



SCRT

SCOTTISH COMMUNITY RE:INVESTMENT TRUST
Re:Investing in Scottish communities.

SCRT Privacy Policy

Your personal data – what is it?

Personal data relates to a living individual who can be identified from that data.

Identification can be by the information alone or in conjunction with any other information in the data controller's possession or likely to come into such possession. The processing of personal data is governed by the General Data Protection Regulation 2016/679 (the "GDPR")

Who are we?

Scottish Community Re: Investment Trust(SCRT) is the data controller (contact details below). This means it decides how your personal data is processed and for what purposes.

How do we process your personal data?

- SCRT complies with its obligations under [the GDPR] by keeping personal data up to date;
- by storing and destroying it securely;
- by not collecting or retaining excessive amounts of data;
- by protecting personal data from loss, misuse, unauthorised access and disclosure and;
- by ensuring that appropriate technical measures are in place to protect personal data

We use your personal data for the following purposes:

- To enable us to provide our charitable activities for the benefit of the public as specified in our constitution;
- To fundraise and promote the interests of the charity;
- To maintain our own accounts and records;
- To operate our web site and deliver the services that individuals have requested;
- To inform individuals of news, events, activities or services run by SCRT.

What is the legal basis for processing your personal data?

Article 6 processing:

- Consent of the data subject for photographs to be taken for marketing purposes and processing data for event management.
- Processing is necessary for the performance of a contract with the data subject or to take steps to enter into a contract in relation to reporting to funders on activities which may include case studies and images;

- Processing is necessary for compliance with a legal obligation in relation to the charity and company law requirements;
- Processing is necessary for the legitimate interests of the data controller or a third party, except where such interests are overridden by the interests, rights or freedoms of the data subject.
- In relation to the **SCRT monthly bulletin focusing on Social Finance, Social Investment and the Scottish third sector**. It is necessary for us to process contact details for this purpose, and the mailing is a proportionate way of approaching individuals to connect and inform about activities and policy developments happening across the community sector. We have considered that the nature of the data being processed is names, email addresses and where appropriate the name of the organisation, and that it would be reasonable for these individuals to expect that they may receive these mailings. We have determined that the impact is likely to be minimal however as there is a clear opt out procedure if they no longer wish to receive the monthly bulletins.

Article 9 Processing:

- Processing is carried out by a not-for-profit body and the processing relates only to members or former members and subscribers (or those who have regular contact with it in connection with those purposes); and there is no disclosure to a third party without consent.

Sharing your personal data:

Your personal data will be treated as strictly confidential, and will be shared only with:

- Funders, where necessary.
- IT company for maintenance and repair.

We will only share your data with third parties outside of the organisation with your consent.

How long do we keep your personal data?

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

- 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.
- 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.
- Events – collected when event is marketed at the point of collection and delegate lists are provided on day of event and these are retained indefinitely for historical/statistical purposes.
- Fundraise and raise awareness of charitable work – collected at the point of contact with the data subject and shall be retained indefinitely for reporting/historical/statistical purposes.
- Monthly bulletin – collected when individuals subscribe at the point of collection and this shall be held until subscriber unsubscribes or the bulletin ceases.
- Surveys for evaluation or research - collected when organisations or individuals 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.

Your rights and your personal data:

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 found to be inaccurate or out of date.
- The right to request your personal data is erased where 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 your personal data and where possible, and where applicable. to transmit that data directly to another data controller, (known as the right to data portability).
- 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 Information Commissioner's Office - Scotland

45 Melville Street

Edinburgh

EH3 7HL

Telephone: 0303 123 1115

Email: Scotland@ico.org.uk

Transfer of Data Abroad:

When we process data, it is in electronic format and if it ever needs to be transferred to countries or territories outside the EU, it will be done so on the basis that anyone to whom we pass it protects it in accordance with applicable laws and your personal information receives an adequate level of protection in a way that is consistent with and which respects the EU and UK laws.

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 or complaints please in the first instance, contact us at:

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Re:Investing in Scottish communities.