



The Carnivorous Plant Society

Privacy Policy

Initial version – 25th June 2022

Introduction

The Carnivorous Plant Society is committed to proper management of personal data and to compliance with all applicable privacy regulations.

This Privacy Policy tells you what to expect us to do with your personal information when you join the Society, make contact with us, or use one of our services.

Contact details

The Carnivorous Plant Society is a charitable unincorporated association. The trustees of the Society are the joint controllers for the personal information we process, unless otherwise stated.

There are several ways you can contact us, including by email, via our website, through social media or by post.

Our postal address is:

The Secretary
The Carnivorous Plant Society
29 Hollins Gardens
Glossop
Derbyshire
SK13 0EF
United Kingdom

For general enquiries, please email enquiries@thecps.org.uk.

If you are contacting us to exercise your rights under privacy law, please help us to handle this appropriately by putting '**Data Protection**' in the subject line of your message or at the top of your letter.

Your rights

You have rights under privacy law. The rights available to you depend on our reason for processing your information. You can read more about these rights here:

<https://ico.org.uk/your-data-matters>

If you contact us to exercise these rights, in general we have **one month** to respond to your request.

Information

You have the right to be informed about our use of your personal data. We use **this document** to give you that information.

Access

You **always** have the right to ask us for a copy of your personal information. There are a few exemptions, so you might not always receive all the information we hold.

Rectification

You **always** have the right to ask us to correct information you think is inaccurate or incomplete.

Erasure

In **some circumstances** you have the right to ask us to erase your personal information.

Restriction of processing

In **some circumstances** you have the right to ask us to restrict the processing of your information.

Objection to processing

If we are processing your information based on our **legitimate interest** you have the right to object to this.

Portability

In **some circumstances** you have the right to ask us to transfer the information you gave us to another organisation or to you, using a machine-readable format. This is slightly different to your right of access described above.

How we get personal information

Most of the personal information we process is provided to us directly by you for one of the following reasons:

- You have applied to join the Society
- You wish to attend, or have attended, a Society event
- You have contacted us with an enquiry
- You have joined or posted on our social media groups / pages
- You have joined or posted on the CPUK Forum
- You have purchased items from our website, including seedbank orders
- You have donated seeds to our seedbank

We may also receive information indirectly, in the following circumstances:

- An organisation that applies to join or is an existing member of the Society nominates you to act as its representative
- A complainant or witness refers to you in connection with a complaint or report under our Anti-Bullying and Harassment Policy
- You volunteer for a role with the Society that requires us to request a Disclosure and Barring Service check (e.g. for activities involving schools)

When you visit our website or the CPUK Forum we may automatically collect some information about your visit and your device. Further information about this is provided in the next section.

Sharing your personal information

We will never sell your information and we will not share your information with anyone for use in direct marketing.

We use third party data processors who provide elements of services for us. We have contracts in place with our data processors. This means that they cannot do anything with your personal information unless we have instructed them to do it. They will not share your personal information with any other organisation (except us). They will hold it securely and retain it for the period we instruct.

In some circumstances we are legally obliged to share information, for example with regulatory authorities or if we are subject to a court order. In these situations, we will satisfy ourselves that we have a lawful basis for sharing the information and we will document our decision-making.

What personal information we process and why

Membership information

When you apply to join the Society we collect the following personal information:

- Full name and title
- Postal address
- Phone number
- Email address
- Application (joining) date
- Type of membership
- Payment method
- Whether you are over the age of 18
- The amount of any optional donation
- Whether you want us to collect Gift Aid on your membership fee and on any donations you make

We use this information to administer your membership, to provide your membership benefits, and to contact you about important Society business such as Annual General Meetings.

Our lawful basis for processing this information is that it is necessary for a **contract** you have with the Society (your membership).

If you indicate that you want us to collect Gift Aid, we will also use the information provided to comply with our relevant **legal obligations** (e.g. HMRC record-keeping and reporting).

