



Data Privacy Policy for Service Users

Introduction

The UK General Data Protection Regulation (UK GDPR) entered into force in the UK in 2018, repealing previous Data Protection Acts. This Policy describes how we collect, use and process your personal data, and how, in doing so, we comply with our legal obligations to you according to the UK GDPR 2018 Regulations.

Your privacy is important to us, and we are committed to protecting and safeguarding your data privacy rights. This Data Privacy Policy applies to data processed by or on behalf of Tiree Community Development Trust (the Trust) and lets you know what happens to your personal data that you give to us or any that we may collect from or about you.

This Policy explains

- Who we are and how we use your information
- What kinds of personal information about you that we process
- What the legal grounds are for our processing of your personal information (including when we share it with others)
- Retention of your personal information
- What your rights are under data protection laws

How we use your information and the law.

Service users may be asked for specific information when applying to various funds or services, for example:

- The Windfall Fund
- Youth Services
- EPC's
- Citizens Advice Service
- Cruas Project Initiatives
- Croft Camping
- Tiree Broadband
- Fuel Accounts

For the purpose of applicable data protection legislation, the organisation responsible for your personal data is Tiree Community Development Trust (the Trust) and is referred to as the 'Data Controller'.

Upon commencement of service use, the Trust may ask you to supply personal information for example:

- Name, address, telephone numbers, email address
- Date of birth
- Emergency contact information
- Health information.
- Financial information



The information that we ask you to provide to us is required for the following reasons:

- To provide you with a service
- To provide you with company information
- To have the ability to contact your emergency contacts if necessary
- To ensure we are able to inform the emergency services if someone's health is compromised
- To ensure that we can provide any reasonable adjustments to a service as necessary

How do we lawfully use your data?

We need to know your personal, sensitive and confidential data in order to provide a service to you.

Under the General Data Protection Regulation we will be lawfully using your information in accordance with Article 6, (b) Necessary for performance of/entering into contract (or relationship) with you.

How do we maintain the confidentiality of your records?

We are committed to protecting your privacy and will only use information collected lawfully in accordance with:

- Data Protection Act 2018
- The UK General Data Protection Regulations 2016
- Human Rights Act 1998
- Common Law Duty of Confidentiality (Scotland)
- The Trust Information Security and Records Management

We will not disclose your information to any third party without your permission unless there are exceptional circumstances where the law requires information to be passed on (for example, emergency services).

Our policy is to respect the privacy of our service users and to maintain compliance with all UK specific Data Protection Requirements. Our policy is to ensure all personal data will be protected.

Where do we store your information?

All data captured by us on paper is scanned in to our computer system to create an electronic file and the original paper copy destroyed by shredding within 28 days, by the member of Trust Staff responsible for capturing it.

All electronic data (for example, digital photographs and videos) are also copied to our secure server and the original files deleted on the equipment used to capture by the member of the Trust Staff responsible for capturing them within 28 days.

All the personal data we hold is processed and stored on a secure server.

No 3rd parties have access to your personal data unless the law allows them to do so and appropriate safeguards have been put in place.



We have a Data Protection and Security regime in place to oversee the effective and secure processing of your personal and/or special category (sensitive, confidential) data.

Who are our partner organisations?

We may also have to share your information, subject to strict agreements on how it will be used, for example, with the following organisations:

- Local Authorities
- Disclosure Scotland
- OSCR (Office of Scottish Charity Regulator)
- Funders

You will be informed who your data will be shared with and in some cases asked for consent for this to happen when this is required.

We may also use external companies to process personal information. These companies are bound by contractual agreements to ensure information is kept confidential and secure.

How long will we store your information?

We are required under UK law to keep your data no longer than is reasonably required. If you discontinue use of our services, we will delete all of your data within 28 days.

How can you access, amend, move the personal data that you have given to us?

Even if we already hold your personal data, you still have various rights in relation to it. To get in touch about these, please contact the Trusts General Manager in writing.

We will seek to deal with your request without undue delay, and in any event in accordance with the requirements of any applicable laws. Please note that we may keep a record of your communications to help us resolve any issues which you raise.

Right to object

If we are using your data because we deem it necessary for our legitimate interests to do so, and you do not agree, you have the right to object in writing to the Trusts General Manager. We will respond to your request within 30 days (although we may be allowed to extend this period in certain cases).

Generally, we will only disagree with you if certain limited conditions apply.

Right to withdraw consent:

Where we have obtained your consent to process your personal data for certain activities (for example for a research project), you may withdraw your consent at any time.

Right to erasure

In certain situations (for example, where we have processed your data unlawfully), you have the right to request us to "erase" your personal data. Please contact the Trusts General

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Tiree Community Development Trust



Manager in writing. We will respond to your request within 30 days (although we may be allowed to extend this period in certain cases) and will only disagree with you if certain limited conditions apply.

If we do agree to your request, we will delete your data.

Access to your personal information

Data Subject Access Requests (DSAR): You have a right under the Data Protection legislation to request access to view or to obtain copies of what information this organisation holds about you and to have it amended should it be inaccurate.

To request this, you need to do the following:

- Your request should be made in writing to the Trust General Manager
- There is no charge to have a copy of the information held about you
- We are required to respond to you within one month.

What should you do if your personal information changes?

You should tell us so that we can update our records - please contact your Tiree Trust key contact/liaison person as soon as any of your details change.

Objections/Complaints

Should you have any concerns about how your information is managed, please contact the General Manager.

If you are still unhappy following a review by the organisation, you have a right to lodge a complaint with the UK Supervisory Authority as below.

Information Commissioner:
Wycliffe House, Water Lane
Wilmslow
Cheshire SK9 5AF

Tel: 01625 545745

www.informationcommissioner.gov.uk

Contact Us

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