

# Whale Track Privacy Policy

For you to submit your sightings records of cetaceans and sharks on the west coast of Scotland through Whale Track we will need to collect some details about you and be able to track your location to monitor the area you are surveying. You must accept this privacy policy to be able to record and contribute data to this project. This privacy policy sets out how the Whale Track app uses and protects any information that you give us through the app, and who has access to it.

Please read this policy carefully, and any other documents referred to in this policy, to understand how we collect, use and store your personal information.

## ***Data Protection***

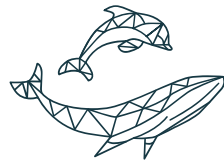
Data collection allows us to operate efficiently and communicate with Whale Track users appropriately, allowing us to put our greatest effort into conservation. To achieve this, Hebridean Whale and Dolphin Trust is also committed to ensuring that your privacy is protected. Should we ask you to provide certain information by which you can be personally identified when using this app, then you can be assured that it will only be used in accordance with this privacy policy. This privacy policy complies with the General Data Protection Regulation, which came into force from 25<sup>th</sup> May 2018.

In order to prevent unauthorised access or disclosure to your personal data, we have put in place suitable physical, electronic and managerial procedures to safeguard and secure the information we collect, both online and through other channels. We will not sell, distribute or lease your personal information to third parties, other than in the ways described within this privacy policy, unless we have obtained your consent or are required by law to do so.

We always strive to provide a transparent and honest approach regarding how and when we may collect and use your personal data. The overview below summarises the different reasons why we do this.

## ***What we collect:***

- To be able to contribute data to this project you will need to set up an account via email or login using your Facebook, Twitter or Gmail account. You will be asked to create a username and provide your email address. Please note that



you will need to choose a suitable username if you wish to submit sightings anonymously.

- When reporting a sighting, you will be asked to provide information about your experience of surveying and identifying marine wildlife, information about where you are watching from, what the environmental conditions were like, as well as what wildlife you saw. The app will automatically log the current date, time and GPS location.\*
- Your device ID (UUID) is submitted to a 3rd Party system called Fabric for the purposes of determining the causes of crashes and to assess usage statistics. No other personal data is collected and the data is deleted from Fabric 90 days after being submitted. For more details view <https://docs.fabric.io/android/fabric/data-privacy.html#>.
- When recording an excursion, the app will also track your location, which it does by capturing your position, speed and heading using the GPS built in to your device. Once you fully close the app, the app will cease tracking your location.

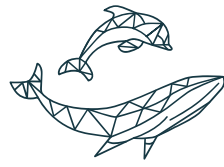
*\*The location at which you saw the animal is really important to help us understand the distribution and occurrence of marine wildlife in this area. Data collected through the excursion mode allows the researchers at the Hebridean Whale and Dolphin Trust to see which areas have been surveyed and calculate the time spent and distance covered looking for animals. This is referred to as "effort" and it is a critical metric used to determine abundance, which increases the scientific value of your records.*

## DO WE PROCESS 'SENSITIVE' PERSONAL INFORMATION?

Under data protection law, certain categories of personal information are recognised as sensitive, including health information, race, religious beliefs, and political opinions ('sensitive personal data'). We would only collect sensitive personal data if there is a clear reason for doing so. **We currently do not collect or process sensitive personal information through the Whale Track app.**

### **Lawful Processing**

HWDT needs a lawful basis to collect and use your personal data. The law allows for six legitimate ways to process people's personal data. Only one of these is relevant to Whale Track users and that is on the basis of a **person's consent**.



**Whale Track will ask for your consent when you sign up to the app to collect and store your personal data, data related to your sightings, and to communicate with you about the project and the wider work of HWDT.**

***What we do with the information we gather:***

The Hebridean Whale and Dolphin Trust will analyse the data submitted through Whale Track to monitor marine wildlife off the west coast of Scotland, identify threats, inform policy decisions and to educate people about the diverse wildlife we have on the west coast. The findings will be presented in many different outputs, which includes but is not limited to; scientific journals, reports and publications, public presentations, sightings updates, press releases, blog posts, magazine articles and social media posts.

HWDT will process information collected via Whale Track for the following reasons:

a. Project Related Purposes

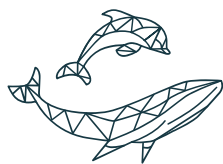
- To validate sightings
- Ask if you are willing to share photos where you indicated you took them
- Contact you with any information and updates about the project
- Internal record keeping
- External project reporting (to funders and charity regulators)
- App developer, Natural Aptitude Ltd., will use your email address to validate your account and to respond to password reset requests
- Thank you communications
- Maintaining “Do not contact lists” (suppression lists)

b. Publicity and Income Generation

- Conventional direct marketing and other forms of marketing, publicity or advertisement, including campaigns and charitable fundraising
- Analysis, targeting, and segmentation to develop corporate strategy and improve communication efficiency
- Processing for research purposes (including marketing research)

c. Governance Purposes

- Carrying out our charitable purpose
- Statutory reporting



#### d. Operational Purposes

- Physical security, IT and network security
- Processing for historical, scientific or statistical purposes

In extreme situations, we may share your personal details with the emergency services if our employees believe it is in your 'vital interests' to do so. We may also share your personal information where we are compelled by law to do so.

### **DATA RETENTION**

We keep your email address and username data on our records indefinitely. This will be used to help us better understand and conserve the local marine wildlife on the west coast of Scotland.

### **DATA SHARING**

#### *Personal Data*

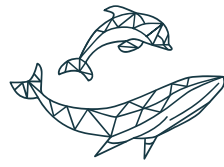
Key information about your sighting (location, date, time, species, number of animals and identification confidence rating) will feed into the Whale Track website (<https://whaletrack.hwdt.org/>) and will be displayed on a map as well as in a table. Your username will be displayed against your sightings to acknowledge you as the contributor. Please make sure you choose a suitable username if you wish to submit sightings anonymously.

