



# PRIVACY POLICY

The privacy and security of your personal information is extremely important to us. This privacy policy explains how and why we use your personal data, to make sure you stay informed and can be confident about giving us your information.

This privacy policy sets out how we collect and use your personal information about you from using our website, social media pages or providing your personal information to us otherwise.

We may make changes to this policy from time to time. If we do so, we will post the changes on this page and they will apply from the time we post them.

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## WHO ARE WE?

The Blue Marine Foundation (BLUE) was established in March, 2010. BLUE exists to combat overfishing and the destruction of biodiversity – arguably the greatest problem facing the world’s oceans by delivering practical conservation solutions, including the creation of largescale marine reserves. Overfishing represents a major food security issue and has devastating consequences for the fragile biodiversity of our planet. Around 90 per cent of global fish stocks are fully or overexploited and around 90 per cent of large fish are gone. The consequences are far reaching, not only for the future of food for a growing global population, but because healthy oceans absorb half the CO2 we produce. BLUE’s aim is to put at least 10% of ocean under protection by 2020 and 30% by 2030. We also work to establish sustainable fisheries so fish stocks can recover and help to protect critically endangered species, where we feel our intervention can have the greatest impact.

BLUE also has a trading subsidiary BMT Trading Limited and this policy covers activities of BMF Trading Limited too (where relevant).

## OUR COMMITMENT TO YOUR PRIVACY

We are committed to keeping the personal details of our supporters safe. This policy explains how and why we use your personal data, to ensure that you remain informed and in control of your information.

Any references to Blue Marine Foundation, BLUE or to 'we', 'our' or 'us' refer to:

- Blue Marine Foundation. We are a registered charity in England and Wales, and our registered charity number is 1137209. Company Registered No: 07176743; and (if appropriate)
- BMF Trading Limited, a wholly owned subsidiary of the Blue Marine Foundation. Company Registered No: 07004094

We use three key definitions to describe people mentioned in this policy. These are definitions used by the Information Commissioner's Office (ICO), the UK's independent body set up to uphold information rights ([www.ico.org.uk](http://www.ico.org.uk)).

- **'Data subject'**: this is you, one of our supporters. As the data subject, we respect your right to control your data.
- **Data controller'**: this is us, Blue Marine Foundation. With your permission, we determine why and how your personal data is used (as outlined in this policy).
- **'Data processor'**: this is a person, or organisation, which processes your data on our behalf, with your permission. For example, CAF Donate who process donations via our website or the logistics company who organise our London to Monaco cycle and collects information such as medical history or date of birth.

When we work with other organisations or individuals that act as Data Processors, we will ensure that such arrangements comply with data protection legislation. The third parties we work with at no point 'own' your data, so you will never hear from them independently, and they will always delete your data from their systems when they have completed the task in hand. We will never sell your personal data.

Should you wish to find out more about the information we hold about you, or about our privacy policy, please contact us:

Head of Operations

0207 845 5850

Email: [info@bluemarinefoundation.com](mailto:info@bluemarinefoundation.com)

Somerset House, South Building, The Strand, London, WC2R 1LA

Our office hours are Monday – Friday, 9am – 6pm.

## WHY DO WE COLLECT YOUR PERSONAL DATA?

We will only ever collect, store and use your personal data when we have an identified purpose and reason to do so, this will usually be for information about our work, to invite you to attend appropriate events, fundraising purposes, office management (though we are regulated in these activities by the Fund Raising Regulator) and feedback and other legitimate interests. The ICO refers to this as a 'lawful basis'.

Your personal data also helps us to get to know you better and to develop a 'profile' of you on our secure supporter database. This 'profile' enables us to send you the information listed above in a timely and relevant way, to suit you. For example, keeping track of the events you have been involved with (such as the London to Monaco cycle ride) helps us to send you information about any events that we feel you would like to hear about.

BLUE will only contact you for the following reasons (though these may be updated from time to time as our operations change):

### **a) Fundraising or supporting a particular BLUE initiative**

BLUE undertakes very little 'direct marketing' however occasionally our newsletter or other mailshots will include calls for support for some initiative or funds (though of course these are regulated by the Fundraising Regulator). As a matter of politeness BLUE have always had a policy which enabled any recipients of such information to unsubscribe, now it seems the rest of the world has caught up with the GDPR Regulations. To subscribers prior to 25 May 2018 we are therefore relying on the "soft opt in" provisions of the GDPR to carry across our database, for those subscribing after that date our practice will continue with opt in provisions and a provision for removal from our database in the normal way. BLUE does not undertake unsolicited marketing, we find that it annoys people.