We use a third party processor, Membermojo, for membership administration (including facilitating payment through third party processors, see below). You can read more about how Membermojo handles your data on our behalf here:

<https://membermojo.co.uk/thecps/help/privacy>

We use third party processors, Paypal and Stripe, to take payments for membership. Paypal and Stripe may also act as Data Controllers in maintaining your accounts on their platforms and providing other services which you may use, whether or not in connection with the Society. You can read more about how they handle your data here:

- Paypal: <https://www.paypal.com/myaccount/privacy/privacyhub>
- Stripe: <https://stripe.com/en-gb/privacy-center/legal>

We use a third party processor, Mailchimp (part of Intuit), to send email communications to members, for example to distribute the newsletter and to give notice of Society events. You can read more about how Mailchimp handles your data on our behalf here:

- <https://www.intuit.com/privacy/statement/>
- <https://mailchimp.com/en-gb/legal/data-processing-addendum/>

All mail sent via Mailchimp includes an unsubscribe link. Please note that if you unsubscribe via this link, you may no longer receive important updates from the Society such as notice of General Meetings.

We keep membership information for the duration of your membership plus 12 months, or for the duration of your membership plus 7 years (or 7 years after your last donation) if you ask us to collect Gift Aid on your membership subscription and any donations.

Event information

If you register to attend one of our events, you may be asked to provide the following information:

- Contact information
- Information about your dietary requirements, if the event has catering
- Information about access provisions you may need
- Payment information, if there is a charge for attendance

We use this information to administer the event (including responding to confirm whether you have been granted a place) and to provide you with an acceptable service.

Our lawful basis for processing this information is **your consent**.

If you provide information about dietary or access requirements, this information may be special category data under the UK GDPR. The condition under which we process this information is **your explicit consent**.

You have the right to withdraw this consent at any time. If you want to withdraw your consent, please email us at enquiries@thecps.org.uk and we will update our records as soon as possible to reflect your wishes.

We use a third party processor, Eventbrite, to manage bookings for some events. You can read more about how they handle your data here:

https://www.eventbrite.co.uk/support/articles/en_US/Troubleshooting/eventbrite-privacy-policy

We keep events information for 60 days after the event to allow for any queries arising afterward, such as lost property.

Sometimes we may advertise an event that is organised by a third party, for example shows or open days run by other institutions or by independent or commercial growers. We will make it clear when this applies. In those cases, the event organiser (not the

Society) is the data controller and you should consult their privacy policy before sharing your personal information with them.

Enquiries

When you contact the Society with an enquiry we collect the following personal information:

- Contact information such as your email address and phone number
- Information you provide to us either in your initial enquiry or in subsequent correspondence

We use this information to deal with your enquiry and to provide you with an acceptable response.

Our lawful basis for processing this information is our **legitimate interest**. We assess that you would reasonably expect us to process your information in order to respond to your enquiry and that it is necessary and proportionate for us to do so. You have the right to object to this processing.

We will not ask for or intentionally collect sensitive (special category) information, but if you volunteer information of this type in the course of our correspondence then we will consider you to have given **your consent** to our processing of the information. You have the right to withdraw this consent at any time. If you want to withdraw your consent, please email us at enquiries@thecps.org.uk and we will update our records as soon as possible to reflect your wishes.

We use a third party processor, Microsoft 365, to manage various aspects of the Society's operations, including email. You can read more about how Microsoft handles your data on our behalf here: <https://privacy.microsoft.com/en-gb/privacystatement>

We keep general enquiries information for 2 years after the enquiry is resolved, to allow for follow-up enquiries related to the same matter. If your enquiry relates to issues that could give rise to a legal claim, regulatory action or similar then we may retain the information indefinitely.

Social media

The Society maintains a presence on social media platforms, including Facebook, Twitter and Instagram. When you join, post or interact with the Society's groups, pages and posts, we may receive the following information:

- Basic information from your profile such as your name and profile picture
- Any content that you post, including comments and reactions

We use this information to respond to your queries and comments, to gauge sentiment about the Society's activities, and to promote the Society's objects. Where your social

media privacy choices allow, we may share or re-post (e.g. retweet) posts you make to our social media channels.

Which information we receive from your profile will depend on the choices you have made in the relevant platform's privacy settings. It's a good idea to check these regularly. If you have any queries about your privacy choices you should raise these with the relevant social media platform. You can find some helpful guidance about social media privacy from the Information Commissioner's Office, here:

<https://ico.org.uk/for-the-public/online/social-media-privacy-settings/>

Our lawful basis for processing this information is our **legitimate interest**. We assess that you would reasonably expect us to process information you share with us via social media in this way. You have the right to object to our processing of this information at any time. If you want to object, please contact us by direct message or via enquiries@thecps.org.uk and we will do our best to comply with your wishes.

Social media platforms are likely to be acting as data controllers when you use their services, including when you interact with Society groups, pages and posts. You should familiarise yourself with the privacy policy of each platform before using it.

