#### DATA PRIVACY NOTICE

Last updated 25.09.23

This privacy notice for the Sustainable Tenterden community group ("we," "us," or "our"), describes how and why we might collect, store, use, and/or share ("process") your information when you engage with our services ("Services"), such as when you: visit our website at <a href="www.sustainable-tenterden.org">www.sustainable-tenterden.org</a>, submit a contact form, submit a volunteer registration form, or make a donation to us via the Just Giving service.

Questions or concerns? Reading this privacy notice will help you understand your privacy rights and choices. If you do not agree with our policies and practices, please do not use our Services. If you still have any questions or concerns, please contact us at <a href="mailto:sustainabletenterden@outlook.com">sustainabletenterden@outlook.com</a>.

#### SUMMARY OF KEY POINTS

This summary provides key points from our privacy notice, but you can find out more details about any of these topics by clicking the link following each key point or by using our table of contents below to find the section you are looking for.

What personal information do we process? When you visit, use, or navigate our Services, we may process personal information depending on how you interact with Sustainable Tenterden and the Services, the choices you make, and the features you use. Learn more about personal information you disclose to us.

Do we process any sensitive personal information? We do not process sensitive personal information.

Do we receive any information from third parties? We receive information from social media platforms, and other outside sources. Learn more about information collected from other sources.

How do we process your information? We process your information to provide, improvements to our website, communicate with you, and to comply with law. We may also process your information for other purposes with your consent. We process your information only when we have a valid legal reason to do so.

How do we keep your information safe? We have organisational and technical processes and procedures in place to protect your personal information. However, no electronic transmission over the internet or information storage technology can be guaranteed to be 100% secure, so we cannot promise or guarantee that hackers, cybercriminals, or other unauthorised third parties will not be able to defeat our security and improperly collect, access, steal, or modify your information.

What are your rights? Depending on where you are located geographically, the applicable privacy law may mean you have certain rights regarding your personal information. Learn more about your privacy rights.

How do I exercise my rights? The easiest way to exercise your rights is by contacting us. We will consider and act upon any request in accordance with applicable data protection laws.

Want to learn more about what Sustainable Tenterden does with any information we collect? Review the privacy notice in full.

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## 1. WHAT INFORMATION DO WE COLLECT?

Personal information you disclose to us

In Short: We collect personal information that you provide to us.

We collect personal information that you voluntarily provide to us when you submit a contact form on our website www.sustainable-tenterden.org submit a volunteer application, make a donation, or otherwise when you contact us.

Personal Information Provided by You. The personal information that we collect depends on the context of your interactions with us and the choices you make, and the features you use. The personal information we collect may include the following:

Your:

**Full Name** 

Contact Details [email and phone number]

DOB

Any relevant physical or mental health conditions

Gender Ethnicity

Volunteer Registrations. We collect the information you submit to us via our volunteer registration forms. We use a third-party provider Jotform (Jotform Inc) to collect and store this information. Jotform Inc. stores your information securely and does not sell or make it available to anyone but the Community group. You can find their privacy notice here: <u>Jotform Inc Privacy Notice</u>.

Donation Payment Data. We do not collect payment data. Our third-party provider, Just Giving, processes donation payments and stores data on our behalf. You can find their privacy notice here: <u>Just Giving Privacy Policy</u>.

All personal information that you provide to us must be true, complete, and accurate, and you must notify us of any changes to such personal information.

Information automatically collected

Our website is hosted by Squarespace. Squarespace collects personal data when you visit this website, including:

Information about your browser, network and device Web pages you visited prior to coming to this website Web pages you view while on this website Your IP address

Squarespace needs the data to run this website and to protect and improve its platform and services. Squarespace analyses the data in a de-personalised form.

Squarespace Analytics. Our website collects personal data to power our site analytics; in addition to the above information, they may also collect details about your use of our website, including:

- Clicks
- Internal links
- Pages visited
- Scrolling
- Searches
- Timestamps

We share this information with Squarespace, our website analytics provider, to learn about site traffic and activity.

In order to improve visitor experiences to our website, we track how visitors use and interact with our website using <u>Hotjar</u>. We are bound by Hotjar's <u>Privacy Policy</u>, <u>Terms of Service</u>, and <u>Acceptable Use Policy</u>. More information about Hotjar can be found on their <u>website</u>.

