



Privacy Policy

Privacy statement

Sylva Foundation ('we/us/our') promises to respect any personal data shared with us, or that we get from other organisations, and keep it safe. We aim to be clear when we collect data and not do anything a customer wouldn't reasonably expect.

Developing a better understanding of our customers through their personal data allows us make better decisions, fundraise more efficiently and, ultimately, helps us to deliver our charitable work. We regularly review this policy to ensure it meets our legal and statutory obligations, and that it's appropriate for our customers.

Our Privacy Policy is presented to our customers via user-friendly 'Privacy Notices', and these are made available online. This Privacy Policy, together with supporting documents, is available on request.

Organisation information

- Sylva Foundation is a charity registered in England and Wales 1128516 and in Scotland SC041892
- Registered address: Sylva Wood Centre, Little Wittenham Road, Long Wittenham, Oxfordshire, OX14 4QT, UK
- Sylva Foundation is registered with the Information Commissioner's Office (ICO). Our Registration Number is **Z1773491**
- URL address: www.sylva.org.uk

Data controller

- Sylva Foundation is the Data Controller, meaning the body which determines the purposes and means of processing personal data.
- Sylva Foundation will appoint a Data Protection Officer (DPO), who responsibility is to oversee the relationship between the organisation's employees and the public, specifically the processing of any personal information held by the organisation. In accordance of Article 37(5) of the General Data Protection regulations (GDPR), the main roles for the DPO are:
 - Informing and advising the controller or the processor and their employees of their data protection obligations.
 - Monitoring compliance with the Regulation, including the assignment of responsibilities.
 - Awareness-raising and training of staff involved.
 - Providing advice, where requested, in conducting Data Protection Impact Assessments (DPIAs), and monitoring compliance and performance.
 - Engaging with the Information Commissioner's Office or relevant Supervisory Authority.
- The DPO also acts as the person that data protection queries are directed to. Sylva Foundation's DPO can be contacted at the organisation's registered address or by email: dpo@sylva.org.uk

Data processors

- Sylva Foundation may rely upon individuals, agencies, companies, or others, to process personal data on its behalf (*i.e.* on behalf of the data controller). Current examples include:
 - certain HR services (employees' salaries and PAYE);
 - collection of online payments (*e.g.* PayPal, CharityCheckout, CiviCRM, Stripe);
 - website statistics (via Google analytics).

Website hosting and data location

- Our website hosting provider is Digital Ocean.
- The website is located in the UK.
- The data is located in the UK.

Users of our website and other channels

- Sylva Foundation's main website is www.sylva.org.uk
- A number of other discrete websites are available as sub-domains. Current examples include:
 - myForest: www.sylva.org.uk/myforest
- Other channels are available (both permanent or temporary). Examples include:
 - mobile app: *Deer Manager*
 - online survey: *British Woodlands Survey*
- Our websites and channels are directed at a wide audience, ranging from members of the public, to businesses, schools and young people.
- All websites and channels are accessible by people under 16-years-old.

Information collected

- **Registration information** is collected for certain websites/channels. This may include personal information (e.g. name, address, email), plus information about a business or property (e.g. name, location, size).
- **Activity information** is collected. Examples include:
 - Payment information (e.g. a record of payments, but note all payment processing is undertaken by external data processors)
 - Demographic information (e.g. activities, roles, location, interaction with Sylva Foundation events, donation record)
 - Human Resources information for trustees, staff, tenants and volunteers (e.g. name, address, date of birth, next of kin).
 - 'My Account' settings are provided for one website currently (www.sylva.org.uk/myforest). Users are able to change privacy settings (e.g. to select to opt-in or opt-out to certain services and communications), and in some cases to opt-in to share data with third parties.
- **Automatically-collected information** is collected, including device information, IP address, site visited before arriving, browser type or operating system.
- **Cookie technology** is employed to support the delivery of our services. A Cookie notice will be displayed on www.sylva.org.uk and any subdomains for all first-time users, and we provide a screen to allow personalisation. We make clear the three different types of Cookies: *Strictly Necessary*, *Functional*, and *Performance*, and offer options to turn off these where possible. We will also provide a 'Find out more' page to explain more about Cookies and their use by Sylva Foundation.

Outbound communications with registered users

- email: Sylva Foundation employees may use email to communicate with registered users, particularly in response to enquiries. For small groups of users, for example people registered for an event, group email may also be used. In all cases they will be contacted using the *bcc* field to avoid the sharing of personal email addresses with other individuals.
- customer relationship management (CRM): Sylva Foundation uses the open source system CiviCRM to manage its customer data. We use tools built into CiviCRM to handle bulk communications. Communication options are provided with every such communication (e.g. options to opt-out of future communications).
- telephone: this option is most often used to respond to specific queries by registered users. Sylva Foundation does not undertake telephone marketing or fundraising.