The data you submit through the Whale Track app will be stored in a secure online database called Coreo, which is hosted and managed by the project developer Natural Aptitude Ltd. Only the Hebridean Whale and Dolphin Trust and Natural Aptitude Ltd will be able to access the data you submit through Coreo to verify your sightings and to ensure the app is working correctly.

In order for the Hebridean Whale and Dolphin Trust researchers to analyse your data, a local copy will also be stored in their database at their office in Tobermory, Isle of Mull.

Your email address will not be displayed anywhere on the site and these details will not be shared with anyone else, other than in the ways described within this privacy policy.

There are legitimate situations where we may have to share your personal information with other organisations. An example could be where we are using an external service provided via a mailing services provider. In these situations, the relationship between HWDT and the third



party data processor will be governed by a contract and strict security requirements will be in place to protect your personal information.

If you have reported a distressed or deceased animal your username and email address will be forwarded along with the sighting report to British Divers Marine Life Rescue (BDMLR), who rescue marine animals in distress around the UK, or the Scottish Marine Animal Stranding Scheme (SMASS), who collate data from all stranded marine animals around Scotland. They may contact you for more information about the event so that they can respond quickly to rescue the animal or determine the cause of death.

### ***Sightings Data***

Some of the data you collect will be shared with the National Biodiversity Network (NBN), who gather biodiversity information from across the UK. The records shared will consist of your username, location, the species you reported and the date you submitted the record. These records will be available to other organisations, such as charities or government bodies with an interest in biodiversity or conservation as well as members of the general public.

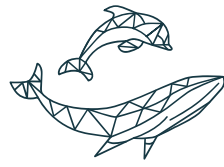
Some of the data you collect will also be shared with other carefully selected data partners which includes other charities (i.e. Sea Watch Foundation), research organisations (i.e. St Andrews University Sea Mammal Research Unit) and government funded bodies (i.e. SNH). We will not share your personal information (name and email address) with these organisations and will only ever provide your username when an acknowledgement to the data recorder is required.

Sharing records with the NBN and our selected data partners is important, because it will help build a long-term picture of UK cetacean populations and distributions, which is used by scientists and government bodies to inform conservation policies.

HWDT will not exchange or sell your personal information to another organisation for their own marketing purposes.

## **DATA PROTECTION RIGHTS**

*Right to be Informed* – You have the right to be told how your personal information will be used. This policy document used on our communications are intended to be a clear and transparent description of how your data may be used.



*Right of Access* – You can request a copy of information we hold on you. From 25<sup>th</sup> May 2018 HWDT will have 30 days to comply once we are satisfied you have rights to see the requested records and we have successfully confirmed your identity.

*Right of Erasure* – From 25<sup>th</sup> May 2018, you have the right to be forgotten (i.e. to have your personally identifiable data deleted).

*Right of Rectification* – If you believe our records are inaccurate you have the right to ask for those records concerning you to be updated.

*Right to Restrict Processing* – In certain situations you have the right to ask for processing of your personal data to be restricted because there is some disagreement about its accuracy or legitimate usage.

*Right to Data Portability* – Where we are processing your personal data under your consent the law allows you to request data portability from one service provider to another. This right is largely seen as a way for people to transfer their personal data from one service provider to a competitor.

*Right to Object* - You have an absolute right to stop the processing of your personal data for direct marketing purposes.

*Right to object to automated decisions* – In a situation where a data controller is using your personal data in a computerised model or algorithm to make decisions “that have a legal effect on you”, you have the right to object. This right is more applicable to mortgage or finance situations. **HWDT does not undertake complex computerised decision making that produce legal effects.**

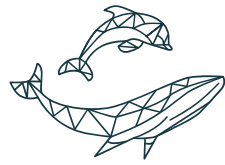
If you want to get in contact with us to check what information we hold on you, withdraw consent, or update our records, please contact us at [whaletrack@hwdt.org](mailto:whaletrack@hwdt.org)

## **NOTICE OF CHANGE**

We may change this policy from time to time by updating this page. You should check this page from time to time to ensure that you are happy with any changes. This policy is effective 25.05.2018.

## **Complaints Procedure**

To make a complaint about how your data is being used, please approach us directly, by contacting [whaletrack@hwdt.org](mailto:whaletrack@hwdt.org) or calling 01688 302620 9am-5pm Monday to Friday.



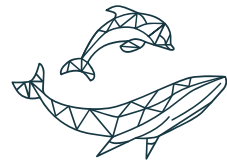
Hebridean  
Whale &  
Dolphin  
Trust

You also have the right to contact the Information Commissioners Office (ICO) if you have any concerns about Data Protection using their help line 0303 123 1113 or at [www.ico.org.uk](http://www.ico.org.uk)

*I consent for my data to be collected and used as described in this policy. This includes being contacted by the Hebridean Whale and Dolphin Trust and the app developer, Natural Apptitude, to, for example, verify my sightings and provide important updates relating to the project. I also understand that I may be contacted by email by Natural Apptitude if I request a new password or have technical difficulties and that my sightings data will be shared with other selected organisations for conservation purposes. I understand that I can withdraw my consent at any time by contacting [whaletrack@hwdt.org](mailto:whaletrack@hwdt.org).*

Last updated 13.11.2018





Hebridean  
Whale &  
Dolphin  
Trust

01688 302 620  
info@hwdt.org  
www.hwdt.org

Registered Scottish Charity No. SC022403  
Company Ltd by Guarantee No. SC172338

28 Main Street  
Tobermory, Isle of Mull  
PA75 6NU