

Privacy Notice

1. Overview

This Privacy Notice sets out how the RSPCA Northamptonshire Branch processes your personal data in connection with the provision of our services and our website at www.rspca-northamptonshire.com.

This Privacy Notice is intended to assist you in making informed decisions when using our Site and Services. Please read this privacy notice together with any other information that we may provide on specific occasions when we ask to collect or process your personal data so that you are fully aware of how and why we are using it.

RSPCA Branches are separately registered, volunteer run charities using a governing document approved by the national RSPCA. Our branches respect your privacy and are committed to protecting your personal data.

This Privacy Notice only applies to the use of your personal data obtained by us, whether from you directly or from a third party. It does not apply to personal data collected by third parties during your communications with those third parties or your use of their products or services (for example, where you follow links to third party websites over which we have no control, or you purchase goods or services from those third parties).

2. About Us

The Site and our Services are made available by the RSPCA Northamptonshire Branch, an incorporated charity, acting through its committee of trustees as registered with the Charity Commission under registration number 205377. The Branch is the data controller and is responsible for your personal data. We are registered with the Information Commissioner's Office under registration number ZA347583

If you have any questions about this Privacy Notice or if want to exercise your rights as a data subject set out in this Privacy Notice, you can contact us by email at Richard.burns@rspca-northamptonshire.org.uk

This privacy notice supplements any other specific notices provided by the Branch and is not intended to override them.

As our Site is hosted by the national RSPCA, charity number 219099, certain technical data will be processed by us and the national charity as joint data controllers. Please see the RSPCA's privacy notice for further details.



3. Personal data that we process

The following explains the types of data we collect and the legal basis for processing it under current data protection legislation.

If you enquire about our branch and our work, or wish to make a complaint, we will take your name, telephone contact number, email or postal address and a message. The legal basis for this may be to fulfil a contract with you (e.g. to be considered for adoption of an animal) or it is in our legitimate interest to provide certain services to you (for example, it is necessary for us to read and store your message so that we can respond in the way you would expect). We may also have a legitimate interest in sharing some of your personal data with the national Society, who support branches in governance and administration, including complaint handling.

If you wish to receive updates by email or post about our work, including fundraising updates we will take your name, email or postal address and a contact number. The legal basis for this is consent - you will need to have given us your active consent to be contacted in this way and can rescind this at any time. Further information will be given at the point we collect your data.

If you make a donation to us we will request your name, email address and postal address. In general we will not take your financial information but ask you to donate through your bank or via a third party processor (e.g paypal or Justgiving) who are data controllers in their own right. We may thank you for your donation on the basis of legitimate interest - this is necessary for us to fulfill your intention of receiving your donation and your expectation of receiving an acknowledgement.

If you ask us to claim gift aid on your donation we will collect the information that is required by HMRC because we have a legal obligation to obtain and process gift aid forms. This applies to both monetary donations and donations made through our charity shops. It is in our legitimate interest or a third party's legitimate interest to use your personal data in this way so that we can comply with regulatory requirements.

If you sign up as a branch member, the national RSPCA will take your name, address, email address and payment information, and they will be the data controller of this information. The legal basis for this is fulfilling a contract - by paying your membership fees and being accepted as a member, you have entered into a contractual relationship with the national RSPCA, governed by our Rules. If you consent to applying for Branch membership, your details will be passed to us (at which point we will become data controller) and your application/membership are governed by our governing document (Branch rules). It is in our legitimate interest to use your personal data in the ways described above to ensure that we are able to administer your membership, make membership features and benefits available to you, and provide any other relevant Services to you.

If you ask us to rehome your animal, we will take your name, address, email and contact numbers and any history relevant to the animal's welfare and behaviours, including veterinary information. The legal basis for this is performance of a contract with you to acquire the full legal title of the animal and to seek to rehome it. It is also in our legitimate interest or a third party's legitimate interest to use your personal data in the ways described above to ensure that we are able to provide rehoming services to you. We may seek your consent to contact your previous vet to obtain a veterinary history.



