

# Privacy & Cookie Policy

IWA is committed to protecting your privacy and security. This policy explains how and why we use your personal data, to ensure you remain informed and in control of your information.

You can decide not to receive communications or change how we contact you at any time. If you wish to do so, please contact us:

- email ([membership@waterways.org.uk](mailto:membership@waterways.org.uk))
- post (Membership, The Inland Waterways Association, Island House, Moor Road, Chesham, HP5 1WA)
- telephone 01494 783453 (Lines open 9am to 5pm; Monday to Friday)

We will never sell your personal data, and will only ever share it with organisations we work with where necessary to provide services and if its privacy and security are guaranteed.

It's important that you read the full policy to understand what information we hold, how we may use it, and what your rights are – but if you don't have time to read it all now, here's a quick summary:

- We collect information that is either personal data (email address, name, telephone number, postal address) or non-personal data (such as IP addresses, website pages accessed, etc)
- We collect information about members, supporters, website users, volunteers and employees.
- We collect information to provide services or goods, to provide information, to fundraise, for administration, research, profiling, analysis, and for the prevention and detection of crime.
- We only collect the information that we need or that would be useful to us in our quest to provide the best possible service.
- We do our very best to keep personal information secure, including SSL technology (secure server software) wherever we collect personal data online.
- We never sell your data and we will never share it with another company or charity for marketing purposes.
- We only share data where we are required by law or to organisations we work with where necessary to provide IWA's services, and only then provided that the privacy and security of data is guaranteed
- Our websites use cookies – for more information check our cookies policy below.

## WHO ARE ‘WE’?

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‘We’ and ‘Us’ is IWA and our charitable and trading subsidiaries. Your personal data (i.e. any information which identifies you, or which can be identified as relating to you personally) will be collected and used by The Inland Waterways Association (IWA) (charity no. 212342), a non-profit distributing company limited by guarantee with registration number 612245.

For the purposes of data protection law, IWA will be the controller.

## WHAT INFORMATION WE COLLECT

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### **Personal data you provide**

We collect data you provide to us. This includes information you give when joining or registering, placing an order or communicating with us. There are several means by which The Inland Waterways Association collects personally identifiable data, for example:

- personal details (name / date of birth / email address / postal address / telephone number etc.) when you join as a member, donate as a supporter or sign-up as a volunteer;
- financial information (payment information such as credit/debit card or direct debit details, and whether donations are gift-aided. Please see Section 8 for more information on payment security); and
- details of your interests and preferences (such as campaigns and the ways you support us).
- If you purchase IWA membership as a gift for someone or join as joint members your details will be recorded (as will the recipient’s) and your relationship to that person will be recorded.

### **Information created by your involvement with IWA**

Your activities and involvement with IWA will result in personal data being created. This could include details of how you’ve helped us by volunteering or being involved with our campaigns and activities.

If you decide to donate to us then we will keep records of when and how much you give to a particular cause.

### **Information we generate**

We conduct research and analysis on the information we hold, which can in turn generate personal data. For example, by analysing your interests and involvement with our work we may be able to build a profile which helps us decide which of our communications are likely

to interest you. Section 7 (Research and profiling) contains more information about how we use information for profiling and targeted advertising.

### **Information from third parties**

We sometimes receive personal data about individuals from third parties. For example, if we are partnering with another organisation (e.g. you provide your information to another charity we're collaborating with on a restoration project). Also, as explained in Section 11 (Cookies and links to other sites), we may use third parties to help us conduct research and analysis on personal data (and this can result in new personal data being created).

We may collect information from social media where you have given us permission to do so, or if you post on one of our social media pages.

Occasionally, we may collect information about certain supporters (e.g. particularly well known or influential people) from public sources. This could include public databases (such as Companies House), news or other media. We don't do this to everyone, and it is the exception not the rule.

### **Sensitive personal data**

We do not normally collect or store sensitive personal data (such as information relating to health, beliefs or political affiliation) about supporters and members. However there are some situations where this will occur (e.g. if you volunteer with us or if you have an accident on one of our volunteering activities). If this does occur, we'll take extra care to ensure your privacy rights are protected.

### **Accidents or incidents**

If an accident or incident occurs on our property, at one of our events or involving one of our staff (including volunteers) then we'll keep a record of this (which may include personal data and sensitive personal data).

