

The Rivers Trust Source To Tap Pilot Land Incentive Scheme Privacy Notice v1.6

The Source to Tap project runs from 2017 to 2021. It is funded by the European Union's INTERREG VA Programme, the Department for Agriculture, Environment and Rural Affairs (DAERA) in Northern Ireland, and the Department for Housing, Planning and Local Government (DHPLG) in Ireland. It is managed by the Special EU Programmes Body (SEUPB).

The project is being delivered by a consortium of partners:

- Northern Ireland Water;
- Irish Water;
- Agri-Food & Biosciences Institute;
- East Border Region;
- The Rivers Trust;
- Ulster University;

The Source to Tap Project Officer who has been assigned to you for the purposes of the pilot Land Incentive Scheme is an employee of The Rivers Trust and this privacy notice applies to The Rivers Trust.

To help The Rivers Trust (RT) manage our relationship with you and provide farm advice and grant funding, we need to collect, store and use your personal information. From a legal point of view, this is known as 'processing personal data'.

Looking after your personal data is as important to RT as it is to you. The information in this Privacy Notice will explain:

- Who we are
- How and why we process your personal data
- Your rights
- How you can get in touch with us if you need to

RT's aim is to respect your privacy and comply with current EU data protection legislation (EU General Data Protection Regulation (GDPR)).

SUMMARY NOTICE

- We keep to a minimum the information we hold about you.
- We use your information to respond to your enquiries, manage our relationship with you, plan visits to your farm, provide you with advice, support your grant applications and pay your claims.
- We also use your data to help us assess the effectiveness of the scheme and to produce summary information for reporting on project progress to the partners and funders
- We delete your data when we no longer need it.
- We only share your personal information with other organisations involved in the Source To Tap project when we need to, and we only share the data that each partner needs to use.
- We ensure that any organisations which we share your data with are also aware of what they need to do to protect your privacy.
- You have lots of privacy rights.
- We take security seriously.
- We are happy to answer your questions about any of this.

FULL NOTICE

The sections below tell you what personal information is, who we are and what we do, what personal information we collect and what we do with it. They explain how GDPR protects you by controlling what RT and our Source to Tap partners can do with your personal information and clarify how to complain or withdraw your consent. They also tell you how long we keep your personal information, how you can get a copy of it or ask for it to be changed or removed, and with whom we might lawfully share your personal information.

What is personal information?

Personal information is anything that identifies and relates to a living person. This can include property or lands information i.e. farm data, which is considered biographically significant and, when put together with other information, can then identify a person; for example, your name and contact details, or farm business details.

Who we are and what we do

RT is an environmental Non-Government Organisation, a registered charity (Registered Charity No: 1107144) and is the umbrella body of the Rivers Trust movement, in the UK and Ireland.

With the support of over 60 member Trusts, we work on the ground, with communities, farmers, landowners and businesses to plan and implement action to protect, promote and enhance our freshwater ecosystems for both people and wildlife.

We work in partnership with many organisations to achieve this, and we need to share your personal data with these organisations to help us fund, plan and manage the actions. These organisations are referred to as 'data processors'. Any data processor RT uses also have their own legal responsibility for handling your data.

RT's registered office address is:

Rain-Charm House
Kyl Cober Parc
Stoke Climsland
Callington
Cornwall
PL17 8PH
United Kingdom

Data Protection responsibility within The Rivers Trust sits with company secretary Mr Peter Dillon who can be contacted via these means:

Telephone: +44(0)1579 372142

Email: info@theriverstrust.org

Who does this Privacy Notice apply to?

This Privacy Notice relates to the collection and use of the personal data of farmer and landowner contacts, and those acting on their behalf, including individuals and sole traders.

How we process your personal data

RT will process the personal data you provide in a manner that complies with the General Data Protection Regulation (GDPR) and the Data Protection Act 2018. RT will endeavour to:

- Keep your information accurate and up-to-date
- Not keep it for longer than needed, and
- Keep it safe, only permitting access to the those who need to use it

Personal data which you supply to us may be used in a number of ways:

- We need to keep your name, address and contact details so that we can arrange farm visits, help you submit your Land Incentive Scheme (LIS) funding application, tell you about training or technical workshops which are relevant to the project, and monitor the environmental outcomes of the actions which we help you to implement.
- We collect your farm business data and map data about your farm practice, so that we can plan the most effective actions to address the specific environmental issues on your farm. We also need this information so that we can crosscheck your funding application against other grant schemes, to ensure that we are not breaching the strict legal requirements of the European Commission, who provide the funding for the project and the grant scheme.
- Where possible, data will be pseudo-anonymised before it is shared with project partners for further analysis. This means that your name and any identifying details of your farm will be removed however a unique identifier will be retained. This unique identifier cannot be linked back to you and your farm without access to the full database, which is only held by RT and Irish Water.
- We need to collect bank details in order to process your grant payments, and to provide proof to the European Commission that the grants have been spent on the agreed actions and in compliance with their legal requirements.

