscribe link.

You can change your marketing preferences at any time by contacting us – see HOW TO CHANGE THE WAY WE CONTACT YOU or by completing this form.

Where you have previously provided us with your telephone number, please note that we may use that telephone number to call you (provided you are not registered with the Telephone Preference Service - TPS). You can of course change your preferences at any time if you wish to as detailed above.

Please note that changing your marketing preferences will not affect the communications we send you where it constitutes the service you have requested – for example, if you have signed up to join us as a member then you tell us you do not wish to receive information on our fundraising, campaigns and events, you will still receive your membership updates.

7. WHO WE SHARE YOUR DATA WITH

7.a. THIRD PARTIES FOR THEIR MARKETING

We do not sell or share personal details with third parties so that they can market to you.

7.b. SERVICE PROVIDERS / SUPPLIERS

As with other organisations, we do not undertake all of our processing activities ourselves and we appoint suppliers to help us out. For example, if you opt to receive a cuddly toy with your adoption then we have an appointed agency will send the toy to you on our behalf. In order to do this we need to share your personal data with them so they know where to send it. Similarly, we don't print all our letters in our office, nor do we print all of our design-work and community fundraising packs in-house.

In these cases and others, we ensure that we have a contract with the supplier and as part of that agreement the supplier agrees to respect the security of your personal data and to treat it in accordance with the law. We only permit suppliers to process your personal data for specified purposes and in accordance with our instructions.

The main classes of recipients we may disclose your data to and the reasons we do so are listed below:

Process / Activity	Class of recipient	Location of recipient	Reason
Adoptions	Fulfilment House	UK	To send you your adoption pack, cuddly toy and adoption updates.
			To send you a thank you letter to thank you for your adoption or donation.
Membership	Fulfilment House	UK	To send you your membership pack.
Community Fundraising Pack	Printer	UK	To print and produce your fundraising pack to help you undertake your own events in aid of WWF.
Financial Actions	Banks	UK	To process your direct debits and other donations.
	HMRC		To process your Gift Aid.
Fundraising Appeals	Mailing House	UK	To send out fundraising appeals to ask you to support our work.

If you would like further information on our third-party processors please contact us.

7.c. INTERNATIONAL TRANSFERS

We may need to transfer your personal data to suppliers based in the US or other countries outside of the European Economic Area (EEA) to allow them to perform services on our behalf (such as when you sign up for a petition to help safeguard the natural environment). In doing so, your data may be stored or otherwise processed outside of the EEA.

In most cases, we do not transfer your personal data outside of the European Economic Area (EEA). However, as we are part of a global network, there are some instances in which we may share your data within our Network. These instances are limited and are mainly where one of our Network offices wants to refer a contact to another office who would be better placed to contact the individual or manage the relationship, for example, where they live or work in that country.

Whenever we transfer your personal data out of the EEA, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards are in place:

- the country has been deemed to provide an adequate level of protection for personal data by the European Commission;
- a specific contract which is approved by the European Commission and gives personal data the same protection it has in EEA, has been entered into with the supplier; or
- Where we use service providers based in the USA, it is accredited under the EU-US Privacy Shield which requires them to provide similar protection to personal data shared between Europe and the USA.

7.d. SOCIAL MEDIA

Depending on your settings and the privacy policies for social media and messaging services like Facebook and Twitter, you might give us permission to access information from those accounts or services. For example, we occasionally participate in Facebook's "Custom Audience" program which enables us to display adverts to our existing or potential supporters via Facebook. We provide personal information such as your email address to Facebook to enable them to determine if you are a registered account holder with Facebook. Our adverts may then appear when you access Facebook and on your Facebook feed. Your data is sent in an encrypted format that is deleted by Facebook if it does not match with a Facebook account. For more information please read the Facebook Business page about Custom Audiences and Facebook's Data Policy.

7.e. WHERE REQUIRED

In other cases we will not disclose any of your personal data except in accordance with this policy, or when we have your permission, or under special circumstances, such as when we believe in good faith that the law requires it or to protect the rights, property and safety of WWF, or others. This includes disclosing your details if required to the police, regulatory bodies or legal advisors.

8. HOW WE KEEP YOUR DATA SAFE

We have appropriate physical, technical and managerial controls in place to protect your personal details; for example our online forms are always encrypted and our network is protected and

routinely monitored. Within our offices only those who have a business need to access your information and who are trained in handling data securely will have access to your information. We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. Whilst we hope it will never happen, we have procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are required to do so.

When we use external companies to collect or process personal data on our behalf we undertake due diligence on these companies before we work with them, and put a contract in place that sets out our expectations and requirements, including keeping and using your data securely.

Our website may, from time to time, contain links to third party websites. If you follow a link to any of these websites, please note that these websites will have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to these websites.

