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OSS Privacy Policy

The Open Spaces Society (OSS) is committed to protecting and respecting the privacy of its members and supporters. You can be assured that we will never sell your data or share it with anyone outside the society. You can change your mailing preferences at any time either by visiting your [online account](#), by emailing us at office1@oss.org.uk, by phoning 01491 573535, or by post to 25a Bell Street, Henley-on-Thames RG9 2BA.

This policy explains why we collect information from you, what information we need, how we use it and how we keep it safe.

1. Background

1.1 What is General Data Protection Regulation (GDPR)?

General Data Protection Regulation (GDPR) (Regulation (EU) 2016/679) is a regulation by which the European Parliament, the Council of the European Union and the European Commission intend to strengthen and unify data protection for all individuals within the European Union (EU). It replaces the existing law we have on data protection (the *Data Protection Act 1998*) and gives individuals more rights and protection in how their personal data is used. GDPR requires organisations to monitor, maintain and keep records of the effectiveness of their data protection methods.

1.2 Data protection principles

A key element of this is setting the type of consent to permit the processing of personal data. Historically, as a membership organisation that provides benefits to its members by post or electronically, OSS has not actively sought consent from its members or supporters.

With this in mind we have undertaken a balanced assessment of the consent/privacy impact of the society's decision to use the 'legitimate interest' provision of the GDPR (Appendix 1). To find out more about 'legitimate interest', go to:

<https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/lawful-basis-for-processing/legitimate-interests/>.



The Open Spaces Society 25a Bell Street Henley-on-Thames RG9 2BA

Charity no 1144840 Registered in England and Wales, limited company no 7846516



1.3 Responsibilities

Within OSS, the data protection lead is the Office Manager. All OSS staff handle personal data and are expected to work within this document. Privacy is a human right that benefits us all; data protection is people protection.

1.4 General data security

We hold your personal information in accordance with the General Data Protection Regulation as introduced on 25 May 2018. We use industry-standard Secure Server Software (SSL) for your transactions via our website. This encrypts your personal information so that it cannot be read as it travels over the internet.

Please ensure you take the following action when creating your OSS online account:

- Use a **strong password** which cannot be guessed and avoid using the same password for different accounts. Don't share your password with anyone.

2. Why we collect personal information

You may give us your personal information in order to sign up for membership, make a donation, subscribe to our electronic newsletter (ezine) or post a comment on our website or social media. The personal information we collect might include your name, address, telephone number, email address, payment card and/or bank details. We collect this information only in connection with specific activities such as processing membership or donations, or sending information about our work. We will only share your information with trusted suppliers in order to carry out these transactions.

2.1 The personal information we may collect

- Your name
- The name of your group or other organization if applicable
- Your address
- Your telephone number
- Your email address
- Your payment card details
- Your bank account details

2.2 What your personal information may be used for

- To fulfil your membership application
- To process membership subscriptions, donations or other payments
- To set up or alter your direct debit instructions
- To confirm details of your gift aid status where applicable
- To ask you to support specific OSS appeals
- To ask you to support specific OSS campaigns by, for instance, lobbying your MP or AM
- To send you our publication *Open Space*

- To send you our ezines
- To invite you to take part in marketing or research on the society's activities and communications
- To invite you by email to respond to relevant consultations within your local authority area
- To call you with regard to your membership
- To call you with regard to matters relating to the society's work in your area
- To send you details of our Annual General Meeting and an invitation to attend
- To send you information on training courses run by the society where relevant
- To send you information on any events run by the society if requested to do so.

3. Retention of data

We shall store personal information about your membership or support only for as long as necessary, normally until the latest of 10 years after your membership expires, your last financial contribution or other activity with us, unless we have a good reason to keep your information for a longer period. This is based on any legal, regulatory or business reasons we may have to retain your information.

We shall keep other information which may include personal data about you in accordance with the following principles:

- Casework and policy files—indefinitely for the purposes of casework management in relation to the same location or place, or policy management in relation to that policy.
- Emails not related to casework or policy—seven years for purposes of general management.

4. Use of our website and linked websites

- Our privacy policy does not apply if you follow a link from the society's website to any third party website, and give any personal information to that third party. The uses to which your information will be put will be determined by that third party's privacy policy.
- Third parties, including Google, Facebook and Twitter, may use cookies and other similar technologies to collect or receive information from our website and use that information to provide measurement services, audience insights and targeted advertisements. This helps the society to gather data so we can improve our website and digital communications. These cookies are anonymous and store information about the content you browse but not personal information about you. Users can opt-out of the collection and use of information for ad targeting by using <http://www.youronlinechoices.eu/> or similar sites.
- Your web browser will let you choose whether to accept, not to accept or be warned before accepting cookies. Depending on your browser, these settings can normally be found in the tools/options menu under privacy and security or similar.
- Your information may be shared with us by independent organisers or fundraising sites such as JustGiving or Easyfundraising. These independent third parties will only do so when you have indicated that you wish to support

OSS and with your consent. You should check their privacy policy when you provide your information to understand fully how they will process your data.