Site security measures

- Sylva Foundation websites comply with the government-backed (via the National Cyber Security Centre) scheme 'Cyber Essentials' and is certified annually: Certificate no. 1630112422783529

Disclosures

- Privacy Notices are designed as outward-facing user-friendly notices for users of our websites and channels, providing clear disclosure about information held, external links, data sharing, and whether any information is shared by Sylva Foundation. Currently, separate Privacy Notices are provided for:
 - Sylva Foundation: www.sylva.org.uk
 - myForest: www.sylva.org.uk/myforest
- No individual and identifiable information is shared by Sylva Foundation with third parties without specific consent being granted by the user. Where such an option exists, the default is to be opted-out, while the option to opt-in is provided on an Account dashboard.
- If consent is granted, information will be shared only with those third parties described for the purposes clearly laid out. Current/recent examples include:
 - Sharing information, including location and cull counts, with the Deer Initiative (myForest and Deer Manager app);
 - Sharing information, including name and email, with a sponsor of a raffle prize.
- Privacy information is provided at www.sylva.org.uk/privacy

Rights and choices

- Users of websites with an account can edit preferences for how their data is shared with any third parties, and communication preferences. They can also choose to delete their account.
- Individuals can contact Sylva Foundation to request that data is corrected or erased, if this option is not provided via an Account dashboard.
- Users can opt-out of communications. The option is included with all communication (e.g. in the footer of an email generated by CiviCRM). Any current or future website with an Account dashboard will include a separate option to opt-in/opt-out of communications.
- Data will be held for up to three years after a specific account is deleted.

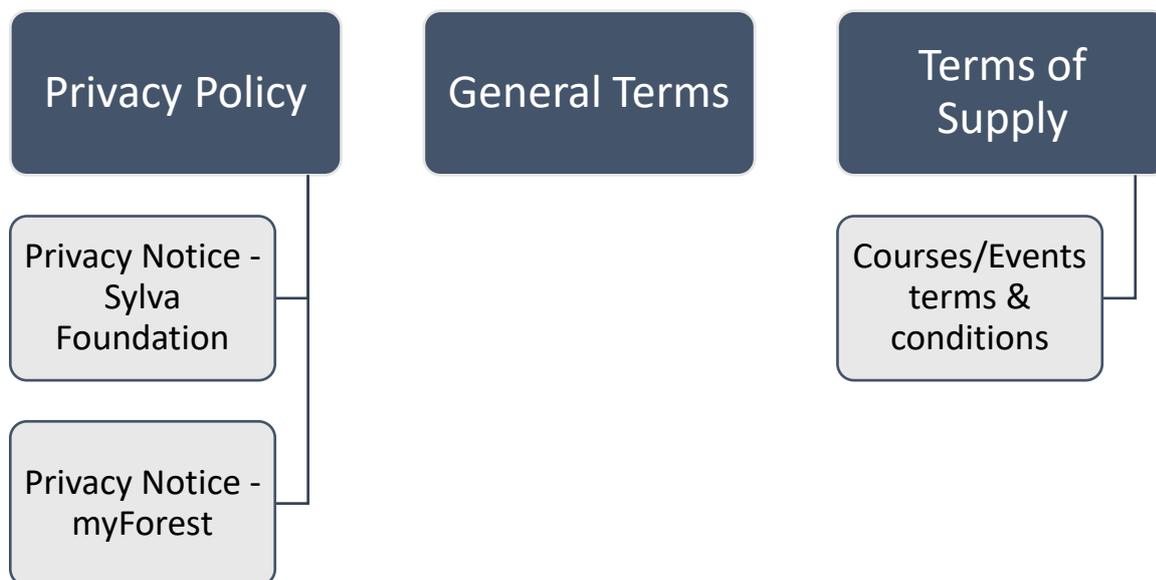
Changes to this Privacy Policy

- Sylva Foundation's Privacy Policy will be reviewed regularly (at a minimum annually).
- Changes to the Privacy Policy will always be reflected in our Privacy Notices. Any changes to Privacy Notices will be highlighted to users, and a link provided to the revised Privacy Policy.
- User consent is collected and stored on Sylva Foundation's installation of CiviCRM.

Contact us

- Contact the Data Protection Officer (DPO): currently Chief Executive, Gabriel Hemery.
- by email: dpo@sylva.org.uk
- by telephone: 01865 408018
- by post: Sylva Foundation, Sylva Wood Centre, Little Wittenham Road, Long Wittenham, Oxfordshire, OX14 4QT, UK
- You have the right to report a concern with the Information Commissioner's Office (ICO): www.ico.org.uk/concerns

Sylva Foundation – data protection and management documents



Additional documents/procedures:

- Registration with the Information Commissioner's Office (No: Z1773491)
- Site security certificate with Cyber Essentials No. 1630112422783529
- Cookies Policy (available online)
- Information Security Policy (internal document)
- Data Protection Impact Assessment template (provided to Sylva Foundation employees)
- Data and Information map (internal document detailing data origins and relationships)