To register you as a potential adopter or to place an animal into your home for adoption or fostering we will ask you for your name, address, email and telephone numbers along with information about your family, home and lifestyle. The legal basis for this is performance of a contract with you (the adoption agreement). As part of our adoption/fostering process we may carry out a home visit to help match you with the right animal, and a part of this process may involve us using a Google map search. This home visit may be carried out by a volunteer or a member of staff of the Branch, or another charity within the RSPCA network, who will be acting for our Branch for these purposes. In processing your application, we may collect special category data, in particular about your health, and we will only process this information on the basis of your explicit consent and specifically for the purpose of ensuring a suitable match between you and the animal available for adoption/fostering (e.g. fur allergy).

To process your request for financial help towards veterinary costs we will take your name, address, contact number and email and ask to see proof of means tested benefits and identification. The legal basis for this is performance of a contract with you and so we can ensure you are eligible for our charitable services and that we deliver public benefit. We will issue you with a voucher or unique reference number for use by a vet in treating your animal and invoicing the Branch.

If you report an animal as lost or found we will not take your details directly, but refer you to Pets Located.

If we register or amend microchip details on an animal belonging to you we will ask you for your name, address, email and contact numbers in order to pass to the relevant microchip database company (principally Identibase, Anibase, Petlog). The legal basis for this is performance of a contract between you and the microchip company so that if your pet is missing, you can be reunited. For dogs, microchipping is also a legal obligation. It is also in our legitimate interest or a third party's legitimate interest to use your personal data in this way, so we can ensure that missing pets can be reunited with their owners.

If we scan a microchip in a stray animal we will contact the microchip database company and follow their process to contact you to let you know we've found your pet. The legal basis for this is our legitimate interest as an animal welfare organisation in matching stray animals with owners. If, after taking all reasonable steps to trace an owner, we are unable to make contact, we will seek to rehome the animal and re-register the microchip accordingly.

To register your interest in volunteering or applying for a job with the branch we will collect your name, address, email and contact telephone numbers and ask you for details regarding your application. Sometimes, criminal records and other checks may be required in line with our safeguarding and legal obligations. In processing your application, we may collect special category data, in particular about any disability, and we will only process this information on the basis of your explicit consent and specifically for the purpose of ensuring we meet our legal obligations (e.g to make reasonable adjustments). We may also seek references who will need to consent to being contacted by the Branch. Next of kin details will also be requested if your application is successful, as part of our legal responsibility for your safety whilst with us. Occasionally we need to contact a third party if concerned about your vital interests (e.g in a medical emergency). We may also have a legitimate interest in sharing some of your personal data with the national RSPCA, who support branches in governance and administration, including recruitment of staff and volunteers.



Where we use your personal data in connection with recruitment, it will be in connection with us taking steps at your request to enter into a contract we may have with you or it is in our legitimate interest to use personal data in such a way to ensure that we can make the best recruitment decisions.

We may have installed CCTV systems in some of our premises for the purposes of our legitimate interest in crime prevention and detection. CCTV is also installed on the outside of some of our buildings for the purpose of monitoring the security of our people and property. Images captured by CCTV will not be kept for longer than necessary however, on occasions, there may be a reason to keep images for longer (e.g if a crime is being investigated). You have the right to access CCTV images of yourself. Signage advising of CCTV equipment will give notice of areas covered by CCTV. It is in our legitimate interest to process your personal data in this way so that we can keep our premises secure and provide a safe environment for our animals, personnel and visitors to our premises.

We may use images of you and/or your pet in relation to promoting our charitable activities or fundraising. Please note that we (or our authorised partners) may film or photograph participants, volunteers and spectators attending or taking part in our events and use such footage or photographs. We do this in order to publicise our work in advertising, publications, marketing material, social media, personalised direct mail and other media that may be made available to the public.

No personal details (including names) of any under 16-year-olds will be used in any publicity materials without their written consent or that of their parent or legal guardian (depending on their age), but we may use images where children are incidentally included (for example, images of mass participation) but will give older children, or their parents/guardians, the opportunity to opt out.

