



# CLINTON DEVON ESTATES

## Privacy Policy

### 1. Overview

This Privacy Policy applies to Clinton Devon Estates and includes activity conducted by East Devon Pebblebed Heaths Conservation Trust (a full list of company entities can be requested).

This statement describes the types of information we collect from you, how we use it, how we share it with others, how you can manage the information we hold, and how you can contact us. It also contains information about your data protection rights.

The contents of this statement may change from time to time, so you may wish to check this page occasionally to ensure you are still happy to share your information with us. Where possible, we will also contact you directly to notify you of these changes.

### 2. Responsibility

For any questions or to exercise your data rights and/or manage your information please contact the Estate via the details below:

- **Post:** Rolle Estate Office, Bicton Arena, East Budleigh, Devon, EX9 7BL
- **Email:** mail@clintondevon.com
- **Tel:** 01395 443881.

### 3. Ownership of Information

Clinton Devon Estates is the data controller of any information collected. We will not sell, share, or rent this information to others in ways different from those disclosed in this statement.

### 4. What is personal data?

Personal data is defined by the General Data Protection Regulation (EU Regulation 2016/679) (the GDPR) as 'any information relating to an identifiable person who can be directly or indirectly identified in particular by reference to an identifier'. Personal data is, in simpler terms, any information about you that enables you to be identified. Personal data covers obvious information, such as your name and contact details, but it also covers less obvious information, such as identification numbers, electronic location data, and other online identifiers.

### 5. Data Collection

#### *How and when we collect data*

We collect information about you when you use our website, register an interest in a property or land, apply for licenses issued by the Estate, or engage the Estate with land management activities. For example, when you:

- Get in touch with us by telephone, post, email, or in person
  - Contact us about Estate services and activity, including the rental of property or land
  - Apply for permission to conduct activities on Estate land (for example, fishing rights)
  - Supply a service to the Estate
  - Register to volunteer
  - Make a booking to attend an Estate activity
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- Make a booking to attend an equestrian event or supply a service at an equestrian event
- Make a donation Pebblebed Heaths Conservation Trust
- Sign up to receive our newsletters
- Use our website
- Submit information directly via sign-up forms.

We only collect information that is necessary, relevant and adequate for the purpose you are providing it for.

Sometimes, we may also need to collect personal data by law or under the terms of the contract we have with you. If you fail to provide that data when we request it, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with goods or services). In this case, we may have to cancel the service with you, but we will notify you if this is the case at that time.

### ***Types of data collected***

When opting in to receive specific correspondence about Clinton Devon Estates and associated activities, we will request your name, email address and type of interest in our activities. This information is gathered to enable us to contact you with relevant articles and information pertaining to your interest.

However, during other interactions with us, we may also need to collect some or all of the following:

- Name (including title)
- Address
- Phone number
- Date of birth
- Email address
- The date and time you used our services
- The pages you visited on our website and how long you visited us for
- Your IP address
- The website address from which you accessed our website
- Details of any transactions between you and us
- Where you engage with us in a business context, we may collect your job title, company contact details (including email addresses) and company details
- Any information within correspondence you send to us.

### ***Sensitive Personal Data***

We do not collect any special categories of personal data about you, including details about your race, ethnicity, religious or philosophical beliefs, political opinions, or trade union membership, nor do we collect any information about criminal convictions and offences.

If this changes in the future, we will let you know and take extra care to ensure your privacy rights are protected.

## **6. Use of information**

We will only process information that is necessary for the purpose for which it has been collected.

We will never send you unsolicited 'junk' emails or communications or share your personal information with anyone else who might.

You will be asked if you wish to receive newsletters about the Estate, and you always have the option not to receive this communication from us (and you can withdraw your consent or object at any time).

We may use your information:

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- To provide you with information relating to Estate activity that you request from us
- To meet our obligations arising from any contracts entered into by you and us
- To collect your donation and claim gift aid, securing the resources that we need to deliver our mission
- To manage administration of and communications about donations and legacies received
- To provide communications about our charitable activities and opportunities for you to support us
- To seek your views or comments on the services we provide
- To send you communications which you have requested and that may be of interest to you. These may include information about events, properties, employment opportunities, information about the Estate and our partners, as well as marketing material to promote and help with fundraising.
- For our internal purposes, including statistical or survey purposes, quality control, site performance and evaluation in order to improve our website
- To administer our website.

## **7. Legal basis for collecting or processing personal data**

We are committed to collecting and processing personal data with full regard for the General Data Protection Regulations (GDPR), the Privacy and Electronic Communications Regulations (PECR) and the principles of personal choice and control, transparency, fairness and security. As such, we will rely upon a legal basis for doing so, including:

### **Consent:**

Where you have provided your consent, we may use and process your information to contact you from time to time about relevant industry news updates and advice, events, training opportunities, or other information that we think may be of interest to you. You can withdraw your consent at any time by contacting us on the details here or, in relation to any messages you receive, by using the unsubscribe option included in those messages.