### **Volunteer**

If you are a volunteer (whether specifically for IWA or if you are helping us for other reasons – for example you work for another organisation which is running an event with us) then we may collect extra information about you (e.g. references, criminal records checks, details of emergency contacts, medical conditions etc.). This information will be retained for legal reasons, to protect us (including in the event of an insurance or legal claim) and for safeguarding purposes.

## HOW WE USE INFORMATION

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We only ever use your personal data with your consent, or where it is necessary in order to:

- enter into, or perform, a contract with you;
- comply with a legal duty;
- protect your vital interests;
- for our own (or a third party's) lawful interests, provided your rights don't override these.

In any event, we'll only use your information for the purpose or purposes it was collected for (or else for closely related purposes):

### **Marketing**

We use personal data to communicate with people, to promote IWA and to help with fundraising. This includes keeping you up to date with our news, updates, campaigns and fundraising information. For further information on this please see Section 6 (Marketing).

### **Administration**

We use personal data for administrative purposes (i.e. to carry out our charity work). This includes:

- receiving donations (e.g. direct debits or gift-aid instructions);
- maintaining databases of our volunteers, members and supporters;
- performing our obligations under membership contracts;
- fulfilling orders for goods or services (whether placed online, over the phone or in person);
- helping us respect your choices and preferences (e.g. if you ask not to receive marketing material, we'll keep a record of this).
- Internal research and analysis
- We carry out research and analysis on our supporters, donors and volunteers, to determine the success of campaigns and appeals, better understand behaviour and responses and identify patterns and trends. This helps inform our approach towards campaigning and makes IWA a stronger and more effective organisation. Understanding our supporters, their interests and what they care about also helps us provide a better experience (e.g. through more relevant communications).

### **Supporter research and profiling**

We evaluate, categorise and profile personal data in order to tailor materials, services and communications (including targeted advertising) and prevent unwanted material from filling up your inbox. This also helps us understand our supporters, improve our organisation and carry out research. Further information on profiling can be found in Section 7 (Research and profiling).

## DISCLOSING AND SHARING DATA

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We will never sell your personal data. If you have opted-in to marketing, we may contact you with information about our partners, or third party products and services, but these communications will always come from IWA and are usually incorporated into our own marketing materials (e.g. advertisements in magazines or newsletters).

We may share personal data with subcontractors or suppliers who provide us with services. For example, our quarterly magazine *Waterways* is printed and mailed by a mailing house and so your name and address is shared with the delivery company.

Occasionally, where we partner with other organisations, we may also share information with them (for example, if you register to attend an event being jointly organised by us and another charity). We'll only share information when necessary and we'll make sure to notify you first.

We will only ever share your data with such organisations where necessary to provide services and if the privacy and security of your data are guaranteed.

## MARKETING

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From 1st February 2018 IWA is asking its supporters to “opt-in” for most communications. This includes all our marketing communications (the term marketing is broadly defined and, for instance, covers information about our campaigns, events, news and IWA).

This means you'll have the choice as to whether you want to receive these messages and be able to select how you want to receive them (post, phone, email, text). This does not mean that all messages will be available in all formats.

You can decide not to receive communications or change how we contact you at any time. If you wish to do so please contact Membership by email ([membership@waterways.org.uk](mailto:membership@waterways.org.uk)), by post (Membership, The Inland Waterways Association, Island House, Moor Road, Chesham, HP5 1WA) or by telephone (01494 783453 Lines open 9am to 5pm, Monday to Friday).

### **What does ‘marketing’ mean?**

Marketing does not just mean offering things for sale, but also includes news and information about: our charity, campaigns, restoration and protection work; IWA benefits and offers; volunteering opportunities and how you can help protect and restore our waterways; appeals and fundraising (including donations and also competitions, raffles etc.); our events, activities and local branches; products, services and offers (our own, and those of third parties which may interest you); leaving a legacy; and taking part in projects (e.g. Love your Waterways).

When you receive a communication, we may collect information about how you respond to or interact with that communication, and this may affect how we communicate with you in future.

### **Newsletters and magazines**

Waterways magazine is sent to all our members (unless you specifically ask us not to) and you can choose to unsubscribe from general marketing communications without giving up your subscription to Waterways. However, please be aware that our member magazine pack does include advertisements, inserts, competitions and fundraising information.

If you are a member of IWA you can unsubscribe from general marketing but continue to receive your local branch newsletter or Waterway Recovery Group newsletter if you wish.