Despite all of our precautions however, no data transmission over the internet can be guaranteed to be 100% secure. So, whilst we strive to protect your personal information, we cannot guarantee the security of any information which you disclose to us and so wish to draw your attention that you do so at your own risk.

Where we have given you (or you have chosen) a password which enables you to access certain parts of our site, you are responsible for keeping this password confidential, and we ask you not to share this with anyone.

9. KEEPING YOUR INFORMATION UP TO DATE

We really appreciate it if you let us know if your contact details, or circumstances change. You can also update your details online at any time via our change contact page: https://www.wwf.org.uk/change-contact

Where possible we use publicly available sources to keep your records up to date; for example, the Royal Mail's National Change of Address database – see HOW WE COLLECT INFORMATION ABOUT YOU.

10. HOW LONG WE KEEP YOUR DATA FOR

We will only keep your personal information for as long as is necessary for the purpose for which it is collected, which may include the purpose of satisfying any legal, accounting or reporting requirements. If you request that we stop sending you marketing materials we will keep a record of your contact details and the appropriate information to enable us to comply with your request not to be contacted by us.

10.a. RETENTION OF YOUR DATA

In order to determine how long we keep your data we look at the category of data and the reason we collected and have processed it. We look at whether that reason is ongoing and whether you are an active supporter or not. We consider you to be an active supporter if you have opened our mailings and have interacted with us in some way such as if you have corresponded with us, signed up for a petition and/or financially supported us any time within the preceding two years.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve these purposes through other means, and the applicable legal requirements.

Supporter Data

If at any time you cease to become an active supporter then we continue to send you communications for a limited period of time (no more than 3 years for email and SMS (text) communications, and 5 years for post and phone call). We will keep your details for a further period of time for Gift Aid and other legitimate purposes such as legal and regulatory reasons (for example, for Gift Aided donations, the HMRC requirement that we keep financial information for 7 years after your last donation to us). We will keep some data indefinitely (for example your name, address and donation history) as a large proportion of our legacy income comes from people we weren't aware would leave us a gift in their Will, and knowing that you were a supporter in the past is important for us to know in case your Will is contested. This can be decades after the last interaction with WWF. In these cases, we will only retain data which is necessary for these purposes and will delete or anonymise other parts of your record.

Other data

As detailed above, we may hold personal data about individuals who interact with us in other ways (see WHAT INFORMATION WE COLLECT). We have a data retention policy which addresses each type of information we hold. Please get in contact if you would like to find out more about how long data is kept in these circumstances.

10.b. WHAT HAPPENS WHEN WE ANONYMISE OR DELETE YOUR DATA

When we anonymise or delete your data, we will ensure that it is no longer identifiable to you. We may keep anonymised data for future analysis on aggregated data so that we can understand our supporters better. This may be for research or statistical purposes, or for any other purpose, and we may use this information indefinitely without further notice to you.

11. HOW TO FIND OUT WHAT INFORMATION WE HAVE ABOUT YOU

You can request the details of the personal information we hold about you. If you want to access your information, please contact us and send a description of the information you want to see and proof of your identity. We may then need to ask you for further information in order to service your request, such as confirmation of your identity, or whether there is any specific data you would like or from a specific time period. We may send you a form in order to assist you in this.

We will respond to you within one month of your legitimate request. You will not have to pay a fee to access your personal data however we reserve the right to charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively we may refuse to comply with your request in these circumstances.

If you just need to update your contact details you can also do so online by filling in this form.

12. HOW TO CHANGE THE WAY WE CONTACT YOU

You can ask us to stop sending you marketing messages at any time by completing this form to adjust your marketing preferences, by contacting us, or by following the opt-out links on any marketing message sent to you.

Where you opt out of receiving marketing messages from us, please note that you will still continue to receive items to perform the service you have asked of us – i.e. you will still receive your Action Magazine if you are a member, you will just not receive other information about fundraising, events and campaigns. You can opt back in at any time by contacting us.

If at any time you'd like us to change how we contact you (via email, SMS, phone or post), please fill in this form or call Supporter Care on **01483 426333**.

You can also now register your details with the Fundraising Preference Service if you want to tell us through the Fundraising Regulator that you would prefer us not to contact you with information on our fundraising, campaigns and events. If you want to stop marketing via telephone then you can also register with the Telephone Preference Service ("TPS").

We will only email or text you if we believe you have consented for us to do so. In every email or text we send there will be instructions on how to unsubscribe. During any phone conversation you have with us please feel free to let us know how you prefer to be contacted.

Due to the timing of our mailings, there may be a delay of up to 6 weeks before your instruction is actioned and during this time you may still receive mailings from us. There is no need to contact us again. If you are still hearing from us 6 weeks after you have asked us not to contact you then please contact our Supporter Care team.

