



PRIVACY POLICY & GDPR COMPLIANCE STATEMENT Updated 15 May 2018



Along with our general terms of service, this policy explains how we collect and handle any data provided to us by supporters and visitors to the park. We will review and update this policy regularly in accordance with any changes or updates in privacy law and when our activities or practices change.

If we need to make any changes we will post the latest version here.

As one of our valued customers, we wanted to take the opportunity to inform you of your rights and the changes to data protection which take effect on the 25th of May 2018. The Data Protection Act (DPA) is being replaced by the General Data Protection Regulation (GDPR) and under the new rules, all supporters and visitors to Monkey World – Ape Rescue Centre are now allowed full control over any data we hold and how we use it.

For example, you may be one of our Adoptive Parents or have made a donation to the park for the benefit of our rescued monkeys and apes. If this is the case, we are likely to have your name, address, email address and telephone number on a database specific to the scheme that you are participating in. Please Note: This applies specifically to data that Monkey World – Ape Rescue Centre holds, if you are a charity member (Jim Cronin Memorial Fund) or participate in any of the Jim Cronin Memorial fund events or fundraising schemes please refer to their website www.jimcroninmemorialfund.org

PLEASE NOTE: All and any data that we hold *is* and has only **ever** been, used for the specific, explicit and legitimate purpose for which the data was originally collected for and not for any other purpose. Data of this nature is and always has been stored on a secure server and unlike many other organisations, we **do not** and **never have**, sold any of this information or data. At the current time we do not participate in and have not to date taken advantage of any information gained from google analytics, or used any of this data for marketing purposes and as such the information currently stored will only ever be used if we need to contact you to discuss a scheme that you are currently participating in or have enquired about.

We very much appreciate that you all have busy lives and as such, adoption renewals for example, can sometimes be renewed outside of, or past the original renewal date. We appreciate that it can be frustrating to have to repeat or re-input your full contact details every time you adopt, however this is the very best way to ensure that you are in control of your own data and under the new GDPR regulations we will no longer be in a position to keep personal data relating to the primate adoption scheme if a renewal does not take place within one calendar month of expiry, In this instance you will have no choice but to re-input your data and once processed you will be issued with a new adoption ID number. We apologise to our supporters for any inconvenience that this may cause but our priority is to ensure that your data is only held on our systems if you have given us explicit instructions to do so.

If however, you would prefer that we keep your details on file for ease of booking or taking part in our primate adoption scheme, please download and complete a copy of our OPT IN form (click [here](#)) or contact us to make the necessary arrangements.



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Aims of the GDPR

The GDPR regime includes all the existing principles regarding data protection and security but goes further. Individuals now have extended rights under the new regime and businesses now have greater responsibilities.

The new regulations are designed to protect individuals from modern issues, including:

Identity theft.

Nuisance calls.

Junk mail.

More control over how personal data is used.

Breaches of the GDPR are criminal offences and will result in severe penalties.

How did we prepare for GDPR?

To prepare for the new regulations and in addition to the staff training provided, Monkey World – Ape Rescue Centre, Ape Concessions Ltd and the Ape Rescue Trust carried out full and detailed audits of the processes and protections that were already in place, updating and revising as necessary and consideration was also given to how the existing systems are and will be monitored in the future.

Examples of the Questions and Considerations taken into account were:

How does the company gain consent and allow supporters or visitors to have control of what they consent to?

How can supporters or visitors withdraw consent?

How secure is our data?

What do we have in place relating to breach prevention and breach management?

What is the company's lawful basis for processing data?

What personal data do we hold?

In addition to the above considerations, we have also taken steps to review, consider and abide by the seven key principles of Data Protection as set out in the GDPR, namely:

Fair, Lawful & Transparent processing, the Purpose Limitation Principle, Data Minimisation, Accuracy, Data Retention periods, Data Security, and Accountability.



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Why and how do we use your personal data?

We will only ever use your information where you've given us your consent, i.e. where it is necessary to deliver the services you've requested, where it's necessary to exercise or comply with legal rights or obligations, or for normal business purposes of the kind set out in this policy.

What personal data do we collect?

Everyone who is either an Adoptive Parent or uses a mobility scooter for example, when visiting the park, or purchases goods or services from us will have the necessary and required information about them collected, stored and processed. However, we will never collect more information than we need.

How long do we store your personal data?

We only keep your data for as long as we need it, or are required to keep it for legal reasons. Unless we have received a signed and completed OPT IN form, any data held that does not relate to either of the reasons listed above will be deleted. We treat certain data differently depending on what it is used for, but you can ask us to delete your personal data at any time.

When is your information shared with or collected by third parties?

Monkey World – Ape Rescue Centre does share some of the data you provide (Name and Address) with a data processor, however this is only for the specific intention of providing you with the goods and services that you have paid for, for example – When you take out a primate adoption, one of the items that you are paying for and as such expect to receive is a copy of our newsletter, the Ape Rescue Chronicle. The ARC (Ape Rescue Chronicle) is sent out to all adoptive parents three times a year and in order to provide this service to you, we use an outside provider (Data Processor) Wyndeham Print. We have used the same company for many years now without issue and they are responsible for both the printing of and the mailing of the Ape Rescue Chronicle to you. Once this process has been completed for each mailing of the Ape Rescue Chronicle, Wyndeham Print have confirmed that the data is deleted. You can view their assurances on data protection [here](#).

