



Malvern Hills Trust privacy policy – members of the public and third parties

Malvern Hills Trust (MHT) treats the privacy of members of the public and website users very seriously and takes appropriate security measures to safeguard their privacy. This Policy explains how MHT protects and manages any personal information (data)* shared with it and that it holds, including how MHT processes and protects that data.

Readers of this policy are also referred to MHT's 'Data Protection Statement'.

** Personal information (data) means any information that may be used to identify an individual, including, but not limited to, a first and last name, a home or other physical address, email address or other contact information.*

How MHT uses personal information

This privacy policy tells members of the public what to expect when MHT collects personal data. It applies to information MHT collects about:

1. Visitors to MHT's website,
2. E newsletter recipients,
3. People who contact MHT via social media,
4. People who email MHT,
5. People who make a complaint to MHT,
6. People buying car park passes,
7. Easement applicants,
8. People applying for fishing permits,
9. People attending events,
10. People submitting tenders,
11. Breaches of byelaws,
12. People who commit parking offences,
13. Members of other organisations working with MHT,
14. Neighbours making enquiries relating to land and property,
15. Members of the public speaking at MHT Board meetings.

1. Visitors to MHT's website

Two cookies are in use on the site www.malvern hills.org.uk

One is for Google Analytics which stores the user's activity but nothing unique about the user themselves on the site. This data is transmitted via the Secure Socket Layer (SSL) technology and stored with Google.

The second cookie only affects those who log in to the administration section of the website (the website editors themselves). This cookie stores some information on the machine to tell the website that the user is authorised to log in to the backoffice. No personal data is kept in this cookie apart from the username of the user logged in.

2. E-newsletter

MHT uses a third party provider V8 Media to deliver e-newsletters. The email addresses of all subscribers to the newsletter are kept secure via MD5 hashing within a database. For people wishing to unsubscribe their information can easily be removed, on request.

3. People who contact MHT via social media

MHT manages its social media interactions in house, using Facebook and Twitter.

Private or direct messages received via social media will be securely stored by MHT for three months. They will not be shared with any other organisations.

4. People who email MHT

Emails are passed through a secure spam filtering system at eSterling and are held on MHT's secure server. MHT does not share personal email addresses with anyone outside MHT without the specific consent of the sender of the email.

MHT will monitor any emails sent to it, including file attachments, for viruses or malicious software. Please be aware that members of the public have a responsibility to ensure that any email sent to MHT is within the bounds of the law.

5. People who make a complaint to MHT

When MHT receives a complaint from a person it makes a written record of the details of the complaint, including the name, address and contact details of the complainant. MHT only uses the information supplied to it to deal with the complaint. The records are stored in a locked facility on MHT's premises.

MHT keeps personal information contained in complaint files in line with its retention policy. This means that information relating to a complaint is retained for two years from closure. It is retained in a locked facility and access to it is restricted to MHT staff and trustees only according to the 'need to know' principle.

6. People buying car park passes

The following details are collected when people apply for a car parking pass:

- Name
- Address
- Vehicle registration number
- Email address (annual passes only)
- Pass number

These details are stored on an in-house database, access to which is password controlled. The details are kept for one year following the expiry of the pass, after which they are deleted. The details are not shared with anybody else.

The email addresses are used to send out reminders to renew annual passes only.

7. Easement applicants

People applying for an easement are required to complete an application form and submit it to the office. The details are securely stored in paper form and digitally.

The information on the form will be shared with MHT's legal advisors, land agents or other professional advisors if the application is successful, in order to process the application.

8. People applying for fishing permit

People applying for a fishing permit are required to complete a form and bring it into MHT's office. The completed forms are stored in a locked facility. Details of permits issued are stored on a database and retained for one year after the permit expires.

The personal data from the form would only be shared with law enforcement authorities in the event of a breach of MHT's byelaws or the law.

