

PRIVACY POLICY



PORT SETON CENTRE MANAGEMENT COMMITTEE

The Port Seton Centre Management Committee will protect and respect your privacy.

This Policy explains when and why we collect personal and sensitive (where necessary) information about people who use our services, who make payments; donate and fundraise for us. The policy details how we use your information, how we keep it secure and the conditions under which we may disclose it to others.

Our legal basis for processing personal and sensitive data is by Consent and Legitimate Interest: Article 6(1)(a) Consent, 6(1) (b) Contractual and special category (sensitive data) Article under 9(2) (d) of General Data Protection Regulation

Any questions regarding this Policy and our privacy practices should be sent by email to portsetoncentremancom@gmail.com in writing to Janice Thomson, Chair, Port Seton Centre Management Committee, Port Seton Centre, South Seton Park, Port Seton EH32 0BG. Alternatively, you can telephone 01875 818181.

Section 1: Who are we?

We're an independent, community-based charity responsible for managing the lettable space within the Port Seton Community Centre. With the income gained for short term lets of the Centre we are able to offer grants to community groups within the Port Seton and Cockenzie area. We work closely with East Lothian Council whose staff undertake the day to day operational work of the charity. The Port Seton Centre Management Committee is a registered charity (No. SC041476).

Notification

Our data processing activities will be registered with the Information Commissioner's Office (ICO) as required of a recognised Data Controller. Details are available from the ICO: The Information Commissioner's Office – Scotland, 45 Melville Street Edinburgh, EH3 7HL. Telephone: 0303 123 1115. Email: Scotland@ico.org.uk <https://ico.org.uk/about-the-ico/what-we-do/register-of-data-controllers/>

Changes to the type of data processing activities being undertaken shall be notified to the ICO and details amended in the register. Breaches of personal or sensitive data shall be notified immediately to the individual(s) concerned and the ICO.

Section 2: Personal and Sensitive Data:

All data (information) within the Port Seton Centre Management Committees control shall be identified as personal, sensitive or both to ensure that it is handled in compliance with legal requirements and access to it does not breach the rights of the individuals to whom it relates.

The definitions of personal and sensitive data shall be as those published by the ICO for guidance: <https://ico.org.uk/for-organisations/guide-to-data-protection/key-definitions/>

The principles of the General Data Protection Regulation (GDPR) shall be applied to all data processed:

- processed fairly and lawfully;
- obtained only for lawful purposes, and is not further used in any manner incompatible with those original purposes;
- accurate and, where necessary, kept up to date;
- adequate, relevant and not excessive in relation to the purposes for which it is processed;
- not kept for longer than is necessary for those purposes; processed in accordance with the rights of data subjects under the GDPR;
- protected by appropriate technical and organisational measures against unauthorised or unlawful processing and against accidental loss, destruction or damage;
- not transferred to a country or territory outside the European Economic Area unless that country or territory ensures an adequate level of protection of the personal information

Fair Processing / Privacy Notice:

We shall be transparent about the intended processing of data. Notifications shall be in accordance with ICO guidance and, where relevant, be written in a form understandable by those defined as 'Children' under the legislation.

<https://ico.org.uk/for-organisations/guide-to-data-protection/privacy-notices-transparency-and-control/>

The intention to share data relating to individuals to an organisation outside of our organisation shall be clearly defined within notifications and details of the basis for sharing given. Data will be shared with external parties in circumstances where it is a legal requirement to provide such information.

Any proposed change to the processing of individual's data shall first be notified to them.

How do we collect information from you?

We obtain information about you when complete forms to book accommodation or apply for grants become a Trustee of the Charity or volunteer in another way.

Why we collect information

Information is collected on Accommodation Booking Forms, for functions, casual, extended lets and birthday parties. To secure a let we require to know your name, address and contact details. Community Grant Forms also ask for name, address and contact numbers and bank details of any group you may be representing. We need you to provide us with this information as this enables us to assess your individual suitability for accessing our accommodation and or funds.

Section 3: Your Rights

You should ensure that the information we collect and hold in relation to you is accurate and kept up to date. If you would like to review the information we have collected on you at any time, please see contact below. You also have the right to have the information erased if we do not have a legitimate reason for retaining same. We will accede to any such valid requests within 30 calendar days of the receipt of a valid request in writing. Please note In order to adhere to our legal requirements the recommended minimum retention periods for charitable financial

record keeping is 6 years. Your information will be anonymised and archived after 1 year and destroyed after a period of 6 years.

You have the right to be given a copy of information held by us about you. We will provide the requested information to you within 30 calendar days of the receipt of a valid request in writing. We might request that you to provide additional information to enable us to identify your personal data and/or to verify your identity. Please send all requests to contact person below.

Section 4: What type of information is collected from you?

