



Middle Marches Community Land Trust

Privacy Policy

1. Introduction & Who We Are

Middle Marches Community Land Trust (*'we' or 'us' or 'our'*) gathers and processes your personal information in accordance with this Privacy Policy and in compliance with the relevant data protection regulation,

- the Data Protection Act 2018 (as amended) (“DPA”) and
- the Data Protection, Privacy and Electronic Communications (Amendments etc) (EU Exit) Regulations 2019 No. 419 as amended by the Data Protection, Privacy and Electronic Communications (Amendments etc) (EU Exit) Regulations 2020 (“UK GDPR”), or
- any legislation that amends or replaces it.

For the purpose of the UK GDPR, we are the data controller.

This policy explains how, why and when we collect and process your personal data and provides you with the necessary information regarding your rights.

If you wish to contact Middle Marches CLT, please email info@middlemarchescommunitylandtrust.org.uk.

Your privacy is important to us and we are committed to protecting your personal information.

2. The Personal Information We Collect and Use

For communication purposes, we collect the following personal information when you provide it to us:

- Your full name, email address, postal address and telephone number.
- Our mailing list provider, EmailOctopus, also records your IP address.

The information we process for the purposes listed above is restricted to what is necessary. We take your privacy very seriously and will never disclose, share or sell your data without your consent, unless required to do so by law.

3. Information collected when you sign up for an Event

Personal information collected to manage an Event is retained for the minimum period necessary for the delivery of the Event. If you sign up for one of our Events, we will ask you if you wish to join our mailing.

4. Information collected on the website via Comments

When visitors leave comments on the site, we collect the data shown in the comments form, and also the visitor’s IP address and browser user agent string to help with spam detection.

An anonymised string created from your e-mail address (also called a hash) may be provided to the Gravatar service to see if you are using it. The Gravatar service Privacy Policy is available here: <https://automattic.com/privacy/>. After approval of your comment, your profile picture is visible to the public in the context of your comment.

5. How We Use Your Personal Information

We use the personal information you provide to us to:

- Send you emails about our latest news and upcoming events
- To contact you about other ways to get involved with Middle Marches CLT

6. Reasons We Can Collect and Use Your Personal Information

We rely on Consent (that you have given clear consent for us to process your personal data for a specific purpose) or Legitimate Interests as the lawful bases on which we collect and use your personal data.

7. Your Rights

You have the right to access any personal information that Middle Marches CLT processes about you and to request information about:

- What personal data we hold about you
- The purposes of the processing
- The categories of personal data concerned
- The recipients to whom the personal data has/will be disclosed
- How long we intend to store your personal data for
- If we did not collect the data directly from you, information about the source

If you believe that we hold any incomplete or inaccurate data about you, you have the right to ask us to correct and/or complete the information, and we will strive to update/correct it as quickly as possible; unless there is a valid reason for not doing so, at which point you will be notified.

You also have the right to request erasure of your personal data or to restrict processing in accordance with data protection laws.

If we receive a request from you to exercise any of the above rights, we will ask you to verify your identity before processing the request; this is to ensure your data is protected and secure.

If you exercise your right to be forgotten and request that the data we hold about you be deleted, we will anonymise your information so that it does not personally identify you. This action can only be taken once we are no longer legally required to store the information, i.e., for tax purposes, for processing Gift Aid or other legal obligations relating to financial accounting.

8. Sharing Your Information

8.1 EmailOctopus

We use EmailOctopus, a UK-based company, to store your details and send you our newsletter. Email Octopus is fully compliant with the General Data Protection Regulation (2018); no data are transferred outside of the EU/EEA.

You can read Email Octopus's privacy policy here:

<https://emailoctopus.com/legal/privacy> and find out more about the steps the company has taken to comply with the UK GDPR here:

<https://emailoctopus.com/legal/gdpr>

8.2 Eventbrite

We may use Eventbrite, for the purposes of inviting you to events hosted by Middle Marches CLT. You can find Eventbrite's privacy policy here: <https://www.eventbrite.co.uk/privacypolicy/>

8.3 Give WP, Stripe and PayPal

We use Give WP as our donation portal with Stripe and PayPal as the payment gateways and processors to process and maintain all financial transactions. To learn more about security measures from these organisations, please click on the links below:

Give WP Privacy Policy: <https://givewp.com/privacy-policy/>

Stripe Privacy Policy: <https://stripe.com/gb/privacy/>

PayPal Privacy Policy: <https://www.paypal.com/us/webapps/mpp/ua/privacy-full/>

8.4 Google Analytics and Google Cloud Storage

Our website uses Google Analytics, a web analysis service of Google, Inc., 1600 Amphitheatre Parkway, Mountain View, CA 94043 USA, www.google.com ("Google Analytics" or "Google"). Google Analytics employs cookies that are stored to your computer to facilitate an analysis of your use of the site. The information generated by these cookies, such as time, place and frequency of your visits to our site, including your IP address, is transmitted to Google's location in the US and stored there.

Google Analytics is connected to our website using the plugin Monster Insights. Within this plugin, we have enabled the option to anonymise IP addresses. Your IP address is therefore anonymised before it is transferred from EU/EEA member states. Google uses this information to analyse your use of our site, to compile reports for us on internet activity and to provide other services relating to our website.