We would ideally like to obtain your explicit consent before processing any images that would identify you directly (such as photos of you in a small group) but in mass participation events where

this is not practical we would ask you to contact the branch or its photographers, who should be easy to identify, in order to opt out.

We do display images of animals that have been adopted and in the majority of cases this will not be considered as personal data. However as an adopter of an animal, you can always request at adoption that their image is not used, or that it is removed from the branch's channels at any time.

If you participate in a fundraising event that we have organised such as an annual fair, dog show, raffle, competition or prize draw etc we may take your name and contact telephone number in order to administer the event. It is in our legitimate interest or a third party's legitimate interest to use your personal data in this way to promote our charity and our Services.

If you use a veterinary clinic that is run by us for subsidising treatment of your animal, we rely on our veterinary surgeons to process personal data in accordance with <u>RCVS guidelines</u>.

If you use our website, your website activity will be collected through cookies, in line with our cookie policy. It is necessary for us to use your personal data to perform our obligations in accordance with any contract that we may have with you for the Services, or it is in our legitimate interest or a third party's legitimate interest to use personal data in such a way to ensure that we provide access to our Site in a secure and effective way and so that we can improve our Site.



4. Sharing personal data

When processing your personal data, we may need to share it with third parties (including other entities within the RSPCA group), as set out in the table below. This list is non-exhaustive and there may be circumstances where we need to share personal data with other third parties. However, we only share personal data with others when we are legally permitted to do so. When we share personal data with others, we put contractual arrangements and security mechanisms in place to protect the personal data shared and to comply with our data protection, confidentiality and security standards and obligations.

Third-party suppliers who provide applications/ functionality, data processing or IT services	We share personal data with third parties who support us in providing our Site and help provide, run and manage our IT systems. Such third parties may also include, for example, providers of information technology, cloud-based software-as-a-service, website design, hosting and management, data back-up, security and storage services.
Payment providers and banks	We share personal data with third parties who assist us with the processing of payments.
Printing, delivery and courier companies	We my share personal data with suppliers who assist us in the delivery of Services.
Event partners and suppliers	When we run events, we will share your personal data with third-party service providers that are assisting us with the operation and administration of that event. If we are running an event in partnership with other organisations, we will share your personal data with such organisations for use in relation to the event.
Recruitment agencies and related organisations	We share personal data with external recruiters, third-party providers that undertake background checks on our behalf and other entities within our group of companies.
Auditors, lawyers, accountants and other professional advisers	We share personal data with professional services firms who advise and assist us in relation to the lawful and effective management of our organisation and in relation to any disputes we may become involved in.
Law enforcement or other government and regulatory agencies and bodies	We share personal data with law enforcement or other government and regulatory agencies or other third parties as required by, and in accordance with, applicable law or regulation.
Other third parties	Occasionally, we may receive requests from third parties with authority to obtain disclosure of personal data, such as to check that we are complying with applicable law and regulation, to investigate an alleged crime, or to establish, exercise or defend legal rights. We will only fulfil requests for personal data where we are permitted to do so in accordance with applicable law or regulation.



5. Transfers outside the UK and EEA

We do not transfer the personal data you submit on our Site outside the UK or European Economic Area.

6. How long we keep your personal data

In respect of personal data that we process in connection with animal records, we may retain your personal data for up to five years following departure from the Branch. We may then destroy such files without further notice or liability.

If you apply for a position with us and your application is unsuccessful, we will hold your data on file for a period of 6 months after the end of the relevant recruitment process for consideration for future employment opportunities. At the end of that period, or once you withdraw your consent, your data is deleted or destroyed.

Regarding any other personal data that we process, we will keep that personal data for as long as we need it for the purposes described in this Privacy Notice or as set out in our Branch Data Protection Policy, which is available by contacting the Branch's Head of Operations.

If any personal data is only useful for a short period (e.g. for a specific activity, promotion or marketing campaign), we will not retain it for longer than the period for which it is used by us for the relevant activity.

