

# Privacy Policy

## Overview

West Stormont Woodland Group (WSWG) has a statutory responsibility in law for protecting and securing personal information at all times. We aim to ensure that personal details are processed in a fair, open, and transparent way. We retain full compliance with the Data Protection Act 2018 - General Data Protection Regulation (GDPR), where WSWG is designated under this legislation is a “Controller” of personal data. This means we are responsible for controlling the processing of all personal information data systems in a secure and confidential manner.

For details about how we process personal information, associated rights of access and the measures we take to protect personal details, please read this policy or contact us via:

- West Stormont Woodland Group, Kinclaven, Stanly, Perth and Kinross, PH1 4QJ
- Email: [contact@weststormontwoodlandgroup.scot](mailto:contact@weststormontwoodlandgroup.scot)

## 1. How we collect information

How we collect information is primarily guided by the purpose for which it is used. Our primary reasons for requesting personal information are:

- To provide a service that is in-line with the objectives of WSWG as a charity involving responding to the identified beneficiary needs of the community and creating opportunities for participation.
- To maintain updates related to news and developments about our charity and the services it provides.
- Seeking support for WSWG community initiatives, campaigns, donations and fundraising.
- For contract or legally binding arrangement where personal information is required to fulfil this work.

The principal ways we collect personal information are:

### Direct Contact

When interaction takes place directly with WSWG. This could be when getting in touch to enquire about services we can offer, how we can provide help, support from the community we may need, or if WSWG can signpost and provide advice. This communication could be via emailing, direct phone calls, writing to us, contacting us through our websites or social media, or any other media which could be categorised as direct contact.

### Third Party Contact

Interaction via a partner or third party agency that WSWG works closely with. This could be via a services referral from a statutory organisation or other organisation where personal details have been consented for referral to WSWG. It also encompasses situations such as providing a donation through a third party such as Just Giving, where consent for personal information to be shared has been made.

### Website

WSWG gathers general information from visits to its website, which might include pages visited most often illustrating details of activities, events, or information of most interest. We also uses "cookies" to help our websites run effectively and provides webpage forms for visitors to submit enquiries or other information. Further information about how WSWG uses website “cookies” is below. Wherever possible WSWG use anonymous information, which does not identify individual visitors to our website.

## 2. Information we collect and how it is used

Personal information we often collect includes details such as name, date of birth, email address, postal address, telephone number, as well as information provide via general communications with us.

**WSWG will mainly use information to:**

- Plan and coordinate the services that we offer.
- Determine how we are best placed to provide helpful services.
- Process any donations or other payments, to claim Gift Aid on donations and verify financial transactions.
- Provide services requested.
- Keep a record of relationships with us.
- Manage enquires and volunteer relationship and ensure that appropriate checks can be carried out.

If information is not provided, the range of activities or participation levels with WSWG will be limited. We will not be able sign subscribers to news and event listings, provide services, or process donations.

**We may also use personal information to:**

- Make contact about our work and how support can be gained from FCA in the future.
- To invite participation in surveys or research.

**Special Categories of information**

The Data Protection Act 2018 GDPR recognises that some categories of personal information are more sensitive and classifies this as Special Category of personal data. This sensitive information can include information about:

- Personal health
- Political opinion
- Religious beliefs
- Race
- Sexuality
- Ethnic origin
- Gender orientation

If Special Categories of personal information are provided, they are only used to:

- Provide services that require the collection of this information in order to be delivered at a personal level.
- Inform internal processes that are not passed to anyone else without formal permission except in exceptional circumstances. Examples of such exceptions may be where there is significant risk of harm, where a threat to others exists, such as concerns relating to children or vulnerable adults who might be at risk of harm, abuse, or exploitation. As well as responding to requests from statutory law enforcement agencies
- Share information publicly only when consent has been given, such as in a newsletter or website story.

### 3. Legal basis for using information

When we process personal information, WSWG will always utilise a permitted and lawful reason for doing so in compliance with the Data Protection Act 2018 (GDRP). Depending on why we need to process the information, the lawful basis will vary. Some of the process we use are related to maintaining:

**Consent**

All people who provide personal information and data are informed of the reasons why WSWG is collecting and processing data. An acknowledged agreement of consent must be made before data can be held.

**Public Interest**

Public interest refers to activities supported by a piece of legislation, such as WSWG undertaking work associated with the Scotland Act, for example engaging in learning or wellbeing support provision.

**Legitimate Interest**

Processing personal data is undertaken because there is a legitimate interest for WSWG to process information to help us achieve our charitable objectives. This measure is underpinned by ensuring there is a balanced approach that can ensure individual data rights and interests are protected.

### **Legal Obligation**

WSWG will use this measure if it needs to process personal data to comply with common law or a statutory obligation. An example of this would be holding Gift Aid information for a minimum number of years or complying with taxation authority requirements.

### **Contract**

WSWG uses this clause as the basis to fulfil contractual obligations.

### **Special Category data**

In order to process Special Category data, WSWG also needs to utilise additional data safeguards. As a charity WSWG references Article (9) (d) of the Data Protection Act 2018 GDPR, as the reason for applying this condition.

### **Marketing**

WSWG only contacts those who it holds information about with regard to marketing activities that directly inform our work and how communication can be made, where a person has agreed and given consent for contact to be maintained.

