

Dundee Civic Trust (SCIO)

Privacy Notice

Introduction

This Privacy Notice is prepared in connection with the implementation of the EU General Data Protection Regulation (GDPR) on 25 May 2018. This builds upon previous data protection law to give the individual more control over the use of their personal data.

Dundee Civic Trust is committed to protecting your privacy and only processing personal data in accordance with the law.

In plain English, 'personal data' means any kind of information from which you might be identified. 'Processing' means what we do with it, which might be simply keeping your name on a register, communicating with you or sharing information with other organisations. You are entitled to know what data we hold and what processes apply.

Who we are

Dundee Civic Trust is a Scottish Charitable Incorporated Organisation (SCIO) dedicated to the preservation and promotion of the natural, historic, artistic, cultural and social amenities and features of the City of Dundee and its neighbourhood. We are regulated by the Office of the Scottish Charity Regulator (OSCR) and affiliated to the Scottish Civic Trust.

The board of trustees of Dundee Civic Trust is defined as the **data controller** for the purposes of data protection.

Our governing document, the Constitution, may be viewed online at www.dundeecivictrust.co.uk or obtained on request to the Secretary.

Explanation of 'lawful basis'

For data processing to be fair, we must carry it out in accordance with a recognised lawful basis. The following lawful bases may apply to your personal data as held by Dundee Civic Trust:

- **Contract:** Where we have an arrangement with you in connection with supply of goods or services.
- **Consent:** Where we need to obtain your consent to process your data in a particular way.
- **Legal obligation:** Where processing data for a particular purpose is a legal requirement.
- **Legitimate interest:** Where we have a genuine and legitimate reason to process your data without consent, provided it does not adversely affect your other rights and freedoms.

Where each lawful basis is referred to below, it is highlighted in **bold type**.

When does Dundee Civic Trust collect personal data?

We will collect and record items of personal data:

- When you join Dundee Civic Trust, or renew your membership;
- When you make a Gift Aid declaration;
- When you contact or enter into correspondence with us;
- When you attend a board meeting or statutory members' meeting, or make some contribution to the proceedings of such a meeting (either in person or otherwise);
- When you hold a position as a trustee or member of a sub-committee;
- When we have a contract with you, or you are established as a contact for an organisation with which we interact.

What kind of personal data do we collect?

We will collect and record the following information:

- Your name, address and other contact details if you are a member (or representative of a corporate member), a correspondent or person with whom we have a contractual arrangement;
- The fact that you are a UK taxpayer, if making a Gift Aid declaration;
- The dates on which you become a member or trustee, or cease to be one;
- Any position you hold on the board of trustees or sub-committees;
- The content of any correspondence with you in relation to the aims of Dundee Civic Trust;
- Your name if you are present at, or make a submission to, a board meeting or statutory members' meeting and details of any contribution you make to the proceedings (recorded in the minutes).

How and why do we use your personal data?

Communicating with you as a member

It is in the **legitimate interest** of Dundee Civic Trust to promote our charitable aims. When you join, we believe you have a reasonable expectation that we may communicate with you for the following purposes:

- To notify you of our programme of events;
- To send you a copy of the journal and news bulletins;
- To advise you of other matters relating to the Trust's activities;
- To respond to any comments or enquiries.

We will use any of the contact details you have provided, as applicable. Provision of email address and telephone number is always appreciated as this keeps costs down. However, you may opt out of these means of contact at any time by notifying the Membership Secretary, who will then delete this information from your personal data.

When contacting you by email, we will ensure that your address is not visible to other recipients except where this is required for the business of the board or sub-committees.

We have a **legal obligation** to notify you of any statutory members' meetings (including the annual general meeting) held under the terms of our Constitution.

We will not use your contact details to circulate publicity or marketing material from other organisations unless the contents have been endorsed by our board of trustees as directly relative to our charitable aims.

Other communications

We will use your contact details as provided if you are someone with whom we have a **contract**, or a representative of an organisation with whom we have a **contract** (for example sponsors).

If you have contacted us about a matter relative to the Trust's aims, we will retain your details for as long these are relevant and may place the correspondence in our archive (see below).

Gift Aid

When you make a Gift Aid declaration, we will obtain your **consent** to process the information you have given and to retain it for future use.

Maintaining records and archives

We have a **legal obligation** to maintain a register of members and a register of trustees. Further details are set out in clauses 17-19 and 64-66 of our Constitution.

We have a **legal obligation** to retain minutes of board and members' meetings (including the Annual General meeting).

It is in our **legitimate interest** to maintain a 'corporate memory' of the Trust's actions and decisions through an archive of correspondence and other materials.

How long will we keep your personal data?

Personal data will only be retained for as long as the lawful basis being used for processing it remains applicable.

Most information concerning your membership will be kept only for as long as you are a member, although we have a **legal obligation** to retain the names of past members for a period of six years after cessation of membership. We have a similar **legal obligation** in respect of former trustees.

Minutes of meetings are retained without limit of time. Copies of correspondence and other documents held as archives will be retained for as long as the **legitimate interest** of retaining a 'corporate memory' remains valid.

When and with whom do we share personal data?

We have a **legal obligation** to release information, which may include personal data, in the following circumstances:

- We must provide a copy of the register of members, or the register of trustees, to other parties with reasonable grounds for requesting it. The details are given in clauses 19 and 66 of our Constitution.
- We must provide a copy of the minutes of any board meeting or members' meeting to a member of the public requesting them, subject to the conditions in clause 96 of our Constitution.
- We must allow the Office of the Scottish Charity Regulator (OSCR) to inspect any documents which relate to our status as a registered charity.
- We must cooperate as necessary in any legal investigation.

We will not share your personal data under any other circumstances, without first obtaining your **consent**.

Your rights as a data subject

You have the right:

- To request access to the personal data we hold about you;
- To request we amend (or, in certain circumstances, delete) your personal data when incorrect, out of date or incomplete;
- To withdraw **consent** previously given for processing your personal data;
- To request we stop any processing of your personal data on the basis of **legitimate interest**, for reasons connected to your individual situation.

If you wish to make any of these requests or have any other enquiries regarding your personal data, please contact the board of trustees via the Secretary. If we are unable to action your request, we will explain to you the reasons for our refusal.

If you are unhappy with our response to any concerns regarding management of your personal data, you may raise the matter with OSCR (www.oscr.org.uk/about-charities/raise-a-concern) or lodge a complaint with the Information Commissioner's Office. You can contact them by calling 0303 123 1113 or visiting ico.org.uk/concerns.

**Issued by the Board of Dundee Civic Trust
May 2018**