### **Contractual obligation:**

We may use and process your personal information where this is necessary to perform a contract with you and to fulfil and complete your expectations of the arrangements with you.

### **Legitimate Interests:**

We may use and process your personal information where it is necessary for us to carry out activities for which it is in our legitimate interests as a business to do so:

- To respond to correspondence you send to us and fulfil the requests you make to us (for example, requests for information about properties, land, public access, agricultural arrangements, forestry operations, equestrian activity, shooting and fishing rights and other specific services);
  - To provide services under contracts between us and third parties where such third parties are required to provide services to you or for subcontractors that we use to provide services to you (for example, contractors conducting works to maintain or repair a property).
  - To analyse, evaluate and improve our services so that your use of our websites and services are more useful and enjoyable (we will generally use data amalgamated from many people so that it doesn't identify you personally);
  - To verify the accuracy of information that we hold about you to ensure improved communications;
  - For network and information security purposes i.e. for us to take steps to protect your information against loss, damage, theft or unauthorised access;
  - To comply with a request from you in connection with the exercise of your rights (for example, where you have asked us not to contact you for marketing purposes, we will keep a record of this on our suppression lists to be able to comply with your request)
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**Legal Obligation:**

We may process your personal information to comply with legal requirements (for example, to comply with health, safety and/or environmental legislation). We may process your personal data without your knowledge or consent, where this is required or permitted by law.

**Vital Interest:**

Sometimes, we will need to process your personal information to contact you if there is an urgent health, safety and/or environmental notice and we need to tell you about it.

## 8. Sharing Personal Data

Your privacy is important to us, and we confirm that we will never release your personal details to any third party for their mailing and marketing purposes. In addition, we will not share your data unless you have requested us to do so, or we are required to release information to a third party by law, for example, by a court order or for the purposes of prevention of fraud or other crime.

We may pass your information to our third-party service providers, subcontractors and other associated organisations for the purposes of completing tasks and providing services to you on our behalf (for example, to conduct maintenance work on properties). However, when we use third-party service providers, we disclose only the personal information that is necessary to deliver the service and we have a contract in place that requires them to keep your information secure and not to use it for their own direct marketing purposes. Third-party service providers must treat all personal data received in accordance with the law.

## 9. Data security

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. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business and need to know. They would only process your personal data on our instructions, and they are subject to a duty of confidentiality.

We have implemented procedures to deal with any suspected personal data breach and will notify you and any particular regulator of a breach where we are legally required to do so.

**Accuracy of personal information**

The accuracy of your information is important to us. If your personal information changes or if any of the information we hold is inaccurate or out of date, please email us at [mail@clintondevon.com](mailto:mail@clintondevon.com) or write to us at Clinton Devon Estates, Rolle Estate Office, Bicton Arena, East Budleigh, Devon EX9 7BL. Alternatively, you can telephone 01395 443881.

## 10. Storing your information

All of the personal data we process is processed by our staff in the UK. Our staff receive data protection training, and we have a clear Data Protection Policy and associated guidance that staff are required to follow when handling personal data.

When we collect personal data, we make sure that your information is securely stored with the Estates SharePoint database.

We keep your personal information in accordance with our retention periods, outlined below. We will then dispose of your information by deleting all of your digital data and shredding any hardcopies.

**Fundraising**

In the case of fundraising, data will be stored electronically on a secure Constituent Resource Management ("CRM") database. Access to the database will be limited to Conservation Trust/Estate employees who are required to access it for organisational purposes. The CRM database is hosted on the servers of Clinton Devon Estates. Details may be saved in Estate servers, files, SharePoint, etc.

### ***Accidents or incidents***

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

## **11. Data retention periods**

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purpose of satisfying any legal, accounting or reporting requirements. When deciding what the correct time is to keep the data, we look at its amount, nature and sensitivity, potential risk of harm from unauthorised use or disclosure, the processing purposes, if these can be achieved by other means and legal requirements.

By law, we have to keep basic information about and transactional-related information for tax purposes for six years after the completion of the terms of engagement. The data we keep may include contact, identity, financial and transaction date.

In some circumstances you may ask us to delete your data and we will do this subject to any legal obligation on us to retain it.

If we have a relationship with you, we will hold your personal information for seven years from the date when our relationship ends. We hold your personal information for this period to establish, bring or defend legal claims.

If you have raised a complaint or concern regarding Estate activity, we will retain your information for a period of seven years following the date of that complaint or query.

Exceptions to this will be made where:

- the law requires us to hold your personal information for a longer period, or delete it sooner;
- you exercise your right to have the information erased (where it applies) and we do not need to hold it in connection with any of the reasons permitted or required under the law.