### **Fundraising**

As a charity, we rely on donations and support from others to continue our campaign work. From time to time, we will contact members and supporters with fundraising material and communications. This might be about an appeal, a competition we're running, or to suggest ways you can raise funds (e.g. a sponsored event or activity, or even buying a product if IWA will receive some of the proceeds).

As with other marketing communications, we'll only contact you specifically about fundraising if you've opted in to receiving marketing from us (and you can, of course, opt out at any time).

## **RESEARCH AND PROFILING**

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This section explains how and why we use personal data to build profiles which enable us to understand our supporters, improve our relationship with them, and provide a better supporter experience.

### **Analysis and grouping**

We analyse our supporters to determine common characteristics and preferences. We do this by assessing various types of information including behaviour (e.g. previous responses) or demographic information (e.g. age or location).

By grouping people together on the basis of common characteristics, we can ensure that group is provided with communications, products, and information which is most important to them. This helps prevent your inbox from filling up, and also means we aren't wasting resources on contacting people with information which isn't relevant to them.

## **Profiling to help us understand our supporters**

We profile supporters in terms of financial, political and practical support. For example, we keep track of the amount, frequency and value of each person's support. This information helps us to ensure communications are relevant and timely.

On occasion, we may also combine information about particular supporters with external information (such as directorships listed on Companies House, or news about an individual which has featured in the media) in order to create a more detailed profile about a particular individual.

We collect information on preferences and interests (e.g. whether you are interested in canal restoration or boating on certain waterways) so that we know what material you are mostly likely to be interested in.

## **Anonymised data**

We may aggregate and anonymise personal data so that it can no longer be linked to any particular person. This information can be used for a variety of purposes, such as recruiting new supporters, or to identify trends or patterns within our existing supporter base. This information helps inform our actions and improve our campaigns, products/services and materials.

## **HOW WE PROTECT DATA**

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We employ a variety of physical and technical measures to keep your data safe and to prevent unauthorised access to, or use or disclosure of your personal information.

### **Payment security**

All electronic IWA forms that request financial data will use the Secure Sockets Layer (SSL) protocol to encrypt the data between your browser and our servers.

If you use a credit card to donate, purchase a membership or purchase something on-line we will pass your credit card details securely to our payment providers (currently Barclays and Verifone). Other payment methods are handled in a similar manner. IWA complies with the payment card industry data security standard (PCI-DSS) published by the PCI Security Standards Council, and never store card details electronically.

Of course, we cannot guarantee the security of your home computer or the internet, and any online communications (e.g. information provided by email or our website) are at the user's own risk.

## STORAGE

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### **Where we store information**

IWA's operations are based in the UK and we store our data within the European Union. Some organisations which provide services to us may transfer personal data outside of the EEA, but we'll only allow them to do so if we believe your data is adequately protected.

For example, some of our systems use Microsoft products. As a US company, it may be that using their products result in personal data being transferred to or accessible from the US. However, we accept this as we are certain personal data will still be adequately protected (as Microsoft is certified under the USA's Privacy Shield scheme).

### **How long we store information**

We will only use and store information for so long as it is required for the purposes it was collected for. How long information will be stored for depends on the information in question and what it is being used for. We may also be required to store data to satisfy legal requirements, for financial audit purposes or to satisfy insurance requirements.

If you ask us not to send you marketing emails, we may retain your email address to ensure that we don't send marketing material to that e-mail address (though we'll keep a record of your preference not to be emailed). We may also retain your email address for other purposes, such as for administration if you are a member of IWA or have a mooring on the Chelmer & Blackwater Navigation.

We continually review what information we hold and delete what is no longer required. We never store payment card information on paper.

## KEEPING IN CONTROL

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We want to ensure you remain in control of your personal data. Part of this is making sure you understand your legal rights, which are as follows: the right to confirmation as to whether or not we have your personal data and, if we do, to obtain a copy of the personal information we hold (this is known as a subject access request); the right to have your data erased (though this will not apply where it is necessary for us to continue to use the data for a lawful reason); the right to have inaccurate data corrected; the right to object to your data being used for marketing or profiling; and where technically feasible, you have the right to personal data you have provided to us which we process automatically on the basis of your consent or the performance of a contract. This information will be provided in a common electronic format.