In most cases, when you post, comment or react on social media platforms you are permanently publishing this information to the general public. We cannot control who can view or download content you publish on social media. You can delete posts, comments or reactions at any time but this does not guarantee to erase any copies that others may have made while the information was public.

If you use a social media platform's privacy options to restrict or block our access to your profile or content, and you subsequently mention or tag us in a comment or post, we may still have access to that comment / post and to the personal information that goes with it.

CPUK Forum

Joining the CPUK Forum

If you join the CPUK forum we will collect the following information:

- Display name
- Email address
- Password
- Gender (if you choose to enter it)
- Location (as entered by you)
- Your acceptance of the terms and conditions

We use this information to administer your forum profile, to identify you when you post or otherwise interact with the site, and to contact you with forum notifications. You can choose to add further information to your profile if you wish.

We also use a CAPTCHA service provided by Google (reCAPTCHA) to verify that a real person is creating the account, to reduce abuse of the forum by spammers. We do not store or process any data created via the CAPTCHA service after your account is setup.

Our lawful basis for processing this information is **your consent**. You have the right to withdraw this consent at any time. If you want to withdraw your consent, please email us at enquiries@thecps.org.uk and we will update our records as soon as possible to reflect your wishes.

We keep this information for as long as your account exists.

Logging in to the CPUK Forum

When you log in to the CPUK forum we will automatically collect your IP address, device type, browser details, login method and timezone. The forum software also uses your IP address to infer an approximate geographical location (e.g. to the nearest major city). We use this information to detect and prevent abuse of the site (e.g. by spammers). If you contact us about technical issues with the CPUK forum, we may also use your device type and browser information to help troubleshoot the problem.

Our lawful basis for processing this information is our **legitimate interest**. We assess that you would reasonably expect us to collect this information, that it is necessary to protect the site and the community from abuse and is proportionate to that purpose, and that our interest in doing so outweighs your individual right to withhold this information. You have the right to object to this processing, but because of the nature of these controls, it is not technically feasible to offer an individual opt-out. If you object to us collecting and processing your data in this way, please do not create an account or login to the CPUK Forum.

We keep the most recent version of this information for each of your devices for as long as your account exists. Each time you login with a given device any information about previous logins from that device is overwritten.

Cookies

If you select 'Remember me' when logging in, we will also store a cookie (a small text file) on your device that is used to identify you and automatically log you in when you return to the site. You can delete this cookie via your browser settings at any time, and you can disable automatic login by un-checking the 'Remember me' option at login.

Forum content

When you post content to the CPUK Forum or otherwise interact with forum content (e.g. by quoting or reacting to other users' posts) you are permanently publishing this information to the general public. We cannot control who can view or download content you publish on the site. You can delete content you have posted to the CPUK Forum at any time and this will permanently remove it from our servers, but this does not guarantee to erase any copies that may have been taken by others.

Purchases (including Seedbank orders)

When you purchase items from our website we will collect the following information:

- Contact information
- Which items you have ordered and how many of each
- Delivery and billing address(es)
- Payment information (if applicable)

We use this information to process and fulfil your order and to keep you informed about its progress.

Our lawful basis for processing this information is that it is necessary for a **contract** you have with the Society (your order).

We use a third party processor, WooCommerce, to receive and process orders via our website, and we use Paypal and Stripe to take payments. You can read more about how they handle your data here:

- WooCommerce: <https://woocommerce.com/documentation/get-help/woocommerce-com/privacy/>
- Paypal: <https://www.paypal.com/myaccount/privacy/privacyhub>
- Stripe: <https://stripe.com/en-gb/privacy-center/legal>

We keep transaction details for 7 years to comply with regulatory requirements.

Seedbank donations

When you donate seeds to the seedbank we collect the following information:

- Your name
- Contact information
- Information about the seeds you have donated including species / hybrid / variety and location details and the (approximate) quantity of each type
- Date of your donation
- Phytosanitary details if applicable

We use this information to add your donation to the seedbank and to comply with phytosanitary regulations.

Our lawful basis for processing this information is our **legitimate interest** and to comply with our **legal obligations**. Where data is processed on the basis of our legitimate interest we assess that you would reasonably expect us to process your information in this way and that it is necessary for the proper administration of the seedbank. You have the right to object to this processing, and if you do so we will stop processing your seedbank donation information. Unfortunately this may prevent us

from accepting seed donations from you and we may have to remove from the seedbank any seed you previously donated.