If you have opted out of receiving marketing communications from us, we will need to retain certain personal data on a suppression list indefinitely so that we know not to send you further marketing communications in the future. We will not use this personal data to send you further marketing unless you subsequently opt back in to receive such marketing.

7. Confidentiality and security of your personal data

We are committed to keeping the personal data you provide to us secure and we have implemented measures to protect the personal data under our control from unauthorised access, improper use or disclosure, unauthorised modification and unlawful destruction or accidental loss. In addition, all our employees and data processors (i.e. those who process your personal data on our behalf) are obliged to respect the confidentiality of the personal data of all users of our Site and those who use or Services.

8. Your rights as a data subject

You have certain rights in relation to the personal data we hold about you. Please note that many data subject rights are not absolute and the extent to which they apply may vary depending on the circumstances and any exemptions that may apply. If you would like to exercise any of these rights, or wish to obtain further information on your rights, please contact us using the details set out in the "About Us" section above.



RSPCA Northamptonshire Branch Registered Charity No. 205377

Vour right of access	If you ask us we will confirm whather we are processing your
Your right of access	If you ask us, we will confirm whether we are processing your personal data and, if so, provide you with a copy of that personal data (along with certain other details). If you require additional copies, we may charge a reasonable fee for producing those additional copies.
Your right to rectification	If the personal data we hold about you is inaccurate or incomplete, you are entitled to have it rectified. If we have shared your personal data with others, we'll let them know about the rectification where possible. If you ask us, where possible and lawful to do so, we will also tell you who we've shared your personal data with so that you can contact them.
Your right to erasure	You can ask us to delete or remove your personal data in some circumstances, such as where we no longer need it or where you withdraw your consent (where applicable). If we have shared your personal data with others, we will let them know about the erasure where possible. If you ask us, where it is possible and lawful for us to do so, we will also tell you who we have shared your personal data with so that you can contact them directly.
Your right to restrict processing	You can ask us to "block" or suppress the processing of your personal data in certain circumstances such as where you contest the accuracy of that personal data or you object to us processing it for a particular purpose. This may not mean that we will stop storing your personal data but, where we do keep it, we will tell you if we remove any restriction that we have placed on your personal data to stop us processing it further. If we've shared your personal data with others, we'll let them know about the restriction where it is possible for us to do so. If you ask us, where it is possible and lawful for us to do so, we'll also tell you who we've shared your personal data with so that you can contact them directly.
Your right to data portability	You have the right, in certain circumstances, to obtain personal data you have provided to us (in a structured, commonly used and machine-readable format) and to reuse it elsewhere or to ask us to transfer it to your chosen third party.
Your right to object	You can ask us to stop processing your personal data, and we will do so, if we are: (i) relying on our own or someone else's legitimate interest to process your personal data, except if we can demonstrate compelling legal grounds for the processing; or (ii) processing your personal data for direct marketing purposes.
Your rights in relation to automated decision-making and profiling	You have the right not to be subject to a decision when it is based on automatic processing, including profiling, if it produces a legal effect or similarly significantly affects you, unless such profiling is necessary for the entering into, or the performance of, a contract between you and us.
Your right to withdraw consent	If we rely on your consent (or explicit consent) as our legal basis for processing your personal data, you have the right to withdraw that consent at any time. You can exercise your right of withdrawal by contacting us using our contact details in the



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	"About Us" section above or by using any other opt-out mechanism we may provide, such as an unsubscribe link in an email.
Your right to lodge a complaint with the supervisory authority	If you have a concern about any aspect of our privacy practices, including the way we have handled your personal data, please contact us using the contact details provided in the "About Us" section above. You can also report any issues or concerns to a national supervisory authority in the Member State of your residence or the place of the alleged infringement.
	You can find a list of contact details for all EU supervisory authorities at http://ec.europa.eu/justice/data-protection/bodies/authorities/index_en.htm .
	As we are incorporated in the UK, our regulatory authority is the Information Commissioner's Office. Contact details can be found on its website at https://ico.org.uk .