

Privacy Notice - Halkirk District Benefit Fund

Introduction

Welcome to the Halkirk District Benefit Fund's privacy policy.

We respect your privacy and are committed to protecting your personal data. This privacy policy will inform you as to how we look after your personal data when you visit our website, use our Facebook page or make an application for funding/become a member.

1. Important information and who we are

Purpose of this privacy policy

This privacy policy aims to give you information on how we collect and processes your personal data. It is important you read this privacy policy so that you are fully aware of how and why we may use your data.

Controller

We are a controller of personal data and therefore have responsibilities. We have appointed a data privacy manager, who is responsible for overseeing questions in relation to this privacy policy. If you have any questions, including any requests to exercise your legal rights, please contact the data privacy manager using the details set out below.

Contact details:

Full name of legal entity: Halkirk District Benefit Fund

Name of data privacy manager: Mrs Sylvia Reilly

Email address: sechdbf99@yahoo.com

Postal address: Loanscorribest, Milton, Reay, Thurso, KW14

Changes to the privacy policy and your duty to inform us of changes

This privacy policy was last updated in May/June 2018 and may be updated in the future, as necessary. It is important that the personal data we hold about you is accurate and up to date. Please keep us informed if your personal data changes during your relationship with us.

Third-party links

This website does not include any links to third-party websites, plug-ins and applications. Generally speaking, our Facebook page will not do so either. Clicking on any links there may be, or enabling any connections, may allow third parties to collect or share data about you. We do not control any third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy policy of every website you visit.

2. The data we collect about you

Personal data, or personal information, means any information about an individual from which that person can be identified. We may collect, use, store and transfer different kinds of personal data about you and/or

any organisation you represent. Such information will generally be restricted to identity and contact information, provided whilst applying for membership/making an application for funds. In the case of organisations, making any applications for funds, it may also include; financial/banking, accounting or other record keeping/entity structure information. Not all of this type of information will be personal data but some of it may be (or may contain such information).

We do not collect any Special Categories of Personal Data about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health, and genetic and biometric data). Nor do we collect any information about criminal convictions and offences.

You must be at least 18 years old to become a member and therefore make any relevant application for funding. We accept applications by parents, or other adults with relevant authority, relating to the activities of children in various fields. We may ask for/be provided with certain basic information about that child, such as their name and age (but not date of birth), but otherwise the application will focus on the broad reasons for the application. Otherwise, we do not hold/process any personal data relating to children.

If you fail to provide personal data

Where we need to collect personal data to (for example) process membership / funding applications and you fail to provide the data when requested, we may not be able to perform the effective membership contract we have, or are trying to, enter into with you. Personal data will principally be collected through the membership and funding application processes.

3. How we use your personal data

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- Where we need to perform the effective membership contract we have, or are trying to, enter into with you.
- Where we have your appropriate and valid consent, in pursuance of your membership or any application for funding (on your own, or your organisation, behalf).
- Where we have a legitimate interest toward the benefit of the community, including the administration of the fund (and such interest is not outweighed by any rights and interests of your own).

Purposes for which we will use your personal data

We are a community fund which allows applications to be made, subject to membership. Generally speaking, we will process your information when assessing any application for membership or funding. We will otherwise retain your information to effectively communicate with you. We do this by the production of newsletters, which keep members up to date on our work and the allocation of funds. Members will also be invited to the Annual General Meeting.

Third-party marketing

We will get your express opt-in consent before we share your personal data with any third party for marketing purposes. Third party marketing is not something we do and currently have no intentions of commencing such activities.

Cookies

We do not use cookies on our website or Facebook page.

Change of purpose

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider we need to use it for another reason and this is compatible with the original purpose. If we need to use your personal data for an unrelated purpose, we will notify you and will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

4. Disclosures of your personal data

We may share your personal data with certain parties, including the Trustees and any independent examiner(s) but only for the purposes necessary to determine membership volume and to scrutinise our work, including the assessment of applications/allocation of funds. Being a registered charity, which handles a fund, there are certain legal, accounting and regulatory compliance requirements.

We require any such third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow third parties to use your personal data for other purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions/their professional obligations.

5. Data security

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those who have an administrative, or other, need to know. They will only process your personal data as instructed and they are subject to a duty of confidentiality. We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so. We do not transfer your personal data outside the European Economic Area (**EEA**).

6. Data retention

How long will you use my personal data for?

We will only retain your personal data for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements.

To determine the appropriate retention period for personal data, we consider the amount, nature and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal, regulatory, tax, accounting or other requirements.

We shall also endeavour to keep the membership list as up to date as possible which may, on certain occasions, involve destroying data of individuals who have (for example) moved out of area and can no longer be members.

7. Your legal rights

Under certain circumstances, you have rights under data protection laws in relation to your personal data, as follows;

- *Request access to your personal data.*
- *Request correction of your personal data.*
- *Request erasure of your personal data.*
- *Object to processing of your personal data.*
- *Request restriction of processing your personal data.*
- *Request transfer of your personal data.*
- *Right to withdraw consent.*

If you wish to exercise any of these rights, or would wish further information, please contact our data privacy manager.