### **b) To enable you to volunteer with us**

If you are a BLUE volunteer, we collect appropriate personal data so that we can keep in touch with you about, for example:

- details and changes to planned volunteer work programmes that you may be taking part in
- the positive impact you have on our work, by sending you relevant newsletters

As defined by the ICO, the lawful basis for processing your data for these purposes is 'contractual' (where administering your volunteer record) and 'legitimate interest' (when sending you information about our work).

## **c) To buy or sell goods or services**

We collect personal data to comply with contractual responsibilities when we buy and sell goods and services from others. BLUE does not currently undertake retail activity to the public but does engage in some partnership arrangements trading subsidiary BMF Trading Limited.

The ICO define the lawful basis for processing personal data for these purposes as 'contractual'.

## **d) To attend our events**

We collect your personal data (such as the 'Basic Information' mentioned in the section below) to facilitate ballots for, and your attendance at, BLUE events. Our legal basis for collecting this personal data is our legitimate interest in contacting you and registering you (or your place of work / education) for our event.

## **e) Raising awareness including with our sponsors.**

If you attend a BLUE event, we may ask for your feedback, which we may share with our partners and sponsors. Our legal basis for collecting personal data in any feedback is our legitimate interest in improving our events and demonstrating their success to our partners and sponsors.

If you attend a BLUE event, we may also engage in filming and photography to promote the event and our conservation initiatives. If this is the case, and unless we can rely on another lawful basis (which we communicate to you at the time), we will obtain your (or if a child is involved, a parent / guardian's) prior written consent before engaging in such activities. Where we have not relied on another lawful basis other than consent, and you have either: (i) not given your consent; or (ii) withdrawn your consent, we will ensure that your face is blurred from any final media production we produce.

If you provide your consent, you can opt-out at any time by contacting us at [info@bluemarinefoundation.com](mailto:info@bluemarinefoundation.com).

## **f) To meet our legal obligations**

We collect personal data in order to comply with legal obligations such as providing information to bodies such as HMRC, Charity Commission, Companies House, HSE and the Charity Commission.

The ICO define the lawful basis for processing personal data for these purposes as 'legal obligation'.

## **g) To enable effective functioning of our organisation**

We collect personal data to enable BLUE to operate effectively in a variety of ways such as:

- liaising with government, authorities and local communities about conservation activities

- running engagement activities such as conferences, events and educational outreach
- evaluating events, campaigns and website activity
- office management
- research and statistical analysis
- responding to feedback, complaints and compliments to staff,
- complying with regulators eg, Fundraising Regulator, the Charity Commission
- safeguarding, health and safety, security

The ICO define the lawful basis for processing personal data for these purposes as 'legitimate interest'.

## WHAT KIND OF PERSONAL DATA DO WE COLLECT? HOW DO WE COLLECT IT?

### **a) Basic information**

We will usually collect basic information about you, including your name, email address, telephone number and in some cases your place of work or education.

Most of the time, we collect this data from you directly. Sometimes this is in person; other times, it is by email, over the telephone or in writing. Occasionally we obtain information, such as your email address or telephone number or other contact details, from an existing supporter/contact who deems that you have a legitimate interest in BLUE's work.

If you are (or make an application to be) a guest attendee at an event hosted by BLUE such as (Future Generations' Premiere of OCEAN WITH DAVID ATTENBOROUGH), we will collect Basic Information either from you or your place of work or education.

### **b) Getting to know you better**

We also collect information about you that helps us to get to know you better. This may include:

- records of donations you have made
- your preferences of how you would like us to contact you
- ways you have helped us through volunteering your time

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- records of events you have attended and meetings you've had with members of the team.

Sometimes we may collect other information about you. When we do so, will be very clear as to why we are collecting such information, and we will only do so with your specific consent and permission.

If you do not wish for your data to be collected in any of these ways, or have questions about them, please contact us.

