



# Privacy Policy

## 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 information we request when you engage with us and how we will use it.

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, handled responsibly and in line with the law. The data protection laws that apply and govern how your personal data can be used are:

- The UK General Data Protection Regulation (UK GDPR)
- The Data Protection Act 2018
- The Privacy and Electronic Communications Regulations 2003

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. This policy was last updated in May 2023.

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

<b>Section</b>	<b>Contents</b>	<b>Page</b>
<b>1</b>	<b>Who we are</b>	<b>3</b>
<b>2</b>	<b>Why we collect personal data</b>	<b>3</b>
<b>3</b>	<b>When do we collect personal data?</b>	<b>4</b>
<b>4</b>	<b>What personal data do we collect?</b>	<b>4</b>
<b>5</b>	<b>How we collect personal data about you</b>	<b>5</b>
<b>6</b>	<b>What we use your personal data for</b>	<b>7</b>
<b>7</b>	<b>Our legal basis for processing personal data</b>	<b>8</b>
<b>8</b>	<b>Our conditions for processing special category data</b>	<b>10</b>
<b>9</b>	<b>What we communicate with you about</b>	<b>11</b>
<b>10</b>	<b>Marketing and contact preferences</b>	<b>11</b>
<b>11</b>	<b>Who we share your data with</b>	<b>12</b>
<b>12</b>	<b>International transfers</b>	<b>14</b>
<b>13</b>	<b>How we keep your data safe</b>	<b>14</b>
<b>14</b>	<b>How long we keep your data for</b>	<b>15</b>
<b>15</b>	<b>Your individual rights</b>	<b>16</b>
<b>16</b>	<b>How to raise a complaint</b>	<b>17</b>
<b>17</b>	<b>Contact us</b>	<b>18</b>

## **1. Who we are**

WWF-UK is part of the WWF global network which operates in over 100 countries around the world. All national offices work collaboratively with a common mission of creating a world where people and nature can thrive together. 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 and are registered with the UK privacy regulator, the Information Commissioner's Office (ICO), under reference numbers Z6158630 and Z6159804.

## **2. Why we collect personal data**

### **To create a world where people and nature can thrive**

In order to build a future where people live in harmony with nature, we need to have effective communications and fundraising activities. 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, 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 inspire future generations to help bring our world back to life**

At WWF-UK, our mission is for everyone. We want to support and inspire young people to learn, take action, and use their voice, to help bring our world back to life. Collecting young people's personal data allows us to make sure our communications are age appropriate and tailored to young people's needs and wants. For more information about how we use young people's data and why it's important for young people to know this please see our Young Person's Privacy Policy.

### **To put more money in to conservation**

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 our conservation work.

### **3. When do we collect personal data?**

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

- Become a member of WWF-UK, adopt an animal or set up a regular gift
- Fundraise for us, volunteer with us, participate in an event or visit our UK headquarters – 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
- Sign up to take part in the WWF Weekly Lottery
- Download the WWF My Footprint app or use our digital tools such as the Footprint Calculator
- 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 to influence business, government and the wider public
- 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
- Apply to become a WWF Youth Ambassador or a member of the Sustainable Futures Youth Advisory Group
- Join WWF-UK's online supporter research community 'The Pod'
- Take part in research for WWF-UK for example by taking part in one of our supporter surveys or an interview
- Contact us or become involved with us in any other way than as stated above.

### **4. What personal data do we collect?**

The information we 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 will collect your date of birth in order to ensure that we communicate with you in an age appropriate way and do not send marketing communications to anybody under the age of 13. There are also some services that we are not able to provide to under 18s, so it is important that we know how old you are
- Financial and credit card information which you give to us when making a purchase, including your gift aid status (note that we do not store credit or debit card information)
- Record of your donation history, correspondence and campaign actions taken with us
- Images, photographs or videos if you take part in an event, volunteer with us or take part in a research project via 'The Pod'
- 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 from publicly available sources about your work or interests

- Imagery from an external CCTV system if you attend our headquarters, The Living Planet Centre
- Any other details you provide us including your reasons for supporting us.
- Information you enter onto our website, including information you provide in order to take part in challenge events such as the London Marathon. When you enter a challenge event you will be asked by the organisers to complete the official event registration platform which may require providing relevant health information and next of kin details, for the purposes of ensuring your health and wellbeing. Where WWF-UK is not the primary event organiser, we will not have access to this information.