Monkey World – Ape Rescue Centre, Ape Concessions Limited and The Ape Rescue Trust also use a second outside provider (Data Processor) in order to provide a further service to you related to the primate adoption scheme known as Ideal Forms/Clarity Mail Management. When your adoption is due for renewal, we will contact you to inform you of this by letter to the address you have provided us with. Ideal Forms/Clarity Mail Management are responsible for despatching the renewal letters to you, and use a fully automated and encrypted system to complete this process on a monthly basis. Once the process has been completed the data is immediately destroyed. If you do not wish to renew your primate adoption any data held at Monkey World and by the Ape Rescue Trust will be destroyed one calendar month after your renewal date and your adoption ID will no longer be valid. You can view their assurances on data protection [here](#).



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Visitors to the Park

We are incredibly grateful to everyone who visits the park, Income generated from our visitors enable us to continue our rescue and rehabilitation work.

We are proud to welcome visitors from all over the world and from all walks of life to the park, but in order to do so there are some instances whereby, in order to facilitate a some visit's we require certain data from you, for e.g. when arranging school or group visits, guided tours of the park as a further example the use of one of our mobility scooters during your visit. We have detailed below how this data is used and processed.

School and Group Bookings

To ensure the health, safety and wellbeing of any school or group booking participants, we need to take basic details from the organiser or operator. These details will include a name and address of the organisation, an email address and contact telephone number. This data is used for the explicit purpose intended only and is never shared with any third party. This data is used in some instances and where relevant to invite organisers or operators to the park in advance of their booking in order for example, to carry out necessary risk assessments prior to a visit or to contact organisers or operators to discuss their booking or to inform them of any problem or issue that may have an effect on any school or group booking made, or and finally for invoicing purposes.

Guided Tour Bookings

When you book a tour at Monkey World, we need to take some basic details to enable us to process the booking. This includes a name, contact number, email address and postal address. Data is held on our tour booking system which is stored on a secure server. This data is used for the explicit purpose intended only and is never shared with any third party. This data is used only to contact you to discuss your booking or to inform you of any problem or issue that may have an effect on any booking made.

Mobility Scooter Hire

Many visitors to the park require additional assistance with regards to mobility and we are pleased to be in a position to provide a number of mobility scooter's and wheelchairs for our disabled visitors use. We have strict Health, Safety and Training requirements which must be met in order for a visitor to use one of the parks mobility scooters or wheelchairs. Users will be required to provide personal data as part of user agreement and as such personal data to include your name, address, telephone number and email address are required. We will also require a form of personal ID for the purposes of security and identification of the user during your visit. We do not make a copy of any identification provided which is stored securely throughout your visit and returned to you when the mobility scooter or wheelchair is returned at the end of the day.



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First Aid

If you request or require First Aid for any reason during your visit, we will record your details for health and safety reasons. This information is requested from you personally and you are required to sign and confirm that you have received treatment or advice.

CCTV

For the safety, security and wellbeing of the parks primates, staff and visitors, the park uses CCTV throughout the park. This data is held securely at Monkey World and does not leave the site unless we are required to provide it for law enforcement matters. Images are never distributed or sold.

Data held for any of the above reasons is stored on a secure server and is not sold or distributed. You have the right to “be forgotten” or have your details deleted from our servers at any time.

Website

At the current time we do not use, record or apply any analysing technology to record or review any data as a result of visitors to the Monkey World website.

How do we keep your data secure?

Safeguarding your data is of the utmost importance to us and all data is held on secure servers, which are non-cloud based. In addition to this we regularly review the security in place by ensuring that:

- security software is installed correctly and regularly kept up to date
- by enforcing our policies and procedures
- by educating and the training of all staff
- by limiting access to only those Monkey World staff who have to come into contact with your information to do their jobs and deliver certain services

Unfortunately, no website or system can ever guarantee complete security but we have worked hard to create a companywide security programme which is designed to keep your data as safe as possible by using industry-standard encryption and a wide a range of technical, organisational and administrative security measures.



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Your Rights

You have the right to ask us for a copy of your personal data;

You have the right to correct, delete or restrict processing of your personal data;

You have the right to be forgotten.

You can also object to the processing of your personal data in some circumstances (in particular, where we do not have to process the data to meet a contractual or other legal requirement).

If you ask to withdraw your consent this will not affect any processing which has already taken place at that time.

These rights may be limited, however if fulfilling your request would either reveal personal data about another person, or if you ask us to delete information which we are required by law or have compelling legitimate interests to keep.

Contact Details - Data Controller - How you can contact us:

Monkey World – Ape Rescue Centre, Ape Concessions Ltd, Ape Rescue Trust. (Data Controller)
Longthorns, Wareham, Dorset. BH20 6HH

Telephone Number: 01929 401018 Email Address apes@monkeyworld.org



OPT IN FORM
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I Give my permission for my Name, Address, Telephone Number and Email address to be stored on Monkey World – Ape Rescue Centre’s main database.