How do we collect personal data?

RT may collect your contact details from you when you enquire about the Land Incentive Scheme by phone, email or in person. We will collect further personal data when we visit your farm, and on subsequent visits, phone calls or emails whilst we are preparing your farm plan and whilst we are supporting you through the funding application process.

We may also collect your personal details when our project partners refer your enquiries to us, or when your business contacts refer your enquiry to us.

We use securely encrypted laptops to record your data when we visit you, uploading this to secure servers when we return to the office. We also use mobile phones to gather spatial data about your farm, including information about potential runoff and erosion issues which the Land Incentive Scheme grants could be used to tackle. This survey data includes photos of your farm buildings, yards, fields and infrastructure. These are held temporarily on the mobile phone (secured with a passcode) until the project officers return to the office, when the data are securely uploaded to a cloud service and removed from the mobile phone.

Our lawful basis for processing personal data

GDPR states a data controller like RT must have a lawful basis for processing your information. The lawful basis on which personal data of farmers and landowners will be processed is by seeking your explicit consent. This will be done by providing you with a consent form when we first visit your farm. The form will ask you to confirm that you understand why we are gathering your personal data, how we will process it, how we will secure it, how long we will keep it and who we share it with. We will ask you to sign and date this form and you will be given a copy of that and this full privacy notice for your records.

How long we keep your personal data

We will not keep your personal data longer than is necessary. Farmer and landowner's personal data will be securely archived and retained for 7 years after the end of the Source to Tap project in order to satisfy the requirements of the project auditors.

Who we share your personal data with and why

RT works with a number of organisations to manage the Source to Tap project, and needs to share some of your personal data with these project partners to administer funding, to ensure that the grant scheme complies with the legal requirements of the funder (The European Commission) and to help analyse the effectiveness of the grant scheme in tackling some of the issues which the project is designed to address. Where we share data with our partners, there is a legal agreement in place to make sure the organisation complies with data protection legislation.

Who sees or has access to your personal data will depend on why we need to process it but the organisations we share with include

- Northern Ireland Water;
- Irish Water;
- The Department of Agriculture, Environment and Rural Affairs;
- The Department for Housing, Planning and Local Government;
- The Department of Agriculture, Food and the Marine;
- The Agri-Food & Biosciences Institute, ESRI Inc,
- The East Border Region,
- The University of Ulster,
- Special EU Programmes Body,
- European Commission Auditors.

You can find a detailed breakdown of exactly which data we share with each partner in the following section:

What data (including personal data) we collect and what we do with it

To complete a Water Environment Management Plan and progress an application for funding through the pilot Land Incentive Scheme, the following data (including personal data) will be collected by RT:

- Title,
- First Name,
- Second Name,
- Age range,
- Address,
- Telephone Number,
- Mobile Telephone Number,
- Email address,
- Photographs of farms and associated land
- Farm Business Number (Northern Ireland only),
- Herd Number (Ireland only),
- Farm name,
- GPS coordinates of farm business address
- VAT number,
- Farm size (ha), area owned, area rented in, area rented out,
- Area for fodder/secondary grass
- Field numbers
- Activities on farm,
- Most important activity for income,
- Whether you are in an agri-environment agreement (e.g. EFS, ESA, CMS, GLAS, OTHER),
- Environmental designations related to the farm business (e.g. ASSI, SAC, AONB),
- Whether you soil test,

- Soil type,
- Type of livestock on farm,
- Number of livestock,
- Livestock diet,
- Housing type,
- Length of time used,
- Type and amount of pesticide/herbicide used,
- Application method,
- Percentage of visible rush cover,
- Visible issues impacting stream health, including sediment and pesticide runoff, and photos of your farm business.

What we will do with your personal data at the initial stages of enquiry, farm visit and preparation of Water Environment Management Plan:

What we will share	Who we will share it with	Why we are sharing it
All of the above data	<ul style="list-style-type: none"> • Northern Ireland Water • Irish Water 	For the purposes of project planning and monitoring
All of the above data except Title, First Name, Second Name, Address, Farm Business Number (Northern Ireland only), Herd Number (Ireland only), farm name, field numbers.	<ul style="list-style-type: none"> • Agri-Food and Bioscience Institute 	For the purposes of economic assessment of the pilot Land Incentive Scheme. By removing your personal and farm details the data will be anonymised.

If you proceed with an application for funding under the Source to Tap Pilot Land Incentive Scheme, in addition to the above the following data will be collected by RT:

- Bank name,
- bank account number and sort code,
- IBAN,
- ICBAN,
- original invoices and receipts and receipted invoices,
- copies of bank statements showing defrayment of payments for invoices received (all other none related statement information should be redacted),
- original letters of consent, where relevant (e.g. Northern Ireland Environment Agency, National Parks and Wildlife Service, Planning Permission etc).