If you're adopting an animal or buying a membership as a gift for someone else, we'll also need their name and address to send their welcome pack and adoption updates to. We won't contact them about anything else unless they ask us to and provided they are at least 13 years old and therefore old enough to provide their consent to the processing of their personal information.

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

- If you apply for a job with us. As part of our commitment to being a more diverse and inclusive organisation and to ensure that we treat people fairly, we may collect information about your ethnicity, religious or philosophical beliefs, political opinions, sexuality or data concerning health and disabilities. This information will only be used for monitoring the diversity of our applicants and to ensure that our processes are being fairly applied. 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 separate privacy information when this type of information is requested so you are aware of how your data will be collected, used and stored.
- If you attend an event or challenge, or join an excursion that we are organising, we may ask you to let us know of any relevant health conditions, disabilities or allergies that you may have, in order for us to better plan the activities and safeguard your wellbeing by making any necessary adjustments.
- If you have been specifically asked to participate in market research or a survey which include questions on the sexuality, ethnic and religious diversity of our supporters. 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.

## **5. How we collect personal data 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. This may be via our website, over the phone or face to face through interactions with one of our fundraising partners.

### **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, click a link or 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 our conservation work. If you don't wish to allow 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 Link™). 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 help us keep our records accurate and up to date, to manage supporter relationships and so that we can be sensitive to the family members of a supporter who has passed away.

An external agency manages 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.

### **Postcode Analysis**

We use Mosaic, a consumer categorisation system which places UK postcodes into broad groups and sub-groups that are likely to share similar characteristics. These groups help us understand the likely demographics, lifestyles and behaviours of the people living in these postcodes.

We do not get individual information from this system – we only get aggregated and anonymous data and information on the groups and sub-groups. This 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 platforms such as, but not limited to, Facebook, Instagram, Twitter, TikTok, Pinterest or LinkedIn, depending on

your settings or the privacy policies of these social media services. To change 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 process it 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, whereby 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 and Online Research**

In a limited number of cases, we may use desktop and online research, profiling and screening techniques to analyse your personal information to create a profile of your interests and preferences. We do this so that we can contact you with information relevant to you, to be prepared for when we meet you, or to help us find others like you who might like to show their support. We may also make use of additional information about you, including geo-demographic information and measures of affluence. This 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 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. It also 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 could.

## **6. What we use your personal data for**

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

- Providing you with the goods or services you have requested
- Asking for financial and non-financial support
- Administering your donation, including processing Gift Aid claims
- Keeping a record of your relationship with us
- Keeping you up to date with the work you are supporting and the latest conservation news
- Managing your communication preferences, including marketing preferences
- Sending you tailored communications and displaying relevant adverts which we think will be of interest to you
- Sending you marketing materials which may include information about fundraising, campaigning and events

- Inviting you to events or excursions and to take part in campaigns and support our advocacy work
- Understanding how we can improve our services, products or information
- 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.

## **7. Our legal basis for processing personal data**

All of our use of personal data is in accordance with the law. The UK GDPR 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 processing your donation and 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 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).
- We rely on your **consent** in order to send you direct marketing communications via email or text message (and in some limited instances by phone). You have the right to withdraw your consent to marketing at any time by contacting us or clicking the unsubscribe link in the communication we send you or telling us over the phone.
- Where it is necessary for our **legitimate interests** and your interests and fundamental rights do not override those interests.

WWF-UK's legitimate interests include (but are not limited to) 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:

### **Administration of the charity**

As a charity our mission is to conserve the natural world for a 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
  - Operating a CCTV system at our head office
  - 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 WWF offices for our programmatic work on the ground
  - Taking steps to prevent fraud, knowing our donors, and taking steps to ensure there is no misuse of services or money laundering
  - Undertaking due diligence on service providers and partner organisations
  - 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

### **To contact you by post and phone**

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. 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.

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
  - 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

### **Understanding our supporters**

It is important that we understand our supporters so that we can communicate with you about things that are meaningful and interesting to you. This also 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.
- Where we don't have a date of birth or age data for you, we may use other information you have provided us and your donation/interaction history to make assumptions about your approximate age. This helps us communicate with you in an age appropriate way and provide you with more tailored information.

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.