Hotjar may temporarily process your IP address so that they can ensure their service is running smoothly and improve the quality of their platform. Any IP addresses they process are used exclusively for associated performance metrics (i.e. data related to how well their platform performs on our website) and to monitor and track application errors. For this purpose, they may temporarily store your IP address with Hotjar's Sub-Processors which are subject to strict obligations of confidentiality and will process it only according to their instructions. They will never access these IP addresses without any operational or security need. They automatically delete any IP addresses they process or store within thirty (30) calendar days. The legal basis for this data processing is Article 6(1)(f) GDPR.

Depending on the web browser you use, it might be possible for you to disallow Hotjar from collecting Data when visiting this website. To discover if your web browser offers this functionality, visit their Do Not Track page.

Please note that Hotjar cannot respond to any requests about your Personal Data, including requests to provide, rectify or delete any end-user Personal Data. Any requests should be emailed to Sustainable Tenterden sustainabletenterden@outlook.com. We will deal with all such requests.

Social Media. If you interact with us on social media platforms using your social media account (i.e. Facebook), we receive personal information about you, such as your name, email address, and gender. Any personal information that we collect from your social media account depends on your social media account's privacy settings.

# 2. HOW DO WE PROCESS YOUR INFORMATION?

In Short: We process your information to improve our website, communicate with you, respond to your requests, and to comply with law. We may also process your information for other purposes with your consent.

We will process the information you provide to us when contacting us, applying to become a volunteer and making donations.

To save or protect an individual's vital interest. We may process your information when necessary to save or protect an individual's vital interest, such as to prevent harm.

# 3. WHAT LEGAL BASES DO WE RELY ON TO PROCESS YOUR INFORMATION?

In Short: We only process your personal information when we believe it is necessary and we have a valid legal reason (i.e., legal basis) to do so under applicable law, like with your consent, to comply with laws, to fulfil our contractual obligations or to protect your rights.

If you are located in the EU or UK, this section applies to you.

The General Data Protection Regulation (GDPR) and UK GDPR require us to explain the valid legal bases we rely on in order to process your personal information. As such, we may rely on the following legal bases to process your personal information:

Consent. We may process your information if you have given us permission (i.e., consent) to use your personal information for a specific purpose. You can withdraw your consent at any time.

Legal Obligations. We may process your information where we believe it is necessary for compliance with our legal obligations, such as to cooperate with a law enforcement body or regulatory agency, exercise or defend our legal rights, or disclose your information as evidence in litigation in which we are involved.

Vital Interests. We may process your information where we believe it is necessary to protect your vital interests or the vital interests of a third party, such as in situations involving potential threats to the safety of any person.

If you are located in Canada, this section applies to you.

We may process your information if you have given us specific permission (i.e., express consent) to use your personal information for a specific purpose, or in situations where your permission can be inferred (i.e., implied consent). You can withdraw your consent at any time. Click here to learn more.

In some exceptional cases, we may be legally permitted under applicable law to process your information without your consent, including, for example:

If collection is clearly in the interests of an individual and consent cannot be obtained in a timely way

If it is contained in a witness statement and the collection is necessary to assess, process, or settle an insurance claim

For identifying injured, ill, or deceased persons and communicating with next of kin If we have reasonable grounds to believe an individual has been, is, or may be victim of financial abuse

If it is reasonable to expect collection and use with consent would compromise the availability or the accuracy of the information and the collection is reasonable for purposes related to investigating a breach of an agreement or a contravention of the laws of Canada or a province

If disclosure is required to comply with a subpoena, warrant, court order, or rules of the court relating to the production of records

If it was produced by an individual in the course of their employment, business, or profession and the collection is consistent with the purposes for which the information was produced If the collection is solely for journalistic, artistic, or literary purposes

If the information is publicly available and is specified by the regulations

# 4. WHEN AND WITH WHOM DO WE SHARE YOUR PERSONAL INFORMATION?

In Short: We may share information in specific situations described in this section and/or with the following categories of third parties.