The personal information we collect will include your name, address, telephone number (landline & mobile) and email address. Payment and/or donation information is collected by us, and electronic payments (Card Payments) may be collected by our third party payment processors, who specialise in the secure processing of credit/debit card transactions.

How is your information used?

We may use your information to:

- assist in providing you with access to our accommodation
- assist you in making applications for grants
- process any donation that you may make;
- process any payment for services
- seek your views or comments on the services we provide;
- notify you of changes to our services;

We review our retention periods for personal information on a regular basis. We are legally required to hold some types of information to fulfil our statutory obligations (for example OSCR for charity operations, HMRC for potential gift aid) We will hold your personal information on our systems for as long as is necessary for the relevant activity, or as long as is set out in any relevant consent you hold with us.

Section 5: Who has access to your information?

We will not sell or rent your information to third parties. We will not share your information with third parties for marketing purposes.

Section 6: Security

We endeavour to use industry standard data security measures to protect your information and to prevent the loss, misuse or alteration of any information in our control. However, the transmission of information via the internet is not completely secure and we cannot guarantee that all of your private communications and other personally identifiable information will never be disclosed. However, we will use our reasonable endeavours to ensure that such information is kept as secure as possible.

How you can update your information

The accuracy of your information is important to us. If you change your address, and/or email address, or any of the other information we hold is inaccurate or out of date, please email us at: portsetoncentremacom@gmail.com, or write to the Chairperson, Port Seton Centre Management Committee, Port Seton Centre, South Seton Park, Port Seton, East Lothian EH32 0BG.

Security precautions in place to protect the loss, misuse or alteration of your information

In order to assure the protection of all data being processed and inform decisions on processing activities, we shall undertake an assessment of the associated risks of proposed processing and equally the impact on an individual's privacy in holding data related to them.

Security of data shall be achieved through the implementation of proportionate physical and technical measures. Charity Trustees shall be responsible for the effectiveness of the controls implemented and reporting of their performance.

The security arrangements of any organisation with which data is shared shall also be considered and these organisations shall provide evidence of the competence in the security of shared data.

When you give us personal and or sensitive information, we take steps to ensure that it's processed and retained securely. All personal and sensitive information is stored securely in paper or electronic form. Appropriate technical and organisational measures are taken against unauthorised or unlawful processing of personal and sensitive data and against accidental loss or destruction of, or damage to personal and sensitive data. Only authorised Port Seton Centre Management Committee Trustees and East Lothian Council Staff can access, alter, disclose or destroy personal and sensitive data.

Non-sensitive details (your email address etc.) are transmitted normally over the Internet, and this can never be guaranteed to be 100% secure. As a result, while we strive to protect your personal information, we cannot guarantee the security of any information you transmit to us, and you do so at your own risk. Once we receive your information, we make our best effort to ensure its security on our systems.

Photographs and Video

Images of Trustees, Council Staff, volunteers may be captured at appropriate times and as part of centre activities for use in the Management Committee's promotional and marketing material for use on our website, reports and publications.

Unless prior consent is provided from Trustees, Council Staff, volunteers and Centre users has been given, the Port Seton Centre Management Committee shall not utilise such images for publications or communications.

Data Disposal

The Port Seton Centre Management Committee recognises that the secure disposal of redundant data is an integral element to compliance with legal requirements and an area of increased risk.

- All data held in any form of media (paper, tape, electronic) shall be disposed of using secure disposal procedures.
- All data shall be destroyed or eradicated to agreed levels meeting recognised national standards, with confirmation at completion of the disposal process.
- Disposal of IT assets holding data shall be in compliance with ICO guidance: https://ico.org.uk/media/for-organisations/documents/1570/it_asset_disposal_for_organisations.pdf.

Children

We are concerned to protect the privacy of children. We welcome grant applications from those aged under 16 and recognise that further responsibilities lie with us to keep information regarding children safe and secure. We would seek to obtain parental consent to the processing of information for children who are under the age of 13, and make reasonable efforts (taking into account the available technology and risks inherent in the processing) to verify that the person providing consent holds parental responsibility for the child.

Transferring your information outside of Europe

As part of the services offered to you through this website, the information which you provide to us may be transferred to countries outside the European Union ("EU"). By way of example, this may happen if any of our servers are from time to time located in a country outside of the EU. These countries may not have similar data protection laws to the UK. By submitting your personal data, you're agreeing to this transfer, storing or processing. If we transfer your information outside of the EU in this way, we will take steps to ensure that appropriate security measures are taken with the aim of ensuring that your privacy rights continue to be protected as outlined in this Policy. If you use our services while you are outside the EU, your information may be transferred outside the EU in order to provide you with those services.

Review of this Policy. *We keep this Policy under regular review. This Policy was last updated on 21/05/2018*