Google may also transfer this information to third parties where required to do so by law or where such third parties process this data on Google's behalf. Google states that it will never associate your IP address with other data held by Google. You can prevent cookies from being installed by adjusting the settings on your browser software accordingly. You should be aware, however, that by doing so you may not be able to make full use of all the functions of our website. Please see the section on 'Cookies & Embedded Content' for more information on this.

Google Analytics offers a deactivation add-on for most current browsers that provides you with more control over what data Google can collect on websites you access. The add-on tells the JavaScript (ga.js) used by Google Analytics not to transmit any information about website visits to Google Analytics. However, the browser deactivation add-on offered by Google Analytics does not prevent information from being transmitted to us or to other web analysis services we may engage.

Google Analytics uses electronic images known as web beacons (sometimes called single pixel gifs), and they are used along with cookies to compile aggregated statistics to analyse how our site is used.

You can find additional information on how to install the browser add-on referenced above at the following link: <https://tools.google.com/dlpage/gaoptout?hl=en>. For the cases in which personal data is transferred to the US, Google has self-certified pursuant to the EU-US Privacy Shield (<https://www.privacyshield.gov/EU-US-Framework>).

MMCLT uses Google Drive's cloud file-hosting service, which allows users to store files in the cloud and share files. Google Drive's Privacy Policy is available here: <https://support.google.com/drive/answer/10375054?hl=en>

8.5 Other

The third-party service providers Middle Marches CLT uses may be updated from time to time as our business needs and legal requirements change.

Visitor comments may be checked through an automated spam detection service.

9. Keeping Your Personal Information Secure

We have appropriate security measures in place to prevent personal information from being accidentally lost, used or accessed in an unauthorised way. We limit access to your personal information to those who have a genuine business need to know it. Those processing your information will do so only in an authorised manner and are subject to a duty of confidentiality.

If there is a need to dispose of your information, hard copies are shredded, and soft copies are permanently deleted.

10. Cookies & Embedded Content

Middle Marches CLT's website makes use of cookies to save and retrieve information about your visit to our sites. Cookies are small files of software which save and retrieve information about your visit to a website or application. They reside in your internet browser to help remember your preferences and previous activity. You can find more information about cookies at:

www.allaboutcookies.org and www.youronlinechoices.eu.

Cookies currently used on our site identify you as an anonymised number. We and our partners (e.g., marketing partners, affiliates, or analytics providers) use cookies and log

files to analyse trends, administer the website, track users' movements around the website, and gather demographic information about our user base. We may receive anonymised reports based on the use of these technologies by our partners on an aggregated basis. We also use this data to provide the site's content, ensure the functionality of our information technology systems, and optimise our website. The legal basis for this processing is Article 6(1)(f) UK GDPR. The data from log files will be stored separately from your other personal data.

Users can control and refuse the use of cookies at the individual browser level. Cookies installed can be deleted. If you have visited our website in the past and would like to make changes to your cookie preferences, please first clear the cookies from your browser and then update your cookie preferences. If you reject cookies, you may still use our website, but your ability to use some features or areas of our website may be limited.

When you visit our website, the following categories of cookies will be set in your browser:

10.1 Strictly necessary cookies

These cookies are essential to enable you to move around a site and use its features. Without these cookies, the services you have asked for cannot be provided.

- Registered Visitor Cookie – A unique identifier given to each registered user, used to recognise you anonymously through your visit and when you return to the site.

10.2 Performance cookies

These cookies collect information so that we can analyse how our visitors use our site. These cookies do not collect information that identifies you. All information these cookies collect is anonymous and is only used to improve how our site works.

10.3 Functional cookies

These cookies allow websites and applications to remember choices you make (e.g., such as your name if you leave a comment on the website) and provide enhanced, more personal features.

These cookies cannot track your browsing activity on other websites. They do not gather any information about you that could be used for advertising or to record where you've been on the Internet outside of our site.

10.4 Targeting cookies

To keep our website services relevant, easy to use and up to date, we use web analytics services to help us understand how people use the site.

Cookies allow web analytics services to recognise your browser or device and, for example, identify whether you have visited our website before, what you have previously viewed or clicked on, and how you found us. The information is anonymous

and only used for statistical purposes, and it helps us to analyse patterns of user activity and to develop a better user experience.

10.5 Embedded content from other websites

Articles on this site may include embedded content (e.g. videos, images, articles). Embedded content from other websites behaves in the exact same way as if the visitor had visited the other website.

These websites may collect data about you, use cookies, embed additional third-party tracking, and monitor your interaction with that embedded content, including tracking your interaction with the embedded content if you have an account and are logged in to that website.

11. How Long We Keep Your Data

We retain your information in line with our Data Retention Policy. For more information, please [get in touch at info@middlemarchescommunitylandtrust.org.uk](mailto:info@middlemarchescommunitylandtrust.org.uk).

If you leave a comment, the comment and its metadata are retained indefinitely. This is so that we can recognise and approve any follow-up comments automatically instead of holding them in a moderation queue.

12. Lodging A Complaint

We only process your personal information in compliance with this Privacy Policy and in accordance with the relevant data protection laws. If, however, you wish to raise a complaint regarding the processing of your personal data or are unsatisfied with how we have handled your information, please contact us at info@middlemarchescommunitylandtrust.org.uk.

Alternatively, you have the right to lodge a complaint with the supervisory authority at the following address:

Information Commissioner's Office (ICO)

Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

For more information on lodging a complaint with the ICO, please visit <https://ico.org.uk/make-a-complaint/>.

This policy will be reviewed annually or sooner if there are significant changes to legislation or MMCLT activities.