We keep seedbank donation information for 5 years after the last seed from your donation leaves the seedbank, to allow us to comply with regulatory requirements for plant material we export (where applicable).

Nominated representatives

If you are nominated as the representative of an organisation that joins or is an existing member of the Society, we will collect the following information (which may be provided to us by your organisation):

- Full name and title
- Postal address
- Phone number
- Email address
- Which organisation you represent
- Your role at the organisation you represent
- Nomination date

We use this information to administer your organisation's membership, to provide your organisation's membership benefits (where applicable), and to contact your organisation about important Society business such as Annual General Meetings.

Our lawful basis for processing this information is our **legitimate interest**. We assess that you would reasonably expect us to process your information in this way and that it is necessary and proportionate to properly administer your organisation's membership of the Society. You have the right to object to this processing, but this will affect our ability to administer your organisation's membership. It would be helpful to discuss your objection with your organisation in the first instance – for example, to give them the opportunity to nominate someone else.

We use a third party processor, Membermojo, for membership administration including nominated representatives. You can read more about how Membermojo handles your data on our behalf here: <https://membermojo.co.uk/thecps/help/privacy>

We retain this information until your organisation either leaves the Society or nominates a new representative.

Anti-Bullying and Harassment reports

When we receive a complaint or witness report of alleged bullying or harassment, and during any subsequent investigation, we may collect the following information:

- Names of the alleged victim and perpetrator and of any witnesses
- Details of what is alleged to have occurred, where and when

- Statements given by the complainant or reporter, by any witnesses, and by the alleged perpetrator
- Any evidence presented by anyone involved in the complaint or report, which may include photos, video, correspondence, messages, social media posts etc.
- Our investigation report and findings
- Any action taken as a result of the findings

We use this information to identify and investigate potential incidences of bullying or harassment and to take appropriate action.

Our lawful basis for processing this information is our **legitimate interest**. We assess that it is necessary and proportionate to uphold the Society's Anti-Bullying and Harassment Policy. You have the right to object to this processing, but in some situations we may decide that we have compelling legitimate grounds to continue processing anyway.

We use a third party processor, Microsoft 365, to manage various aspects of the Society's operations, including email (Exchange Online) and document management (SharePoint). Information relating to complaints and reports under the Anti-Bullying and Harassment Policy is stored in SharePoint and is subject to strict access controls. You can read more about how Microsoft handles your data on our behalf here: <https://privacy.microsoft.com/en-gb/privacystatement>

Where we conclude (following an investigation) that bullying or harassment is likely to have occurred, we will retain all information relating to the investigation (including details of any action taken as a result) indefinitely.

If we are unable to substantiate allegations of bullying or harassment and take no further action, the investigation report **only** will be retained indefinitely; other information collected in the course of the investigation will be deleted once the investigation concludes.

Disclosure and Barring Service checks

If you volunteer for a role with the society that will involve significant contact with children or vulnerable adults (for example, educational activities carried out in schools) we may be required to conduct a Disclosure and Barring Service (DBS) check.

Depending on the type of check conducted, we may collect:

- Information about unspent convictions
- Information about spent convictions, reprimands, cautions and final warnings
- Other information that may be relevant such as whether you are on a list of people barred from working with children or vulnerable adults

We use this information to comply with our obligations to safeguard children and vulnerable adults.

Criminal offence data is 'special category data' under the UK GDPR. Our lawful basis for processing this information is **your explicit consent**.

We use a third party processor, Microsoft 365, to manage various aspects of the Society's operations, including email (Exchange Online) and document management (SharePoint). Information relating to DBS checks is stored in SharePoint and is subject to strict access controls. You can read more about how Microsoft handles your data on our behalf here: <https://privacy.microsoft.com/en-gb/privacystatement>

We will keep DBS check details until 6 months after the start of the initial activity for which the check was carried out. After this, we will retain indefinitely:

- information about what type of check was performed and
- whether we allowed you to participate in the activity.

Jurisdiction

This Privacy Policy shall be governed by and construed in accordance with the laws of England and Wales. Disputes arising in connection with this Privacy Policy shall be subject to the exclusive jurisdiction of the courts of England and Wales.

Updates to this policy

We keep this policy under regular review to ensure it is complete and accurate. We will update it whenever there is a significant change to our personal information handling arrangements. The latest version will always be available on our website, but we will also send you a copy if you ask.