9. People attending events

MHT runs a number of free to attend events each year. The details (name and contact number) of people booking a place on an event are recorded on a written sheet and kept in a file in a secure cabinet on MHT premises. They will be destroyed within 3 months of the event.

10. People submitting tenders

MHT has tendering guidelines in place for contracts with a value in excess of £10,000. Details of all the tenders submitted are held on file in a locked facility until the completion of the audit for the financial year in which the tendering exercise took place.

11. Breaches of byelaws

When a person is in breach of MHT's byelaws, they will receive written notification of the breach and details of MHT's actions in connection with the breach. Personal details and information on the breach may need to be shared with law enforcement agencies and MHT's lawyers.

Information on all breaches is securely stored in perpetuity.

12. Parking offences

People parking in breach of MHT's byelaws are issued with a parking charge notice. The vehicle registration number will be sent to the DVLA to trace the owner of the vehicle. The details obtained will be used to contact the owner of the vehicle to obtain payment of the parking charge. MHT is required to comply with the DVLA's regulations and is subject to regular inspections from the DVLA. Information received from the DVLA must be deleted after 2 years.

MHT may share the information received from the DVLA with legal advisors or debt collection agencies in the event of non-payment of the charges.

13. Members of other organisations

MHT works with a number of local organisations. Personal details of representatives from those organisations will be held in order to communicate, share information and set up meetings. These details will not be shared with anyone else and will be deleted when the individual and/or organisation is no longer involved with MHT.

14. Neighbours making enquiries relating to their land or property

With 3,000 acres of land under its custody, MHT receives many queries from neighbours such as easement and boundary queries. MHT stores all correspondence relating to neighbouring properties in a locked facility on MHT's premises. Correspondence is kept in perpetuity, to provide a permanent record of decisions reached and agreements made.

15. Members of the public speaking at MHT Board and Committee meetings

Members of the public occasionally ask to speak at MHT Board and Committee meetings. The minutes of those meetings will record the names of these people. MHT's Board minutes are made available to the public under the Local Government Act 1972 part 5A. Confidential minutes are not made available to the public but are made available to all trustees.

Complaints or queries under the GDPR

MHT tries to meet the highest standards when collecting and using personal information. For this reason, MHT takes any complaints received about this very seriously. MHT encourages people to bring it to their attention if they think that MHT's collection or use of information is unfair, misleading or inappropriate.

This privacy notice was drafted with brevity and clarity in mind. It does not provide exhaustive detail of all aspects of MHT's collection and use of personal information. However, MHT is happy

to provide any additional information or explanation needed. Any requests for this should be sent to the address below.

If a member of the public wishes to make a complaint about the way MHT has processed their personal information, they can contact the ICO as the statutory body which oversees data protection law.

www.ICO.org.uk/concerns.

Access to personal information

MHT tries to be as open as it can be in terms of giving people access to their personal information. Individuals can find out if MHT holds any personal information by making a 'subject access request' under the GDPR. If MHT does hold information about an individual MHT will:

- give the individual a description of it;
- tell the individual why MHT is holding it;
- tell the individual who it could be disclosed to; and
- let the individual have a copy of the information in an intelligible form.

To make a request to MHT for any personal information please put the request in writing to the address provided below.

If the individual agrees, MHT will try to deal with their request informally, for example by providing them with the specific information requested over the telephone.

If MHT does hold information about an individual, s/he can ask MHT to correct any mistakes by contacting the address below.

Links to other websites

This privacy notice does not cover the links within this site linking to other websites. MHT encourages members of the public to read the privacy statements on the other websites visited and for users of social media, those of Facebook and Twitter.

Changes to this privacy policy

MHT keeps its privacy policy under regular review. This privacy policy was last updated on 14th January 2020.

How to contact MHT

To request information about MHT's privacy policy email info@malvernhills.org.uk or write to:

Malvern Hills Trust
Manor House, Grange Road
Malvern WR14 3EY