5. Consent and updating your information

By disclosing your personal information to us, including having supported us in the past and not chosen to change your mailing preferences, you give your consent to the collection, storage, processing and use of your personal information by the society as described in this privacy policy.

You can change your mailing preferences at any time either by visiting your [online account](#) (if you are a registered member of the society) by emailing us at office1@oss.org.uk, by phoning 01491 573535, or by post to 25a Bell Street, Henley-on-Thames RG9 2BA.

6. Opting out of electronic communications

Electronic newsletters and e-mailshots will include a separate option to opt-out of any such future communications. This is in addition to your right to change your mailing preferences at any time either by visiting your [online account](#), by emailing us at office1@oss.org.uk, by phoning 01491 573535, or by post to 25a Bell Street, Henley-on-Thames RG9 2BA.

7. Your rights

- You have the right to ask for a copy of the information we hold about you and to have any inaccuracies corrected.
- You have the right to ask us to delete any personal information we hold about you.
- If you wish to access your personal data, please write to us at 25a Bell Street, Henley-on-Thames RG9 2BA.

8. Changes to Privacy Policy

We recognise the importance of privacy to our members and supporters and will keep this policy under review. Any changes that we might make will be posted on the website.

9. Complaints Policy

OSS is committed to delivering a high standard of service to anyone who engages with our work. However there may be times when we fall short of these high standards and when this happens we would like to know, so we can put things right and make the necessary improvements.

9.1 What to do if you have a complaint?

Please let us know as quickly as possible. You can:
phone : 01491 573535



email : office1@oss.org.uk
or write: Office Manager, Open Spaces Society, 25a Bell Street,
Henley-on-Thames RG9 2BA

9.2 What happen next?

If you contact us by phone, we will try to resolve the issue there and then. If you make a complaint by email or in writing we will acknowledge your complaint within 3 working days, and do everything we can to resolve it within 10 working days.

9.3 If further action is needed?

a. However, if you feel your complaint is still unresolved, then please write to the General Secretary of the Open Spaces Society at the above address. Your complaint will be reviewed and a response sent in writing within 14 working days.

b. If your complaint is about our fundraising activities and we are unable to resolve it to your satisfaction, you can ask the Fundraising Regulator, the independent regulator of charitable fundraising, to consider it by:

- submitting your complaint through the Fundraising Regulator website www.fundraisingregulator.org.uk ;
- writing to the Fundraising Regulator, 2nd floor, CAN Mezzanine Building, 49-51 East Road, London, N1 6AH; or
- telephoning 0300 999 3407

Open Spaces Society April 2018

CAMPAIGNING
SINCE 1865

The Open Spaces Society 25a Bell Street Henley-on-Thames RG9 2BA



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Appendix 1

Balanced assessment of legitimate interest or privacy impact assessment as applied to members of the Open Spaces Society

Use of member/s' data	Do we have legitimate interest, taking into account member/s' reasonable expectations?	Are we sure OSS is not overriding the member/s' fundamental rights?	Are we confident OSS passes legitimate interest test?
Fulfill member applications	Yes	Yes	Yes
Process subscriptions, donations, other payments, direct debits, gift aid	Yes	Yes	Yes
To call, email or write with regard to membership including renewals and reminders	The member would reasonably expect us to contact them as part of their subscription	Yes	Yes
To email or write requesting support for specific appeals*	The member would reasonably expect us to send such material in support of our work	Yes	Yes
To email or write requesting support for specific campaigns	The member would reasonably expect us to send such material in support of our work	Yes	Yes
Send our publication <i>Open Space</i> *	The member would reasonably expect us to send such material as part of their subscription	Yes	Yes
Send our electronic newsletters, 'Ezines'	The member would reasonably expect us to send such material in support of our work	Yes	Yes
Invite members to take part in marketing or research relevant to OSS	The member would reasonably expect us to invite such participation in relation to our work	Yes	Yes
Call, email or write to members in respect of local consultations	The member would reasonably expect us to invite such participation in relation to our work	Yes	Yes
To email or write with information on training courses run by or with OSS	The member would reasonably expect us to send such material as part of their subscription	Yes	Yes
To email or write with information on events held by or with OSS	The member would reasonably expect us to send such material as part of their subscription	Yes	Yes

* Additionally, GDPR is clear that direct marketing may be considered a legitimate interest; sending publications and appeals is classified as direct marketing.