Address:
.....

Postcode: Telephone No:

Email:

I understand that I have the right at any time to have my details removed from this database by contacting Monkey World – Ape Rescue Centre and requesting to be removed from the database.

I give my permission for Monkey World – Ape Rescue Centre and its associated companies, i.e. Ape Concessions Ltd and the Ape Rescue Trust to contact me via email / post (delete as applicable) to inform me of any new updates related to the companies work, events or fundraising schemes that may be of interest to me.

Signed Print Name

Date

Once completed, please return to: Monkey World – Ape Rescue Centre, Longthorns, Wareham, Dorset, BH20 6HH. Telephone Number: 01929 401018 Email: apes@monkeyworld.org



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London Road
Cobham
Essex CO3 0PJ

T: +44 (0)1206 987 270
E: enquiries@wyndeham.co.uk
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May 2018

Dear Client,

Re: Improved processing of your mailing lists

We are always seeking ways to improve our processes and the services we provide to our clients. In recent months we have been focusing on any improvements we can make to the way in which we handle your data and to ensure that we are both fully compliant with the new data protection legislation under the GDPR the General Data Protection Regulation.

We want to ensure that when processing mailing lists your customers and subscribers personal data receive the maximum protection available and to this end we have developed a new secure process which we encourage you to adopt.

This process relies upon using industry standard secure file transmission methods known as sFTP for you to transfer your files to us and onto our sFTP server. We will set up an account for you on our server and provide you with a unique login account and password solely for you to access our server. We recommend that you encrypt your mailing list file perhaps using ZIP file ready for its sFTP transfer and that you notify us that you have loaded the file, including providing the ZIP file password by separate email.

Our sFTP server is securely managed and by using rights management dictated by job roles only our authorised personnel will have access to your files in order to process the data.

In some cases we may use sub-processors to fulfil part of the processing. In such cases the sub-processors will be alerted by our customer service teams that your file is securely stored on our sFTP server and is ready for processing so that they can extract the file from our server using the same secure sFTP file transmission methods. In order to achieve this they will also be provided with a unique login account and password.

In order to ensure that personal data is not retained for any longer than necessary our server will automatically delete your file after an agreed period defined by you has expired.

We strongly recommend that you adopt this process and invite you to contact us to set up an account for you. Should you require any further information or help with this then please do not hesitate to contact your account manager.

Kind Regards,

Jon Hearnden
Group Sales Director
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Email: jonhearnden@wyndeham.co.uk

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ideal forms

CLARITY

MAIL MANAGEMENT



SECURITY FEATURES

Your documents are processed in our secure mailing facility. Accredited to ISO 27001 and fully compliant to the DataProtection Act, you can rest assured that your mail is being processed in a professional and confidential environment. We currently process thousands of documents every day for our blue chip client base.

CLARITY MAIL PRINTER DRIVER

DOCUMENT INTEGRITY

Documents are stored in the PDF/A file format. This ensures that all the resources which are required to produce the document, such as fonts and graphics, are stored with the document data at all times.

In addition to this, fulfilment metadata is also embedded into the document. This means that all the information which is needed to know how to fulfil the document is also carried with the document itself. Fulfilment information can include envelope type, stationery, inserts, colour print requirements and much more.

DOCUMENT SECURITY

The document, resources and metadata are encrypted to 192bit Triple DES. This ensures that regardless of the transmission method, the document remains secure.

The document is then transmitted from the Clarity Mail Printer Driver at the user's site to the Clarity MailManagement site. To add an additional layer of security, this transmission is carried out using a secure communication channel such as SFTP (FTP & local file copy are also available if transmission security is not a concern).

APPLICATION INTEGRITY

To prevent malicious behaviour within the client infrastructure, the Clarity Mail Printer Driver is digitally signed & obfuscated. This protects against application disassembly and allows system administrators to ensure only trusted applications are used.

CLARITY MAIL MANAGEMENT SITE

DOCUMENT SECURITY

Even when documents arrive at the Clarity Mail Management site, they remain stored in their encrypted form.

Documents are only decrypted for Web Portal viewing and Production Print purposes. This helps to ensure that we meet our strict ISO 27001 security levels.

WEB PORTAL

SYSTEM SECURITY

The Web Portal is a web facing application, as such security is of paramount importance. We have invested significantly in ensuring that the Web Portal is as secure as possible. A 3rd party security firm has been employed to perform penetration and security testing on the Web Portal. Following this activity, security accreditation for the Web Portal was awarded.

KEY THREATS & SECURITY MEASURES WHICH WERE TESTED:

- Support for secure communication (HTTPS)
- Open Web Application Security Project (OWASP) Top 10 threats
- The Web Application Security Consortium Top threats
- The Open Source Security Testing Methodology Manual Top threats
- SANS Common Weakness Enumeration TOP 25 threats



CLARITY MAIL MANAGEMENT DELIVERING POSTAL SAVINGS FOR BUSINESS MAIL

For more information on Ideal Post call Ideal Forms on 01202 474752 or email office@idealforms.co.uk