Different projects and services within WSWG may get in contact in relation to their work and involvement. A request to Stop Receiving Marketing Information or associated correspondence can be made at any time. This can be done by contacting our office. Electronic newsletters to supporters and subscribers also provide link functions to unsubscribe at any time.

If no future correspondence from WSWG relating to marketing and updates is required, this can be requested via emailing: [contact@weststormontwoodlandgroup.scot](mailto:contact@weststormontwoodlandgroup.scot) stating the nature of the request and a subscriber will be removed from all distribution lists.

## **4. Sharing information**

The information that we collect will be used by WSWG trustees, staff and volunteers for informing, planning and delivering services solely related to our charitable activities.

WSWG will never sell or share personal information with other organisations for the purpose of any marketing activities. Neither will we sell or share any information about website browsing or social media activity.

WSWG may share information with trusted partners and suppliers who work with us or on our behalf to deliver services, but processing of this information is always carried out under our direct and specific instruction. WSWG may enter into contracts with such service providers, requiring them to provide evidence that they comply with Data Protection Laws and ensure that they have appropriate controls in place to secure personal information and data held.

### **Legal disclosure**

WSWG may disclose information if required to do so by law. For example, to comply with applicable laws, legal enforcement, regulations and codes of practice, in response to a valid request from a statutory authority, or in order to maintain contractual agreements.

## **5. Keeping information safe**

In compliance with the Data Protection Act 2018 (GDPR), WSWG maintains robust technical and organisational measures to protect and maintain the security of personal information and data we are responsible for controlling. This occurs at a number of levels and relates to protecting both on and off-line forms from unauthorised access, improper use, unauthorised dissemination, alteration, destruction and loss.

Access to our website maintains the most up-to-date security measures in maintaining data security and privacy. However, WSWG are not responsible for the content or the privacy practices utilised by other sites, where a link may have been provided. This privacy statement does not cover the information practices of such other websites.

## 6. How long we hold information

WSWG maintains retention guidelines for all personal information that it holds. The periods set are based on what is safe and reasonable and will allow us to perform the functions for which we have collected and retained information.

Where we legally or regulatory required to hold certain types of data information for a set period, which may exceed that which it has been used for, such data will be minimised as much as possible securely archived.

Maintaining the protection and security of personal information is paramount when set data retention takes place.

## 7. Data Access Rights

Depending on the legal basis for processing information. Specific rights are enshrined within legislation appertaining to the reasons for which personal data is held. These are set out below.

Those rights can be exercised at any time and include the right to make a complaint relating to how information is being processed or held. For further information, please contact or contact us via:

- West Stormont Woodland Group, Kinclaven, Stanly, Perth and Kinross, PH1 4QJ
- Email: [contact@weststormontwoodlandgroup.scot](mailto:contact@weststormontwoodlandgroup.scot)

A complaint can also be made to the UK's data protection supervisory authority, the Information Commissioner's Office, at [www.ico.org.uk](http://www.ico.org.uk)

### Access to personal information (Data Subject Access Request)

Where data is held, people have a right to request access to a copy of the personal information about them, along with information on how personal information is used, who it is shared with, how long it is retained and whether it has been used for any automated decision making processes. A reasonable request for access to the information held can be made via a statutory Data Subject Access Request free of charge.

All requests for to WSWG to access information via formal a Data Subject Access Request must be made in writing and provide evidence of identity. All requests must be fully responded to by WSWG within 30 days.

### Right to object

A person can object to WSWG holding and processing their personal information where there is a legitimate concern, or a situation exists for objecting to data processing. A person also has the right to object where WSWG is processing personal information for direct marketing purposes. Please contact us above, providing details if and objection is sought.

### Consent

If consent has been given to use personal information (for example, for marketing). A person can withdraw such consent at any time.

### Rectification

A person can ask for information held upon them to be changed in terms of correcting incomplete or inaccurate personal information.

**Erasure**

Requests can be made to delete personal information where it is no longer necessary for WSWG to use it, if consent has been withdrawn, or where there is no lawful basis for keeping it.

**Transfer**

A request can be made to provide a third party with personal information that WSWG may hold relating to commonly used or electronic formats, so it can be easily transferred.

**Restriction**

Requests can be made to restrict personal information we use, where requests for data erasure have been made or where a data objection has been made.

**No automated-decision making**

Automated decision-making takes place when an electronic system uses personal information to make a decision without intervention. A right exists not to be subject to automated decisions that may have a legal or other significant impact and where consent must be provided as necessary contract otherwise permitted in law between WSWG and those who it holds data upon. A right also exists to challenge automated decisions making processes. WSWG does not currently carry out any automated decision-making.

- Some of these rights only apply in certain circumstances and WSWG may not be able to fulfil every request if data must be lawfully restricted or retained.

**Website Privacy and Cookies**

When viewing our website, the automatic collection of technical data about users equipment, browsing actions and usage patterns may take place.

This data is collected using cookies, server logs and similar technologies. Cookies are small temporary text files placed upon a website viewing device that may be used to record a visit to:

[www.weststormontwoodlandgroup.scot](http://www.weststormontwoodlandgroup.scot)

These cookies and other technologies ensure:

- Content from our website is presented in the most effective way for a user and their computer or other website viewing device being used.
- Website users are allowed to participate in interactive features should they choose to do so.
- Protection of web hosting server integrity, website content and people viewing the website.
- All data provided upon our websites is stored on secure, encrypted servers within UK jurisdiction
- All data transmissions are encrypted using SSL (Secure Socket Layer) technology.