Head of Operations

Telephone: 0207 845 5850

Email: [info@bluemarinefoundation.com](mailto:info@bluemarinefoundation.com)

Blue Marine Foundation, Somerset House, South Building, London, WC2R 1LA

Our office hours are Monday – Friday, 9am – 6pm.

Other ways in which we collect personal data to get to know you better include:

## **c) Sensitive personal data**

We do not normally collect or store sensitive personal data (such as information relating to health or emergency contact details). However, there are some situations where this will occur (such as if we need to be aware of any medical conditions because you are a volunteer or you are attending a BLUE event)

When we do so, we will be very clear as to why we are collecting such information, and we will only do so with your specific consent and permission. In these situations, we collect the data from you directly or through your place of work or education.

We may also collect sensitive personal data if you have an accident on one of our project locations. This information will be retained for legal reasons, for safeguarding purposes and to protect us (including in the event of an insurance or legal claim). If this does occur, we will take extra care to ensure your privacy rights are protected.

## **d) Children and young people**

In line with data protection law, we will not collect, store or process your personal details if you are under 13 years of age; unless we have the express permission from your parent or guardian to do so.



## HOW DO WE STORE YOUR DATA?

### **a) Security**

All of the personal data that is processed by BLUE is done so by our staff in the UK. However, for the purposes of IT hosting and maintenance your information may be situated outside of the European Economic Area (EEA). BLUE are monitoring carefully the implications of Brexit on this arrangement. This will be done in accordance with guidance issued by the Information Commissioner's Office.

Electronic data and databases are stored on secure computer systems and we control who has access to information (using both physical and electronic means). We have documents relating to data protection procedures which personnel are required to follow when handling personal data.

### **b) Payment security**

When processing donations via our website, visitors are re-directed to CAF Donate, a trusted worldwide fundraising platform. Please see CAF Donate's privacy policy [here](#) for details regarding how your financial details are stored and your data processed.

BLUE complies with the payment card industry data security standard (PCI-DSS) published by the PCI Security Standards Council, and will never store card details.

We cannot guarantee the security of your home computer or the internet, and any online communications (e.g. information provided by email or our website) are at the user's own risk.

### **c) Data retention policy**

We will only use and store information for as long as it is required for the purposes it was collected for.

If you attend a BLUE event, we will retain the personal data collected during filming and photography for a period of six months from the date of the event. This retention period allows us to process and utilise the media for our promotional activities. After six months, all personal data related to the footage will be securely deleted or anonymised.

## YOUR RIGHTS

We respect your right to control your data. Your rights include:

### **a) The right to be informed**

This privacy notice outlines how we capture, store and use your data. If you have any questions about any elements of this policy, please contact us.

### **b) The right of access**

If you wish to obtain a record of the personal data we hold about you, please email [info@bluemarinefoundation.com](mailto:info@bluemarinefoundation.com).

### **c) The right to rectification**

If we have captured information about you that is inaccurate or incomplete, we will update it.

### **d) The right to erase**

You can ask us to remove or randomise your personal details from our records.

### **e) The right to restrict processing**

You can ask us to stop using your personal data.

### **f) The right to data portability**

You can ask to obtain your personal data from us for your own purposes.

### **g) The right to object**

You can ask to be excluded from marketing activity.

### **h) Rights in relation to automated decision making and profiling**

We respect your right not to be subject to a decision that is based on automated processing.

### **i) Right to withdraw consent**

Where the processing of your personal data by us is based on consent, you have the right to withdraw that consent without detriment at any time by contacting us at [info@bluemarinefoundation.com](mailto:info@bluemarinefoundation.com).



## J) Right to complain

If your request or concern is not satisfactorily resolved by us, you may approach your local data protection authority.

The [Information Commissioner](#) is the supervisory authority in the UK and can provide further information about your rights and our obligations in relation to your personal data, as well as deal with any complaints that you have about our processing of your personal data. For more information on your individual rights, please see the [Information Commissioner's Office](#).

## FEEDBACK TO BLUE

### a) Positive Feedback

BLUE staff are incredibly committed to the organisation and its aims and ambitions. We live in a world which is increasingly fractious, and while we want to hear about any mistakes or concerns we also want to hear about actions which BLUE staff have undertaken which has genuinely made a difference. Any correspondence on these matters can be treated as confidential if required – but such correspondence is incredibly useful to the morale of the organisation and for the BLUE board.

