



# Privacy policy for the Goose & Swan Monitoring Programme

This privacy policy sets out how the Wildfowl & Wetlands Trust (WWT) processes personal data we collect from you or are provided by you for the purposes of the Goose & Swan Monitoring Programme (GSMP) (for further details about the GSMP please go to <https://monitoring.wwt.org.uk/our-work/goose-swan-monitoring-programme/>).

WWT is committed to protecting the personal information of all GSMP participants, supporters and associates.

## Who we are

The Goose and Swan Monitoring Programme (GSMP) is run by WWT in partnership with the Joint Nature Conservation Committee (JNCC), and Scottish Natural Heritage (SNH).

- WWT Limited is a charity (1030884 in England and Wales, SCO39410 in Scotland and a company limited by guarantee (2882729 England).
- JNCC is the public body that advises the UK Government and devolved administrations on UK-wide and international nature conservation.
- SNH is the public body that advises the Scottish Government and local authorities on all matters relating to Scotland's natural heritage.

WWT is the Data Controller for all processing of personal data for the purposes of the GSMP. This Privacy Policy relates to personal information allowing an individual to be identified directly or indirectly that is obtained by WWT and for which WWT is the Data Controller.

## Why we hold and process your personal information

- To administer and run the GSMP.
- To provide you with feedback and information about the GSMP and occasionally other related information.
- To enable WWT to maintain a record of your contribution to the project.
- In case we need to contact you with any queries about the records you provide for the purpose of validating the survey data.

In data protection terms, our 'legal basis' for collecting your personal data for use in this way is that we have a 'legitimate interest'. That is, we use the personal information we control and process for GSMP in a way that individuals would reasonably expect as part of their participation in the project. The GSMP project has minimal impact on the privacy of individuals and there are no concerns regarding the safeguarding of vulnerable people.

## What personal information we may hold and process about you

- Name
- Email address
- Postal address
- Telephone number
- When you submit survey data to the GSMP, your name will be included alongside the survey information (including location, date/time) to form the biological record.

WWT will only store personal information for participants aged 16 or over. Children under the age of 16 wishing to participate in GSMP surveys must be accompanied by a parent/carer or someone with parental responsibilities. Any personal data provided (including the recorder's name provided with the biological records) must be that of the responsible adult.

## How we store your information

WWT ensures that there are appropriate controls in place to protect personal details provided to the organisation. All of your personal data are stored in a database held on secure servers. The database is only accessible by approved staff. Paper-based information is stored securely as required by GDPR.

Whilst maintaining a record of any preferences expressed by you not to be contacted, WWT will store your personal information for as long as it is required for the purposes it was collected (as stated above), and also to:

- Continue to provide you with information about the GSMP if you choose to no longer participate but wish to continue receiving such information. You can opt out of receiving this information at any time.
- Enable WWT to match you to your previous biological records should you retire as a current participant but then choose to re-join at a later date.

The component of your personal data that forms the biological record (*i.e.* your name, and the location and time of the record) will be kept permanently as part of the scientific dataset for verification and validation of the biological records, and for the purpose of scientific research by WWT using historical records.

## How we share your information

WWT may need to share a recorder's personal details with a Local Organiser (an individual who has helped WWT organise and administer a GSMP survey in a particular area or at a particular site). Under such circumstances, the recorders will be informed in advance before sharing their details with the Local Organiser.

Other than as set out above, WWT will not share your personal information with anyone else. WWT will not use your personal information for marketing purposes by WWT.

## Your rights

### **Subject access**

You have the right to request at any time the information WWT holds about you (known as a Subject Access Request). If you wish to submit such a request, please contact WWT as detailed below. Depending on the nature of the request, we may need to seek further verification of your identity. The information requested will be supplied within 30 calendar days of the request or the verification, whichever is the later.

### **Rectification**

If you believe the personal information WWT holds about you is incorrect or incomplete, you have the right to ask WWT to correct it. WWT will respond within one month of the request being received. If you wish to submit such a request, please contact WWT as detailed below.

Registered users of WWT's Waterbird Monitoring Online recording website (<http://monitoring.wwt.org.uk/recording/>) can also view and edit their details at any time by logging on to the site and going to the 'My account' pages.

### **Objection and erasure**

You have the right to object to WWT processing your personal data where we have relied on legitimate interests as the lawful basis for processing. WWT can continue to store the data to ensure the request can be respected in the future. You also have the right to request that we restrict, stop processing or delete your data. If you wish to submit such a request, please contact WWT as detailed below.

WWT can refuse to comply with a request for erasure where the personal data is processed for legal reasons or other scenarios that may be in the public interest as specified by the ICO.

### **Portability**

Where you have given consent for WWT to process your data, you have the right to ask WWT to provide your personal details to another organisation via a commonly used open format such as a CSV file. If you wish to submit such a request, please contact WWT as detailed below.

### **Compensation**

If individuals believe they have suffered damage because WWT has behaved in breach of Data Protection law, they are entitled to claim compensation. This right can only be enforced through the courts.

The law allows WWT to defend a claim for compensation on the basis that the organisation took all reasonable care in the circumstances to avoid the breach, that is, by complying with Data Protection legislation when processing data.

### ***Querying automated decisions***

Individuals can ask WWT not to make automated decisions based on their personal data; expect to be advised if the organisation may use automated processes to make such decisions; and challenge the results of automated decisions they believe them to be inaccurate. Questions and requests regarding automated decisions can be submitted by contacting WWT as details below.

If you have any concerns about how your data are being used, we will try to answer any questions you have. You have the right to lodge a complaint with the Information Commissioner's Office (ICO). Details of how to do this can be found at <https://ico.org.uk/make-a-complaint/>.

## **Our contact details**

### ***Submit a request concerning your rights***

If you would like to submit a Subject Access Request or any other request concerning your rights (see above), please contact WWT.

- Write to Jenelle Murray-King, Supporter Service Manager, Wildfowl & Wetlands Trust, Slimbridge, Gloucestershire GL2 7BT
- Email: [subjectaccess@wwt.org.uk](mailto:subjectaccess@wwt.org.uk)
- Telephone: 01453 891198

### ***Queries about the privacy policy***

If you have any questions about this privacy policy, please contact WWT's Monitoring Unit.

- Write to: Monitoring Unit (Conservation Science), WWT Slimbridge, Gloucestershire GL2 7BT
- Email: [monitoring@wwt.org.uk](mailto:monitoring@wwt.org.uk)

## **Changes to the privacy policy for the GSMP**

This Privacy Policy may be updated from time to time. The latest version will always be available at <https://monitoring.wwt.org.uk/privacy-policy/> (see Privacy Policy for GSMP Participants) and <https://monitoring.wwt.org.uk/recording/>.

If changes are made to this privacy policy in the future, a prominent notice will be posted on these websites.