Please note that if you request that we stop sending you marketing materials we will keep a record of your contact details and the appropriate information to enable us to comply with your request not to be contacted by us. See HOW LONG WE KEEP YOUR DATA FOR.

13. WHAT TO DO IF YOU DON'T WANT US TO PROCESS INFORMATION ABOUT YOU

If you don't want us to collect information about you as you browse our website you'll need to set your browser to notify you when you receive a cookie, then choose to decline it.

If you don't want us to hold any personal details about you, it's best just not to give them to us. If you

want us to stop collecting information about you or processing that information then please let us know by contacting us.

13.a. WHAT TO DO IF YOU OBJECT TO OUR PROCESSING

If you object to any of the processing described in this privacy policy then you have the right to object to that processing in certain cases. Unfortunately this means that we may not be able to process your data any longer or provide you with certain information or services.

We will need to keep a copy of your name, postcode and email address so that we can identify you on our suppression list to ensure we do not contact you any further or process your data in the way that you have objected to.

14. YOUR RIGHTS

Under data protection laws you have various rights over your personal data. If you would like to exercise any of these rights then please contact us.

You have the right to:

ACCESS YOUR PERSONAL DATA

You have the right to request access to your personal data, commonly known as a 'subject access request'. This enables you to receive a copy of the personal data we hold about you.

See: HOW TO FIND OUT WHAT INFORMATION WE HAVE ABOUT YOU.

REQUEST CORRECTION OF YOUR PERSONAL DATA

You can request that we correct the personal data we hold about you. This enables you to have an incomplete or inaccurate data we hold about you corrected, although note that we may need to verify the accuracy of the new data you provide to us.

REQUEST DELETION OF YOUR PERSONAL DATA

You have the right to ask us to erase your personal data in certain circumstances. Please note however that there may be circumstances where you ask us to erase your personal data but we are legally required or entitled to retain it.

OBJECT TO PROCESSING OF YOUR PERSONAL DATA OR REQUEST RESTRICTION

Where we are processing your data under the legitimate interest condition, then you may object to this processing, or request that the processing is restricted, if there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. Note that there may be circumstances where you object to, or ask us to restrict, our processing of your personal data but we are legally required or entitled to continue to processing your personal data and/or to refuse your request.

In some cases, we may demonstrate that we have a compelling legitimate ground to process your information which override your rights and freedoms.

REQUEST TRANSFER OF YOUR PERSONAL DATA

In certain circumstances you are able to request a transfer of your data from one service provided to another, such as from one service provider to a competitor.

WITHDRAW CONSENT

Where we have asked you for consent to process your data, you may withdraw this consent at any time by contacting us - see: HOW TO CHANGE THE WAY WE CONTACT YOU and MARKETING PREFERENCES. Please note however that we may still be entitled to process your personal data if we have another legitimate reason (other than consent) for doing so.

15. CHANGES TO THIS POLICY

This policy was last updated in November 2020. It was re-worded to give you further information about how we collect, use and store your personal data, and to reflect the changes in law as set out in the General Data Protection Regulation and to give you more clarity on how we use your data, and your rights in relation to it.

We may amend or update this policy at any time to take account of any changes to data protection law or other legislation. When further updates to the policy are made they will be posted on this page, so please check back here regularly. Any significant changes will be notified to you.

16. FURTHER INFORMATION

THE LAW

The laws that dictate how your personal information can be used are:

- The Data Protection Act 1998 from time to time in force
- The Privacy and Electronic Communications Regulations 2003
- The EU General Data Protection Regulation

COMPLAINTS

We are committed to working with you to obtain a fair resolution of any complaint or concern about privacy.

For full details of our complaints procedure and how to make a complaint, please visit: https://www.wwf.org.uk/contact-us/complaints

If you have a complaint then please contact us in the first instance and we hope to be able to resolve your complaint. If however, you believe that we have not been able to assist with your complaint or concern then you have the right to make a complaint to the data protection authority in the UK, which is the Information Commissioner.

You can contact the Information Commissioner's Office at ico.org.uk to find out more or report a concern. They are the UK's independent authority set up to uphold information rights in the public interest, promoting openness by public bodies and data privacy for individuals. We work with them to make sure that we collect, store and use your information appropriately and don't

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do anything you wouldn't expect us to.

As a member of the Fundraising Regulator, we abide by the Code of Fundraising Practice. This is a code of best practice which governs how our fundraising must take place. We take the requirements very seriously. The Code has sections on personal data which sit alongside the laws as named above and we strive to comply with best practice as well as law. If you have any concerns about how your data is used in fundraising, then please do contact us in the first instance or if your query is not resolved, you may contact the Fundraising Regulator.

17. CONTACT US

If you have any questions please contact our Supporter Care team using the details below:

Phone: 01483 426333

Online: www.wwf.org.uk/contact-us

Post: The Living Planet Centre, Brewery Road, Woking, Surrey, GU21 4LL