What we will do with your data at the funding application stage:

What we will share	Who we will share it with	Why we are sharing it
Original invoices and receipts and receipted invoices, copies of bank statements showing defrayment of payments for invoices received (all other none related statement information should be redacted)	<ul style="list-style-type: none"> • East Border Region • Department of Agriculture, Environment and Rural Affairs, Department for Housing, Planning and Local Government 	For the purposes of verifying expenditure and grant claims and the detection of fraud.

	<ul style="list-style-type: none"> • Special EU Programmes Body (SEUPB) • European Commission Auditors 	
First Name, Second Name, Address, Farm Business Number (Northern Ireland only), Herd Number (Ireland only), farm name, field numbers and whether you are in an agri-environment agreement (e.g.EFS, ESA, CMS, GLAS, OTHER)	<ul style="list-style-type: none"> • Department of Agriculture, Environment and Rural Affairs (for Northern Ireland farm business only) • Department of Agriculture, Food and Marine (for Irish farm business only) 	For the prevention of dual EU funding and detection of fraud

Where is your personal information processed?

The Source To Tap project office is in Northern Ireland, and RT’s project staff work with farmers and landowners in Northern Ireland and the Republic of Ireland. RT’s head office is in Cornwall, England. Our partner organisations are in Northern Ireland and the Republic of Ireland, and we report our project outputs to the European Commission.

RT uses cloud service providers (CSPs) for processing your personal data. These CSPs are Dropbox, Microsoft Office365 and ESRI ArcGIS Online. Each of these CSPs uses distributed storage, which means that your personal data can be stored across servers and data centres in the EU and US. Each of these CSPs is certified under the EU-US Privacy Shield programme, which means that even though your data may be processed in the US, your rights are protected under EU law (GDPR) just as if your personal data were stored solely in the EU. Each of the CSPs is also certified under ISO/IEC 27018, which is the international standard for securely protecting personal data transferred to and processed in the cloud.

You can find out more about the detail of each of these CSPs’ data protection and privacy policies, and view their certifications here:

Dropbox: https://www.dropbox.com/en_GB/business/trust

ESRI: <https://doc.arcgis.com/en/trust/>

Microsoft: <https://www.microsoft.com/en-us/trustcenter/>

Protecting your personal data

We are committed to ensuring that your personal data is secure. In order to prevent unauthorised access or disclosure, RT has put in place appropriate technical, physical and organisational procedures to safeguard and secure the information we collect about you. These measures include disk-level encryption of laptops, and passcode protection of mobile phones, which are used to gather and transport your personal data from the farm to the office, and secure end-to-end encryption of data whilst it is transferred to cloud service providers (Dropbox, Microsoft, ESRI). This is backed up by staff training and procedures to ensure that all staff involved with processing your personal data understand how to keep it secure and how to comply with the requirements of GDPR.

Your rights

- **You can withdraw your consent** to the use of your personal data at any time. Though, in some cases, we may not be able to comply. If this is the case, we will tell you and explain why.
 - **Subject to some legal exceptions, you have the right to request a copy of the personal information RT holds about you.** You have the right to ask for all the information RT holds about you and the services you receive from us. When we receive a request from you in writing, we must give you access to everything we've recorded about you within one month of receiving your request
 - **you have the right to have any inaccuracies corrected.** You should let us know if you disagree with something we hold about you. We may not always be able to change or remove that information, but, where we can, we'll correct factual inaccuracies and will include your comments in the record to show that you disagree with it.
 - **You have the right to be forgotten.** In some circumstances, you can ask for your personal information to be deleted; for example:
 - where it is no longer needed for the reason it was first collected.
 - Where you have withdrawn your consent for us to process your information (and where there is no other lawful reason for us to continue processing it);
 - where there is no legal reason for the continued use of your information;
 - where deleting the information is a legal requirement.
 - Where your personal information has been shared with others, we'll do what we can to make sure those using your personal information comply with your request for erasure. Please note that we can't delete your information where:
 - it is for scientific or historical research or statistical purposes, and deleting it would make information unusable; or
 - it is necessary for financial or legal claims.
 - **to place a restriction on our processing of your data.** You have the right to ask us to restrict what we use your personal information for:
 - where you have identified inaccurate information and have told us of it;
 - where we have no legal reason to use that information, but you want us to restrict what we use it for rather than erase the information altogether;
 - Where restriction of use has been granted, we'll inform you before we carry on using your personal information. Where possible, we'll seek to comply with your request, but we may need to hold or use information because we are required to by law.
 - To learn more about all these rights, please see the [ICO website](https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/).
- <https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/>
- Please be aware that there may be circumstances when we are unable to comply with your request to exercise your rights. If this is ever the case, we will inform you of the reason and provide details of how you can register a complaint with the Information Commissioner's Office if you believe we have got this wrong.

Changes to this Privacy Notice

We will update the privacy notice frequently – please ensure you visit the Source to Tap website for the latest version:

<http://www.sourcetotap.eu/privacy-policy/>