

The Wildlife Information Centre (TWIC) Privacy Policy

Version 2; last updated 26/06/2020. Minor edits 30/06/2020.

Who we are

The Wildlife Information Centre (TWIC) is the Local Environmental Records Centre (LERC) for south-east and part of Central Scotland. TWIC collects, collates and disseminates biological data for our area. We are a company registered in Scotland (No SC234339) and a registered Scottish Charity SC034113.

Our contact details

For any privacy/GDPR query please contact Claudia Caporusso, the GIS and Data Officer via the email: GDPR@wildlifeinformation.co.uk or by phone on 01875 825968.

Our registered address is: The Wildlife Information Centre, Caretakers Cottage, Vogrie House, Vogrie Country Park, Nr Gorebridge, Midlothian, EH23 4NU.

The type of information we collect

The personal information we collect, and process may include your name, address, email address, telephone or mobile phone number and your reason for contacting us. Bank information may be held for employees, contractors, volunteers and suppliers. Medical and emergency contact information may be held for employees, volunteers and event participants.

How we collect information from you

Most of the personal information we process is provided to us directly by you, for example when you contact us for information, apply for membership, subscribe to our mailing lists, share data or submit records to us, register for an event, or apply to become a volunteer/ Director.

We also receive personal information indirectly, from the following sources in the following scenarios:

- The provision of biological records or data from dataset providers/ data partners, including online databases, which may include recorder names, addresses, usernames or contact information.
- The provision of landowner names and contact information from Local Authority partners for the purposes of managing Local Biodiversity Site/ Local Nature Conservation Site systems as part of contracted work.

How we use your information

We may use your information in order to:

- Respond to any enquiry you make
- Provide you with the information, products or services that you request from us
- Send you information on our events, or events organised by related organisations where you have subscribed
- Manage membership subscriptions and gift aid
- Communicate with you regarding the processing/ management of your biological records/ datasets, including record validation and verification checks

- Give you credit as the source/ originator of the data
- Communicate with you regarding recording excursions or biological surveys on your land, including the results of surveys
- Notify you of Local Biodiversity Site/ Local Nature Conservation Site designations on your land on behalf of the Local Authorities

Who we share your information with

- Recorder names and contact details are shared with data processing volunteers for the purposes of following up queries with recorders and for validation or verification purposes.
- Recorder/determiner names may be shared with National Recording Schemes and Societies, data partners and record verifiers.
- Information relating to landowners/ tenants for Local Biodiversity Sites / Local Nature Conservation Sites may be shared with Local Authorities partners, TWIC's surveyors/ volunteers and contractors for the purpose of fulfilling contracts.
- TWIC members names and emails may be shared with the secure mail platform Mailchimp, which we currently use to send out the TWIC newsletter.
- Anonymised versions of records may be provided to the National Biodiversity Network (NBN) Atlas and the Global Biodiversity Information Facility (GBIF). Recorder names may be uploaded with prior consent of the dataset provider/ recorder.

Legal Basis for processing your data

Under the General Data Protection Regulation (GDPR), the lawful basis we rely on for processing this information are:

- (a) Your consent (mailing lists and 'List of Local Experts' webpage). You are able to remove your consent at any time. You can do this by contacting us at info@wildlifeinformation.co.uk
- (b) We have a contractual obligation (as part of services to clients, our grant funder and Service Level Agreement holders)
- (c) We have a legal obligation or vital interest (employee and volunteer medical or emergency contact details)
- (d) We have a legitimate interest (managing memberships, processing records, managing datasets, managing volunteers or event participants)

How we store your personal information

Your personal data is stored securely on our password protected servers and on encrypted backup drives. Hardcopy materials with personal information are kept in locked cabinets. No volunteers, users or other people may have access to the office without either a Director or staff member being present. In the event of a hard drive failure, the affected hard drives are destroyed to prevent data breaches.

All computers at TWIC are protected by anti-virus and firewall software to guarantee a high level of cyber security.

TWIC's online cloud storage is protected by a strong password and by an embedded security system that monitors data security and possible breach in real-time.

Remote volunteers are trained in cyber-security, and passwords are routinely changed after volunteers have completed their work.

Retention Period

TWIC's retention periods vary depending on the type of the information.

- Recorder and determiner names attached to biological records will be held indefinitely. If you wish to submit biological records on behalf of other individuals, please verify that they agree with sharing their name with TWIC.
- Contact details for recorders will be held for a limited period after verification is completed, with a maximum retention period of 10 years in the event the record is never verified.
- Personal data obtained as part of events e.g. workshops and conferences will be deleted 1 month after the event, unless you opted into one of our mailing lists. Anonymised summary information on event participants, e.g. number and age of attendees, used for reporting to funders and to improve service delivery will be retained indefinitely.
- Contact information for our 'List of Local experts' webpage will be held for 1 year. After that we will contact you to confirm that a) the information is still correct and that you b) are happy for us to provide your details in this manner for another 12 months.
- TWIC is legally required to hold certain types of information to fulfil our statutory obligations (gift aid, etc.) and/or if it is set in the contract you hold with us.

Your data protection rights

Under the GDPR you have the following rights:

- The right to be informed – You have the right to know how your personal data is used by TWIC. This document is intended to be a clear description of how your data may be used.
- The right of access – You have the right to request a copy of all personal information that we hold on you as part of a Subject Access Request. Under the GDPR, TWIC has 30 days to respond to this. Please email GDPR@wildlifeinformation.co.uk for Subject Access Requests.
- The right to rectification – You have the right to ask TWIC to update your records where any information in them is inaccurate. TWIC will correct the data immediately.
- The right to erasure – You have the right to be forgotten. If you request that your personal data be removed from TWIC's systems, we will do so immediately. Where this concerns records TWIC would request that the data be pseudonymised instead, but if this is unacceptable to you we will remove your records also.
- The right to restrict processing – You have the right to ask for processing of your personal data to be restricted where you believe it is inaccurate or that there is no legitimate use for the processing of your personal data.
- The right to data portability – You have the right to request that TWIC transfer your personal data to another service provider, in a machine readable format.
- The right to object – You have the right to stop the processing of your data for marketing processes, or any of the legitimate interests that TWIC uses personal data for.

- The right to not be subject to automated decision-making including profiling – Where the data controller is using your personal data in an automated way to make decisions that have an effect on you, you have the right to object. TWIC does not use your personal data in this way.

More information about each of these rights can be found here: <https://ico.org.uk/for-the-public/>

Changes to this policy

If TWIC makes changes to this policy, an updated copy of this document will be made available on our website and will be distributed to relevant parties.

How to complain

If you have any concerns about our use of your personal information, you can make a complaint to us at GDPR@wildlifeinformation.co.uk or phone 01875 825968.

If you are still dissatisfied, you can contact the Information Commissioner's Office (ICO) by telephone: 0303 123 1113, by post to: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF. ICO Website: <https://ico.org.uk>.