## **8. Our conditions for processing special category data**

The UK GDPR requires that WWF-UK only uses sensitive information about those individuals we interact with, under certain and limited conditions. These conditions include:

- Where we have your **explicit consent** to process sensitive information such as health conditions relevant to an event or excursion that you are attending with us. Or if you agree to take part in any research or surveys which seek to understand the ethnic or religious diversity of our supporter base.
- If you apply for a job with us, any information you provide as part of your application which is special category data, such as health, religious or ethnicity information is necessary for **employment, social security and social protection** law (such as the Equality Act 2010) purposes. This is so that we can monitor the diversity of our applicants, safeguard your fundamental rights and ensure our equal opportunity processes are being fairly applied. Our obligations in these circumstances extend to every stage of employment, including the pre-employment phase.

Where necessary, WWF-UK also processes criminal offence data which we receive either directly from you or when it forms part of a DBS check undertaken prior to offering an employment or volunteering position. In these instances this data will be processed under the following conditions of the Data Protection Act 2018:

- For WWF-UK employees and prospective employees:
  - Schedule 1, Part 1, Paragraph 1 - **Employment, social security and social protection**
- For WWF-UK volunteers and relevant third parties:
  - Schedule 1, Part 3, Paragraph 29 – **Consent**

## **9. What we communicate with you about**

### **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 communicate the latest conservation news and updates to you. If you have joined WWF as a member then you will periodically receive updates on our latest work, including Action, our membership magazine.

### **Marketing**

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

- **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 ask 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 MS), signing a petition, contacting businesses or sharing campaign communications to influence for positive change for the environment.
- **Events:** we run a host of supporter events and excursions, 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.

## **10. Marketing and contact preferences**

The law distinguishes between the channels you choose to receive marketing and promotional materials from us, 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, and you are able to withdraw your consent and unsubscribe at any time.

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 too. For example, if you gave us your details through our fundraisers in person.

However, in most cases we rely on having a legitimate interest to make telephone calls to you or write to you (unless you have specifically told us you don't want to receive them or if you

telephone number is registered on the Telephone Preference Service) because each of these activities is fundamental to how we work as a charity.

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 opt-out in every communication we send you about these products.

You can change these preferences or ask us to stop sending you marketing messages at any time by either completing [this form](#), contacting our Supporter Care team on 01483 426 333, or by following the opt-out links on any marketing email or text sent to you.

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”).

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. However, 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 name, postcode and email address so that we can identify you on our suppression list to ensure that we do not contact you again in future.

Changing your marketing preferences will not affect the communications we send you where it constitutes the service you have requested – for example, 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.

## **11. Who we share your data with**

### **Service providers / suppliers**

As with other organisations, we do not undertake all of our business activities ourselves and we often appoint specialist suppliers to help us.

If these activities involve the processing of your personal data, we ensure that we have a contract in place with the supplier (or data processor) and as part of that agreement the supplier agrees to respect the confidentiality and security of your information 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 categories of recipients we may disclose your data to and the reasons we do so are listed below:

<b>Process / Activity</b>	<b>Class of recipient</b>	<b>Location of recipient</b>	<b>Reason</b>
Adoptions	Fulfilment House	UK	To send you your adoption pack, cuddly toy and adoption updates.

			To send you a 'thank you' letter as appreciation 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.
WWF Lottery	Lottery Provider	UK	To enter you into the WWF Weekly Lottery.
Telemarketing	Telemarketing Agencies	UK	To contact you about your existing donations and let you know about other ways in which you can support our work.
Online Advertising	Social Media Platforms	UK and EEA	To show you information about our conservation work, campaigns and events when you are online and using social media.

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

### **Our conservation partners**

Our campaigning and conservation work often involves WWF-UK collaborating with and working alongside other like-minded charities and specialist conservation groups. On occasions we may offer you the opportunity to opt-in to hear from these partners directly. In order to facilitate this, we will need to share your personal data with them, but only ever when you have provided your specific consent for us to do so.

### **Our WWF network offices**

As WWF-UK are part of a global network, there are also 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. If this referral involves transferring your data overseas we will seek your explicit consent before doing so.

### **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 them. Our adverts may then appear 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.

### **Where required**

We will not otherwise disclose 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-UK, or others. This includes disclosing your details if required to the police, regulatory bodies or legal advisors.

We will never sell your personal data to a third party so that they can market to you.

## **12. International transfers**

In most cases, we do not transfer your personal data outside of the UK or European Economic Area (EEA). However, on occasions we may use a service provider or supplier who is located in another country, such as the USA. To allow them to perform services on our behalf (such as when you sign up for a petition to help safeguard the natural world) it may be necessary for those suppliers to store or otherwise process your personal data outside of the EEA.