## **12. Your legal rights and how to opt-out**

Under data protection law, you have rights including:

- Your right of access - You have the right to ask us for copies of your personal information.
  - Your right to rectification - You have the right to ask us to rectify information you think is inaccurate. You also have the right to ask us to complete information you think is incomplete.
  - Your right to erasure - You have the right to ask us to erase your personal information in certain circumstances. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons, which will be notified to you, if applicable, at the time of your request.
  - Your right to restriction of processing - You have the right to ask us to restrict the processing of your information in certain circumstances.
  - Your right to object to processing - You have the right to object to the processing of your personal data in certain circumstances.
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- Your right to data portability - You have the right to ask that we transfer the information you gave us to another organisation, or to you, in certain circumstances.

You can see more about these rights on the ICO website:

<https://ico.org.uk/for-organisations/uk-gdpr-guidance-and-resources/individual-rights/>

If you wish to exercise any of the rights set out above, please email us at [mail@clintondevon.com](mailto:mail@clintondevon.com)

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive, or excessive or refuse to comply with it in these circumstances.

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to anyone with no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made several requests. In this case, we will notify you.

#### ***Opt-out of Information style communications***

You have a choice about whether you wish to receive information from us.

If you no longer want to receive digital information and communications from us, then you can change your preferences or completely unsubscribe in one of two ways:

- Click the 'unsubscribe' or 'change preferences' link at the bottom of emails sent to you; or
- Email [mail@clintondevon.com](mailto:mail@clintondevon.com) or telephone 01395 443881. We will process your request within seven days.

We will not contact you for purposes outside our required business correspondence by email, phone or text message unless you have given your prior consent.

If you opt out of receiving marketing communications, this opt-out does not apply to personal data provided as a result of other transactions, such as if we contact you to discuss a service you have asked us to provide.

#### **16 or under**

We are concerned about protecting the privacy of children aged 16 or under. If you are aged 16 or under, please advise us and confirm that you have your parent/guardian's permission beforehand whenever you provide us with personal information.

We keep this Policy under regular review.

### **13. Complaints**

If you are unhappy with our collecting or processing of your personal data, you have the right to lodge a complaint with the Information Commissioners Office (ICO), the UK Advisory Authority for data protection issues:

- **Website:** [www.ico.org.uk](http://www.ico.org.uk)
  - **Post:** Information Commissioner's Office Wycliffe House Water Lane Wilmslow Cheshire SK9 5AF
  - **Email:** [casework@ico.org.uk](mailto:casework@ico.org.uk)
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- Tel: 0303 123 1113

We would, however, appreciate the chance to deal with your concerns before you approach the ICO, so please contact us in the first instance.

#### **14. Pebblebed Heaths Conservation Trust**

Pebblebed Heaths Conservation Trust (“Pebblebed”) may also collect, process, and store personal information of actual or potential supporters, whether they are an individual, corporation, trust, or foundation, as part of our:

- Fundraising activities
- Wealth screening, conducted either in-house or through third-party suppliers
- Research to identify potential supporters through research online, in the news, and in the public domain
- Due diligence research of actual and prospective donors – e.g. for fraud protection
- Internal scoring of prospects/supporters to measure the likelihood and potential amount of their donations to Pebblebed
- Creation of donor profiles based on research from online and other sources

We rely upon our legitimate interest to engage with the public to further our charitable aims.

In addition to the ways in which we collect data outlined in section 5 above, we may also receive personal data when a friend, family member, or colleague shares your details with us because they think you will be interested in the charitable aims of the Pebblebed.

##### ***Criminal convictions***

We may collect criminal conviction data where it is appropriate as part of the due diligence we undertake in our Gift Acceptance process. We use criminal conviction data to inform decision-making on whether to accept a gift, if there is an indication that the entity has previously been convicted for financial fraud.

We process this data because of our legal obligation to prevent any corruption or bribery during the financial donations process and to protect the reputation of Pebblebed and the Estate.

##### ***Fundraising and communication***

As a charity, we rely on donations and support from others to continue our conservation work. Occasionally, we will contact supporters with fundraising material and communications. We want to give you relevant information and may use the information you provide to us or information in the public domain to do so. You can update your contact details or unsubscribe from our communications anytime. To do so, please contact [fundraising@pebblebedheaths.org.uk](mailto:fundraising@pebblebedheaths.org.uk).

##### ***Donor profiling and prospect research***

As a fundraising organisation, we undertake in-house research to find people and organisations who may be interested in supporting Pebblebed. We also look at people and organisations who already support us to see if they might be interested in supporting us further.

It is important that we ascertain how likely a person or entity is to donate and the level of support they can provide. This helps us prioritise our resources, tailor funding proposals and offer only appropriate opportunities.