Vendors and Other Third-Party Service Providers. We may share your data with third-party vendors, service providers, contractors, or agents ("third parties") who perform services for us or on our behalf and require access to such information to do that work. We have

contracts in place with our third parties, which are designed to help safeguard your personal information. This means that they cannot do anything with your personal information unless we have instructed them to do it. They will also not share your personal information with any organisation apart from us. They also commit to protect the data they hold on our behalf and to retain it for the period we instruct. The categories of third parties we may share personal information with are as follows:

Cloud Computing Services
Communication & Collaboration Tools
Data Analytics Services
Data Storage Service Providers
Finance & Accounting Tools
Government Entities
Payment Processors
Performance Monitoring Tools
Social Networks
Website Hosting Service Providers

#### 5. WHAT IS OUR STANCE ON THIRD-PARTY WEBSITES?

In Short: We are not responsible for the safety of any information that you share with third parties that we may link to but are not affiliated with, our Services.

The website links to third-party websites, online services and/or contain advertisements from third parties that are not affiliated with us and which may link to other websites, services, or applications. Accordingly, we do not make any guarantee regarding any such third parties, and we will not be liable for any loss or damage caused by the use of such third-party websites, services, or applications. The inclusion of a link towards a third-party website, service, or application does not imply an endorsement by us. We cannot guarantee the safety and privacy of data you provide to any third parties. Any data collected by third parties is not covered by this privacy notice. We are not responsible for the content or privacy and security practices and policies of any third parties, including other websites, services, or applications that may be linked to or from the Services. You should review the policies of such third parties and contact them directly to respond to your questions.

#### 6. DO WE USE COOKIES AND OTHER TRACKING TECHNOLOGIES?

In Short: We use cookies and other tracking technologies to collect and store your information.

Cookies. Our website uses cookies and similar technologies, which are small files or pieces of text that download to a device when a visitor accesses a website. Cookies are collected by Squarespace and Hotjart.

Squarespace. These <u>functional and required cookies</u> are always operational in order to allow securely serve this website to you. <u>These analytics and performance cookies are used on this website</u>, as described, only when you acknowledge our cookie banner. This website uses analytics and performance cookies to view site traffic, activity, and other data.

Hotjar. Hotjar Tracking Code cookies are set on a visitor's browser when they visit a website that loads the Hotjar Tracking Code. These cookies allow the Hotjar Tracking Code to function correctly. Apart from cookies, the Hotjar Tracking Code uses local and session storage as well. Full details of cookies can be found here.

#### 7. IS YOUR INFORMATION TRANSFERRED INTERNATIONALLY?

In Short: We may transfer, store, and process your information in countries other than your own.

Our servers are located in Dublin, Ireland. If you are accessing our website from outside Ireland, please be aware that your information may be transferred to, stored, and processed by us in our facilities and by those third parties with whom we may share your personal information (see "WHEN AND WITH WHOM DO WE SHARE YOUR PERSONAL INFORMATION?" above), in the UK, and other countries.

If you are a resident in the European Economic Area (EEA) or United Kingdom (UK), then these countries may not necessarily have data protection laws or other similar laws as comprehensive as those in your country. However, we will take all necessary measures to protect your personal information in accordance with this privacy notice and applicable law.

#### 8. HOW LONG DO WE KEEP YOUR INFORMATION?

In Short: We keep your information for as long as necessary to fulfil the purposes outlined in this privacy notice unless otherwise required by law.

We will only keep your personal information for as long as it is necessary for the purposes set out in this privacy notice, unless a longer retention period is required or permitted by law (such as tax, accounting, or other legal requirements). No purpose in this notice will require us keeping your personal information for longer than 7 years after you have ceased to donate to us or actively volunteer.

When we have no ongoing legitimate business need to process your personal information, we will either delete or anonymise such information, or, if this is not possible (for example, because your personal information has been stored in backup archives), then we will securely store your personal information and isolate it from any further processing until deletion is possible.

# 9. HOW DO WE KEEP YOUR INFORMATION SAFE?

In Short: We aim to protect your personal information through a system of organizational and technical security measures.

We have implemented appropriate and reasonable technical and organizational security measures designed to protect the security of any personal information we process. However, despite our safeguards and efforts to secure your information, no electronic transmission over the Internet or information storage technology can be guaranteed to be 100% secure, so we cannot promise or guarantee that hackers, cybercriminals, or other unauthorized third

parties will not be able to defeat our security and improperly collect, access, steal, or modify your information. Although we will do our best to protect your personal information, transmission of personal information to and from our Services is at your own risk. You should only access the Services within a secure environment.

