



## DATA PRIVACY POLICY

**Updated:** 23rd May 2018

**Data controller:** Scottish Rural Action

### Introduction

This policy gives details of the personal data Scottish Rural Action holds about people, why we hold it and what we do with it. We seek to ensure that your data remains private, used only for the purposes for which you submitted the data, and is retained only for as long as it is reasonably required.

### Personal data

Personal data relates to individuals and is defined as:

- Names
- Addresses
- Social Security details
- Photos
- Email addresses
- Banking information
- Social media posts
- Medical information
- IP addresses

### What we do with your data

We use your personal data to maintain records we are legally obliged to keep, such as membership records, or to contact you about our work and related activities, such as rural policy and events. We do not pass your personal data on to third parties unless we are legally required to do so or have your active consent to do so.

### What personal data we keep, why and for how long

We hold the following personal data for different groups of people:

Who	Information held	Reason	When is data deleted?
Members	Details as completed on the application form (online or on paper) including name, address, email and local authority area.	It is a legal requirement to hold data about our members.	Two years after a member resigns.
Newsletter subscribers	Name and email address.	Contact members and other interested parties about our work and related activities.	If a subscriber chooses to unsubscribe.

Website subscribers	Name, email address and any other details you choose to input e.g. photo.	To enable people to keep a profile on our website and contribute to our forum.	If a subscriber chooses to unsubscribe.
Survey respondents	Name, email address and any other details you choose to input.	Contact respondents about the survey results.	One year after the survey is completed.
Event participants	Name and contact details. Photography and film taken at events.	Contact participants about the event and keep a record of events.	Three months after the event has taken place, unless you have given us permission to take and keep images.

HR data is kept for a period of at least 6 years following the termination of employment and Health and Safety information must be held for a minimum of 40 years.

### **Your rights**

Unless subject to an exemption under the General Data Protection Regulation 2016/679, you have the following rights with respect to your personal data: -

- The right to request a copy of your personal data which Scottish Rural Action holds about you;
- The right to request that Scottish Rural Action corrects 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 Scottish Rural Action to retain such data;
- The right to withdraw your consent to the processing of your personal data by Scottish Rural Action at any time;
- The right to request that Scottish Rural Action provide the data subject 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;
- The right to know how personal data will be protected if it is to be transferred to countries or territories outside the EU.

### **Legal basis for processing information**

There are a number of reasons that organisations are allowed to process data. Scottish Rural Action processes data for the following reasons:

(a) Consent: the individual has given clear consent for you to process their personal data for a specific purpose.

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(b) Contract: the processing is necessary for a contract you have with the individual, or because they have asked you to take specific steps before entering into a contract.

(c) Legal obligation: the processing is necessary for you to comply with the law (not including contractual obligations).

(d) Legitimate interests: the processing is necessary for your legitimate interests or the legitimate interests of a third party unless there is a good reason to protect the individual's personal data which overrides those legitimate interests.

### **Contact details**

If you have any queries or concerns about the personal data processing carried out by Scottish Rural Action, then you should contact [info@sra.scot](mailto:info@sra.scot).