Whenever we transfer your personal data out of the UK or 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 other country has been deemed to provide an adequate level of protection for personal data by the European Commission or UK Government;
- Where we have entered into a formal contract with the receiver, which incorporates standard data protection clauses recognised or issued in accordance with UK data protection law and approved by the ICO. Standard data protection clauses impose contractual obligations on the sender and the receiver, and grant rights to people whose personal data is transferred. These contracts take the form of the:
  - International Data Transfer Agreement (IDTA); and
  - International Data Transfer Addendum (Addendum) – which is an addendum to the new standard contractual clauses issued by the European Commission (new EU SCCs).

## **13. How we keep your data safe**

WWF-UK maintain appropriate technical and organisational controls to protect your personal data. For example, our online forms are always encrypted, 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 personal 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. Where we

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

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.

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 to this so that you do so at your own risk.

When we use third parties to collect or process personal data on our behalf we undertake due diligence on these companies before we work with them to ensure that they handle your data confidentially and 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.

## **14. 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.

### **Retention of Supporter Data**

In order to determine how long we keep your data we look at the category of data and the reason we have collected and 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 emails or 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 at any time within the preceding two years.

If at any time you cease to become an active supporter then we will continue to send you communications for a limited period of time (no more than 3 years for email and 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).

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.

If you contact us by phone we often record calls for training and monitoring purposes and these recordings are kept for one month before being securely deleted.

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-UK. 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. 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.

## **15. Your individual rights**

Under data protection law, as an individual you have various rights over your personal data and how it is processed by WWF-UK. These rights include your right to:

### **Be informed about the collection and use of your personal data**

In order to ensure that we process your personal data lawfully, fairly and in a transparent way, we will let you know the purposes for processing your data at the time when we collect it from you. We do this with the use of privacy statements, 'just in time notices' and by providing links to this Privacy Policy. In the event that we collect your personal data from other sources, we will provide you with privacy information as soon as possible or within one month of obtaining it.

### **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. The information will be supplied to you in a commonly used electronic format unless you tell us otherwise.

### **Request rectification of your personal data**

You can request that we correct, update or complete any inaccurate personal data we hold about you. In most circumstances you are able to do this yourself via the [I'd like to change personal details page of our website](#). Please note that in certain circumstances we may need to verify the accuracy of the new data you provide to us.

### **Request the erasure of your personal data**

In certain circumstances you have the right to ask us to erase your personal data. Please note however that there may be circumstances where we are unable to complete your request as we are legally required or entitled to retain it. In such circumstances we will ensure that we minimise the amount of information that we keep and explain to you what this is and why we need to continue processing it.

### **Restrict the processing of your personal data**

Where you don't want us to delete your data permanently but wish for us to stop using it for a certain period of time, you also have right to restrict the processing. This can be requested in circumstances where you have concerns over the accuracy of the information we hold or how we are using it.

### **Object to the processing of your personal data**



If you feel that our processing of your data under the legitimate interest condition impacts your fundamental rights and freedoms then you have the right to object to this processing. For instance, you have the right to object to WWF-UK using your personal information for direct marketing purposes. However, there may be other circumstances where we are able to demonstrate a compelling legitimate reason to continue to process your information. Where that reason overrides your rights and freedoms we may refuse your objection.

### **Request transfer of your personal data**

In certain circumstances you are able to request a transfer of your data from one service provider 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 that consent at any time by contacting us on the details below.

If you would like to exercise any of these rights then you can do so, free of charge, by contacting our Supporter Care team via the details below. Depending on the circumstances we may need to ask you for further information in order to confirm your identity, or to confirm the specific details of your request. We may send you a form in order to assist you with this, although you do not have to complete it if you'd prefer not to.

We will respond to your request as soon as possible or at the latest within one month. 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.

## **16. How to raise a complaint**

We are committed to working with you to obtain a fair resolution to any complaint or concern regarding your privacy or our use of your personal information.

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 it to your satisfaction. However, if you believe that we have not been able to assist with your complaint or concern then you can also complain to the UK's privacy regulator, the Information Commissioner's Office (ICO). Their details are as follows:

The ICO, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF

Helpline number: 0303 123 1113

Online: <https://www.ico.org.uk>

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 data protection laws mentioned in this policy 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](http://www.wwf.org.uk/contact-us)

Post: WWF-UK, The Living Planet Centre, Rufford House, Brewery Road, Woking, Surrey, GU21 4LL