### b) Making a complaint and other feedback

If there are issues with the provision our activities, we want to hear about it, in order to deal with the situation as quickly as possible and put measures in place to stop it happening again.

We take complaints very seriously and we treat them as an opportunity to develop our approach. This is why we are always very grateful to hear from people who are willing to take the time to help us improve.

#### Our policy is:

- To provide a fair complaints procedure that is clear and easy to use for anyone wishing to make a complaint.
- To publicise the existence of our complaints procedure so that people know how to contact us to make a complaint.
- To make sure everyone in our organisation knows what to do if a complaint is received.
- To make sure all complaints are investigated fairly and in a timely way.

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- To make sure that complaints are, wherever possible, resolved and that relationships are repaired.
- To learn from complaints and feedback to help us to improve what we do.

## Confidentiality

All complaint information will be handled sensitively, in line with relevant data protection requirements

## Responsibility

Overall responsibility for this policy and its implementation lies with the Head of Operations.

If you wish to give feedback: positive, negative or just useful, then please contact us:

Telephone: 0207 845 5850

Email: [info@bluemarinefoundation.com](mailto:info@bluemarinefoundation.com)

Somerset House, South Building, The Strand, London, WC2R 1LA

Our office hours are Monday – Friday, 9am – 6pm.

## Information Commissioner's Office

For further assistance with complaints regarding your data, please contact the Information Commissioner's Office, whose remit covers the UK.

## Information Commissioner's Office

Wycliffe House

Water Lane

Wilmslow

SK9 5AF

Telephone: 0303 123 1113

Email: [casework@ico.org.uk](mailto:casework@ico.org.uk)

# LINKS TO THIRD PARTY WEBSITES

Our websites contain links to third party websites that we believe may be of interest to our website visitors. This privacy policy only governs our websites and we are not responsible for the privacy policies that govern third party websites even where we have provided links to them. If you use any link on our website we recommend you read the privacy policy of that website before sharing any personal or financial data.

## SOCIAL MEDIA SITES

We operate a number of social media pages (including Facebook, Twitter, Vimeo and Instagram). Although this policy covers how we will use any data collected from those pages it does not cover how the providers of social media websites will use your information. Please ensure you read the privacy policy of the social media website before sharing data and make use of the privacy settings and reporting mechanisms to control how your data is used.

## GET IN TOUCH

Should you wish to find out more about the information we hold about you, or about our privacy policy, please contact us:

Head of Operations

Telephone: 0207 845 5850

Email: [info@bluemarinefoundation.com](mailto:info@bluemarinefoundation.com)

Somerset House, South Building, The Strand, London, WC2R 1LA

Our office hours are Monday – Friday, 9am – 6pm.

## COOKIES POLICY

We are committed to protecting you and your family's personal information when you're using our website, and to providing users with a clear understanding of how and why we use cookies.

Cookies are small text files that are placed on your computer by websites that you visit. They are widely used in order to make websites work, or work more efficiently, as well as to provide information to the owners of the site. They help us to identify which of our pages are the most popular and what type of journey a visitor has through our site.

### First party cookies

This site uses cookies in several places – we've listed each of them below with more details about why we use them.

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## Third party cookies

We use a number of suppliers who may also set cookies on their websites' on its behalf. This site does not control the dissemination of these cookies. You should check the third party websites for more information about these.

Cookie name	Cookie Description
1P_JAR	Google advertising cookie used for user tracking and ad targeting purposes
IDE	
DV	
NID	
CONSENT	Google cookie consent setting
__ga	Google analytics cookies – These are used to collect information about how visitors use the Sites. The cookies collect information anonymously, including the number of visitors to the sites, where visitors have come to the sites from and the pages they have visited. We use this information to compile reports and to help us improve the sites.
__gat	
__gid	
campaignMonitorViewedIDs	Campaign monitor cookie for logging email newsletter signups
resolution	Used to log screen resolution

Most web browsers allow some control of most cookies through the browser settings. To find out more about cookies, including how to see what cookies have been set and how to manage and delete them, visit [www.allaboutcookies.org](http://www.allaboutcookies.org)

To opt out of being tracked by Google Analytics across all websites visit <https://tools.google.com/dlpage/gaoptout>