We will use the information you have shared with us and/or information in the public domain. Occasionally, we engage specialist agencies to gather information about you from publicly available sources, for example, Companies House, the Electoral Register, company websites, ‘rich lists’, social networks such as LinkedIn, political and property registers and news archives. We may also carry out

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donor profiling to fast-track the research using our trusted third-party partners. You will always have the right to opt out of this processing.

We may also carry out research using publicly available information to identify individuals who may have an affinity to our cause but with whom we are not already in touch. This may include people connected to our current major supporters, trustees or other lead volunteers. We also use publicly available sources to carry out due diligence on donors in line with the charity's Gift Acceptance Policy and to meet money laundering regulations. This research helps us to understand more about you as an individual so we can focus conversations we have with you about fundraising and volunteering in the most effective way and ensure that we provide you with an experience as a donor or potential donor which is appropriate for you.

We conduct this profiling and research on the basis of our Legitimate Interest.

## **15. Website Specific Data**

### **Website Cookies**

Like many other websites, the Clinton Devon Estates and East Devon Pebblebed Heaths Conservation Trust websites use cookies. 'Cookies' are small pieces of information an organisation sends to your computer and stored on your hard drive to allow that website to recognise you when you visit. They collect statistical data about your browsing actions and patterns and do not identify you as an individual. For example, we use cookies to store your country preference. This helps us to improve our website and deliver a better, more personalised service.

It is possible to switch off cookies by setting your browser preferences. However, turning cookies off may result in a loss of functionality when using our website.

At Clinton Devon Estates, we want to reassure you that your privacy is respected and safe in our hands. We only collect information that helps us to help you get the most out of your visit to our site.

### ***How does our site use cookies?***

We may use a cookie to record previously established interests and preferences (via data submitted to us) to enhance the user experience. Because the cookie is client-side, i.e., on your hard drive, your privacy is in no way compromised. Depending on your personal preferences, you may deactivate cookies in your web browser or reject the creation of a cookie.

As with many other websites, we use cookies for several reasons, the main one being to monitor and measure what visitors do on our website. This allows us to know what areas of the site are popular, how often visitors come back, where they come from, whether they are using a PC or a mobile device and so on. Knowing how our site is being used means we can enhance users' experience in future.

We may also use some or all of the following types of cookies:

#### **a) Strictly Necessary Cookies**

A cookie falls into this category if it is essential to the operation of our site, supporting functions such as logging in.

#### **b) Analytics Cookies**

It is important for us to understand how you use our site, for example, how efficiently you can navigate around it, and what features you use. Analytics Cookies enable us to gather this information, helping us to improve our site and your experience of it.

#### **c) Functionality Cookies**

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Functionality Cookies enable us to provide additional functions to you on our site, such as personalisation and remembering your saved preferences. Some functionality cookies may also be strictly necessary cookies, but not all fall into that category.

**d) Targeting Cookies**

It is important for us to know when and how often you visit our site and which parts of it you have used (including which pages you have visited and which links you have visited). As with analytics cookies, this information helps us to better understand you and, in turn, to make our site and advertising more relevant to your interests.

**e) Third-Party Cookies**

Third-party Cookies are not placed by us; instead, they are placed by third parties that provide services to us and/or to you. Third-party Cookies may be used by advertising services to serve tailored advertising to you on Our Site or by third parties providing analytics services to us (these Cookies will work in the same way as analytics Cookies described above).

**f) Persistent Cookies**

Any of the above types of cookies may be persistent cookies. Persistent cookies remain on your computer or device for a predetermined period and are activated each time you visit our site.

**g) Session Cookies**

Any of the above types of cookies may be a session cookie. Session cookies are temporary and only remain on your computer or device from the point at which you visit our site until you close your browser. Session cookies are deleted when you close your browser.

***Opting out of cookies***

If you still decide to opt-out, you have two options:

1. You can adjust the settings on your internet browser to prevent cookies from being downloaded. How this is done varies according to which browser you are using, and we recommend you refer to the appropriate online help guides.
2. You can opt out of receiving specifically those cookies we use to track how people are using our site.

**IP Address Information**

We record what you access and the IP address you use to access the data each time you access it.

An IP address is a unique identifier given to you by your Internet provider when you connect to the Internet. This may differ each time you connect or be permanently assigned depending on your arrangements.

We use these addresses to track your movements, analyse broad trends such as geographical location and by such improve our quality of service.

IP addresses are not linked to personally identifiable information.

**Links to Other External Sites**

This website may contain links to other sites. Clinton Devon Estates and East Devon Pebblebed Heaths cannot be held responsible for the privacy practices of other such sites.

Please do not assume that other sites abide by our privacy standards. In addition, if you linked to our website from a third-party site, we cannot be responsible for the privacy policies and practices of the owners and operators of that third-party site and recommend that you check the policy of that third-party site.

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