

Privacy Impact Assessment

Reason for the PIA

The PIA is being conducted to confirm that the new Friends of Australian Wildlife Conservancy UK (FoAWC UK) website adheres to the local GDPR rules and regulations in the United Kingdom. While this new website will utilise the Content Management System (CMS) from the Australian Wildlife Conservancy (AWC), the management of customer data will be entirely independent from AWC, in order to comply with all local GDPR rules and regulations.

The New Processing Activity:

- **One way sharing of content:** The new FoAWC UK website will utilise the website copy and images from the AWC website, as this content will be “pushed’ from the AWC CMS to the FoAWC UK CMS
- **All customer data processed outside of the CMS:** The new FoAWC UK website will not store any customer data in the CMS. The data will be processed directly and securely into the UK payment gateway (Beacon) and email subscriber system (MailChimp) to avoid any potential data breach.
- **User permissions:** Users of the new Friends of Australian Wildlife UK website will not be able to access the Australian Wildlife Conservancy’s CMS or customer data in any way.
- **IP addresses and Cookies:** the FoAWC UK website will not store any IP addresses or cookies in the CMS.

Basis

The basis for collecting customer data via the FoAWC UK website, is to process donations through the website, and to add customers to the email subscription list if requested. Further information can be found in the FoAWC UK Terms of Use & Privacy Policy.

Upon donating to FoAWC, customers receive the following communications:

An automated acknowledgement of receipt generated from Beacon CRM.

A personalised email of thanks from the UK Philanthropy Lead.

Upon subscribing to FoAWC’s email newsletter, customers receive the following communications:

Emails with information containing news and updates about Australian Wildlife Conservancy, Friends of Australian Wildlife Conservancy, and invitations to UK-based functions.

FoAWC UK customer data is then used to:

Store in Beacon CRM for relationship building and communication with donors.

Collection and processing of customer data is limited:

- Name
- Address

- Email
- Phone number
- Subscriber status
- Gift Aid declaration (if applicable)

Risk

The FoAWC UK website will utilise content from the AWC website, through a connected CMS that allows content sharing (WordPress Multisite). The potential risk would be if any customer data were shared between AWC and FoAWC UK, given that these organisations are subject to different GDPR regulations. This risk has been thoroughly considered in the project plan, and has been accounted for.

Mitigation of risk

The following steps have been taken to avoid any customer data being shared between AWC and FoAWC UK, and therefore remaining GDPR compliant for each local website:

1. **Customer data storage** – no customer data of any sort will be stored in the FoAWC UK CMS (WordPress). All customer data will pass straight past WordPress to be processed and stored in the FoAWC UK's local payment platform (Beacon) and email platform (Mailchimp).
2. **User permissions** – users of the UK website will have access to the FoAWC UK WordPress, but will not have any access to AWC's WordPress system.
3. **IP Adresses and Cookies** – no IP addresses or Cookies will be stored in the CMS for FoAWC UK.

Conclusion

In conclusion, we believe that the new websites for AWC and FoAWC UK will remain compliant with local privacy laws and GDPR. Customer data for each organisation will be managed entirely separately, to ensure that neither organisation is breaching their local regulations.



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