Please keep in mind that there are exceptions to the rights above and, though we will always try to respond to your satisfaction, there may be situations where we are unable to do so.

If you would like further information on your rights or wish to exercise them, please write to Membership at The Inland Waterways Association, Island House, Moor Road, Chesham, HP5 1WA or telephone 01494 783453 (Lines open 9am to 5pm, Monday to Friday) or email [membership@waterways.org.uk](mailto:membership@waterways.org.uk).

## **Complaints**

You can complain to IWA directly by contacting the Administration Manager using the details set out above.

If you are not happy with our response, or you believe that your data protection or privacy rights have been infringed, you can complain to the UK Information Commissioner's Office which regulates and enforces data protection law in the UK. Details of how to do this can be found at [www.ico.org.uk](http://www.ico.org.uk)

## **COOKIES AND LINKS TO OTHER SITES**

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### **Cookies**

Our website uses local storage (such as cookies) to provide you with the best possible experience and to allow you to make use of certain functionality (such as being able to shop online). Further information can be found here in our Cookies Policy.

Cookies' are small text files that are placed on a user's computer hard drive by a website. There are several types of cookie and the most common are often referred to as 'session' cookies. These are used to keep track of information needed by a user as they travel from page to page within a website. These cookies have a short lifetime and expire within a few minutes of the user leaving the site.

IWA uses benign, short lived 'session' cookies and 'first party' cookies to tell whether a website user has logged-in, where to find details that can be used to pre-fill parts of on-line forms and to personalise the user's visit to the website. They are necessary for the e-commerce and member log-in parts of the site to work correctly. By use of the website you are consenting for this use of cookies.

IWA's website uses Google Analytics, a web analytics service provided by Google Inc. (Google). Google Analytics uses cookies to help the website analyse how visitors use the site. The information generated by the cookie about your use of the website (including your IP address) will be transmitted to and stored by Google on servers in the United States of America. Google will use this information for the purpose of evaluating your use of the website, compiling reports on website activity for IWA and providing other services relating to website activity and internet usage. Google may also transfer this information to third parties where required to do so by law, or where such third parties process the information on

Google's behalf. Google will not associate your IP address with any other data held by Google.

Other types of cookies can be used to track internet activity after the user has left a website. These are either sponsored by organisations external to the website being visited (known as 'third party' cookies) or can originate from the website organisation itself ('first party' cookies). These usually have a long lifetime with several months being quite common. They are 'harvested' and 'refreshed' whenever the user visits a page where the same or a similar cookie is being used. These are often used for delivering adverts that are more likely to be relevant to you. They are also used to limit the number of times you see an advertisement as well as help measure the effectiveness of the advertising campaign. IWA's websites ([www.waterways.org.uk](http://www.waterways.org.uk), [www.iwashop.com](http://www.iwashop.com), [www.wrg.org.uk](http://www.wrg.org.uk) and [www.essexwaterways.com](http://www.essexwaterways.com)) do not use third party cookies, but we do use advertising cookies to:

Identify that you have visited IWA's website, so that we can show you relevant information from IWA.

Provide Google's advertising network with information on your visit so that Google can present you with adverts that you may be interested in.

You may refuse the use of cookies by selecting the appropriate settings on your browser, however please note that if you do this you may not be able to use the full functionality of this website. It is also important not to exclude the benign and useful session cookies or first party cookies. If you do decide to refuse the use of cookies IWA recommends that you choose an option that rejects all third parties.

By using this website, you consent to the processing of data about you by Google in the manner and for the purposes set out above.

Further information about cookies is available at [www.aboutcookies.org](http://www.aboutcookies.org)

### **Links to other sites**

Our website contains hyperlinks to many other websites. We are not responsible for the content or functionality of any of those external websites (but please let us know if a link is not working by using the 'Contact us' link at the top of the page).

If an external website requests personal information from you (e.g. in connection with an order for goods or services), the information you provide will not be covered by IWA's Privacy Policy. We suggest you read the privacy policy of any website before providing any personal information.

When purchasing goods or services from any of the businesses that our site links to, you will be entering into a contract with them (agreeing to their terms and conditions) and not with IWA.

## CHANGES TO THIS PRIVACY POLICY

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We'll amend this Privacy Policy from time to time to ensure it remains up-to-date and accurately reflects how and why we use your personal data. The current version of our Privacy Policy will always be posted on our website.

This Privacy Policy was last updated on 9th February 2018.