### 10. DO WE COLLECT INFORMATION FROM MINORS?

In Short: We do not knowingly collect data from or market to children under 18 years of age.

We do not knowingly solicit data from or market to children under 18 years of age. By using the Services, you represent that you are at least 18 or that you are the parent or guardian of such a minor and consent to such minor dependent's use of the Services. If we learn that personal information from users less than 18 years of age has been collected, we will deactivate the account and take reasonable measures to promptly delete such data from our records. If you become aware of any data we may have collected from children under age 18, please contact us at <a href="mailto:sustainabletenterden@outlook.com">sustainabletenterden@outlook.com</a>.

#### 11. WHAT ARE YOUR PRIVACY RIGHTS?

In Short: In some regions, such as the European Economic Area (EEA), United Kingdom (UK), and Canada, you have rights that allow you greater access to and control over your personal information. You may review, change, or terminate your account at any time.

In some regions (like the EEA, UK, and Canada), you have certain rights under applicable data protection laws. These may include the right (i) to request access and obtain a copy of your personal information, (ii) to request rectification or erasure; (iii) to restrict the processing of your personal information; and (iv) if applicable, to data portability. In certain circumstances, you may also have the right to object to the processing of your personal information. You can make such a request by contacting us by using the contact details provided in the section "HOW CAN YOU CONTACT US ABOUT THIS NOTICE?" below.

We will consider and act upon any request in accordance with applicable data protection laws.

If you are located in the EEA or UK and you believe we are unlawfully processing your personal information, you also have the right to complain to your Member State data protection authority or UK data protection authority.

If you are located in Switzerland, you may contact the Federal Data Protection and Information Commissioner.

Withdrawing your consent: If we are relying on your consent to process your personal information, which may be express and/or implied consent depending on the applicable law, you have the right to withdraw your consent at any time. You can withdraw your consent at any time by contacting us by using the contact details provided in the section "HOW CAN YOU CONTACT US ABOUT THIS NOTICE?" below or updating your preferences.

However, please note that this will not affect the lawfulness of the processing before its withdrawal nor, when applicable law allows, will it affect the processing of your personal information conducted in reliance on lawful processing grounds other than consent.

Cookies and similar technologies: Most Web browsers are set to accept cookies by default. If you prefer, you can usually choose to set your browser to remove cookies and to reject cookies. If you have questions or comments about your privacy rights, you may email us at sustainabletenterden@outlook.com.

#### 12. CONTROLS FOR DO-NOT-TRACK FEATURES

Most web browsers and some mobile operating systems and mobile applications include a Do-Not-Track ("DNT") feature or setting you can activate to signal your privacy preference not to have data about your online browsing activities monitored and collected. At this stage no uniform technology standard for recognizing and implementing DNT signals has been finalized. As such, we do not currently respond to DNT browser signals or any other mechanism that automatically communicates your choice not to be tracked online. If a standard for online tracking is adopted that we must follow in the future, we will inform you about that practice in a revised version of this privacy notice.

# 13. DO WE MAKE UPDATES TO THIS NOTICE?

In Short: Yes, we will update this notice as necessary to stay compliant with relevant laws.

We may update this privacy notice from time to time. The updated version will be indicated by an updated "Revised" date and the updated version will be effective as soon as it is accessible. If we make material changes to this privacy notice, we may notify you either by prominently posting a notice of such changes or by directly sending you a notification. We encourage you to review this privacy notice frequently to be informed of how we are protecting your information.

# 14. HOW CAN YOU CONTACT US ABOUT THIS NOTICE?

If you have questions or comments about this notice, you may contact our Data Protection Officer, Phil Auden, via this email: sustainabletenterden@outlook.com.

# 15. HOW CAN YOU REVIEW, UPDATE, OR DELETE THE DATA WE COLLECT FROM YOU?

Based on the applicable laws of your country, you may have the right to request access to the personal information we collect from you, change that information, or delete it. To request to review, update, or delete your personal information, please email us: sustainabletenterden@outlook.com.