



## Sunart Community Company

### Privacy Policy

The Sunart Community Company takes your privacy seriously. We are a “controller” of the personal information that you provide to us and this privacy notice sets out how, why and for how long we will use your personal data, as well as who it is shared with. It also explains your legal rights as a data subject and how to exercise them.

#### What we need from you

When you register as a member of SCC (which includes “Friends of Sunart’s Coast and Water”) or renew your Membership, or participate in an event or project, we may ask you for, or you may provide us with, some or all of the following personal information:

- Contact details – e.g. name, address, email address and phone number.
- Equality information – sex, gender, disability, ethnic group and religion.
- Safety and emergency details – e.g. next of kin, relevant health conditions, dietary requirements.

If you do not provide us with all of the personal information that we need this may affect our ability to offer you our membership services and benefits.

#### Why we need your personal information – contractual purposes

We need to collect our Members’ and Stakeholders’ personal information so that we can manage your relationship with us. We may use our Members’ personal information to:

- Provide you with core member services, including confirmation of membership, end of year renewal or to send you news items.
- Organise SCC activities and manage risk and safety if you attend an event.

#### Why we need your personal information – legitimate purposes

We also process our stakeholders’ and members’ personal information in pursuit of our legitimate interests to:

- Provide you with news and updates about the activity of the SCC, opportunities to get involved in SCC training, general meetings, or other events.
- Raise awareness of the SCC’s activities by capturing photos, videos, or live streaming at events. We will use this for promotion, education and development purposes.
- Respond to and investigate your questions, comments, support needs, complaints, concerns or allegations.
- Surveys for evaluation or research - collected when organisation provides data or database at the point of collection and retained indefinitely for reporting/historical/statistical purposes.
- Images – collected at events, the point of collection and may be used on website or reporting to funders and shall be retained indefinitely for reporting/historical/statistical purposes.
- Reporting for funders – collected during charitable activities and shared indefinitely for reporting/historical/statistical purposes.



### **Why we need your personal information – legal obligations**

We are under a legal obligation to process certain personal information relating to our members and customers for the purposes of complying with obligations under:

- The Equality Act 2010, which requires us to process personal information to make reasonable adjustments where necessary. We use aggregated and anonymised reports of our members' and stakeholders' personal information for equality monitoring purposes, enabling us to evaluate and promote equality of opportunity within our activities.
- Staff administration – collected when staff are recruited at the point of collection and is updated when changes to staff and/or data and shall be retained for 7 years after the employment ends.
- The Charities and Trustees Investment (Scotland) Act 2005, which requires us to maintain a register of members, including name, address, date admitted to membership and date on which Membership ceased, to hold general meetings, issue notices and AGM voting arrangements.
- Company law compliance - collected when directors join the board and point of collection and amended when there are any changes to the board. For company regulation, these details are show on the public record on Companies House. These records shall be retained for 6 years following the end of the directorship.
- Charity law compliance - collected when trustees join the board and at the point of collection and amended when there are changes to the board. These details may be requested by/disclosed to a member of the public as this is a statutory requirement.

### **Other uses of your personal information**

We may ask you if we can process your personal information for other purposes. Where we do so, we will provide you with an additional privacy notice explaining how we will use your information for these purposes. For example,

- Sunart Moorings Holders details are generally passed to Crown Estate Scotland as part of our annual reporting requirements, for which we will ask your permission.
- Individuals who sign a petition (for example to support a community buy-out of a property) will have their details passed to the relevant government body as proof of support for the petition.

### **Who we share your personal information with**

We may also share personal information with professional and legal advisors for the purpose of obtaining advice. We will not pass your personal information to any other charity or commercial organisation for promotional, advertising, or fundraising purposes.

### **Third party suppliers with access to members' and customers' personal data**

The SCC may use third party suppliers to provide services. These suppliers may process personal data on our behalf as "processors" and are subject to contractual conditions to only process that personal information under our instructions and protect it. In the event that we share personal information with external third parties, we only share such information strictly required for the specific purposes and take reasonable steps to ensure recipients shall only process the disclosed personal information in accordance with those purposes. For example:

- Our accountant receives copies of paperwork (e.g. travel and subsistence claim forms) whilst producing our annual accounts.



- Our website and social media hosts process enquiries and sign-ups

### **How we protect your personal information**

Your personal information is accessed by relevant staff members and Directors only for the purposes set out above. It is stored by the SCC in password protected computers and locked filing cabinets.

### **How long we keep your personal information**

We only keep your personal information for as long as necessary to meet our statutory requirements and provide you with membership services. Unless you ask us not to, we will review and delete your personal information where you have not renewed your membership with us for 3 years.

### **You have a right to:**

Unless subject to an exemption under the GDPR, you have the following rights with respect to your personal data: -

- The right to request a copy of your personal data which we hold about you;
- The right to request that we correct any personal data if it is found to be inaccurate or out of date;
- The right to request your personal data is erased where it is no longer necessary for us to retain such data;
- The right to withdraw your consent to the processing at any time;
- The right to request that we provide the you with his/her personal data and where possible, to transmit that data directly to another data controller, (known as the right to data portability), (where applicable).
- The right, where there is a dispute in relation to the accuracy or processing of your personal data, to request a restriction is placed on further processing;
- The right to object to the processing of personal data, (where applicable);
- The right to lodge a complaint with the Information Commissioners Office

### **Further processing**

If we wish to use your personal data for a new purpose, not covered by this Data Protection Notice, then we will provide you with a new notice explaining this new use prior to commencing the processing and setting out the relevant purposes and processing conditions.

Where and whenever necessary, we will seek your prior consent to the new processing.

### **Contact Details**

To exercise all relevant rights, queries of complaints please in the first instance, contact us **by email:** [enquiries@sunartcommunitycompany.org.uk](mailto:enquiries@sunartcommunitycompany.org.uk)

**or by post to:** SCC Secretary, Craig Ard, 5 Longrigg Rd, Strontian, PH36 4HY