

Wester Hailes Community Trust

GDPR Fair Processing Notice **(How we use your personal information)**

The Wester Hailes Community Trust (WHCT) is a collaborative community organisation that has been established to support genuine community-led development in Wester Hailes. It is run by local people for local people. As a community organisation, we sometimes collect your personal information. This notice explains what information we collect from you, why we collect it, and how we use it. During the course of our activities we will process personal data (which may be held on paper, electronically or otherwise) about you, and we recognise the need to treat it in an appropriate and lawful manner. The purpose of this notice is to make you aware of how we handle your information.

Who are we?

We are the Wester Hailes Community Trust, a Scottish Charitable Incorporated Organisation (SCIO) SC046486. Our Registered Office is 30 Westburn Grove, Wester Hailes, Edinburgh, EH14 2SA

We take the issue of security and data protection very seriously and strictly adhere to guidelines published in the [Data Protection Act of 1998] and the General Data Protection Regulation (EU) 2016/679 which is applicable from the 25th May 2018, together with any domestic laws subsequently enacted.

The person responsible for is Caroline Richards. Any questions relating to this notice and our privacy practices should be sent marked For the Attention of this person by email info@westerhalesct.org.uk or by phone 0131 458 3267.

How we collect information from you and what information we collect

We collect information from you if you request to be added to our mailing list, if you join the WHCT as a member, if you apply as an individual for a Small Sparks Grant, if you are a Small Sparks Grant recipient, and if you become a WHCT Trustee.

We collect the following personal information about you:

- Name
- Address
- Telephone number/ mobile number
- E-mail address
- Photos

If you join as a member we additionally collect

- Date of birth

Why we need this information about you and how it will be used

We need this information to

- Comply with the legal requirement from the Scottish Charity Regulator (OSCR) that as a SCIO we maintain a Register of Members and a Register of Charity Trustees.

- Comply with the terms of our legal constitution approved by OSCR that people joining the WHCT as voting individual members live within our defined geographical area and are either 16 years old or over.
- Enable us to monitor Small Spark grants and to check that all grant requirements have been met as set out in the funding agreement.
- Enable us to assess Small Spark grant applications to check if they meet our criteria as set out in the application form.
- Keep people on our mailing list, both members and contacts, up to date with our news, events and information where this is of legitimate interest to them.
- Use photos where consent has been given to share project activity with funders, and to publicise the work of the WHCT in print, on our website and through social media sites. We will ask you for this consent and you will also be able to choose how this photo is used.

Sharing of Your Information

The information you provide to us will be treated as confidential and will be processed within the UK/ EEA. It will be processed by our Trustees or by WHALE Arts Agency as a data processor as part of their administrative role for WHCT as detailed in our management agreement with them. We will only share your information with other third parties in the following circumstances:

- We have a duty which is required by OSCR to provide a copy of the Register of Members if requested by a WHCT member or WHCT Trustee. If the request is reasonable, we need to provide this within 28 days. If the person making the request is a member but not a Trustee, we will omit the addresses of all members from the copy of the register we supply so that only names are shared.
- We have a duty which is required by OSCR to provide a copy of the Register of Charity Trustees if requested by an individual. If the request is reasonable, we need to provide this within 28 days. If the person making the request is not a WHCT Trustee, we will omit the addresses of all charity trustees from the copy of the register we supply so that only names are shared.
- Applications from individuals for Small Sparks grants are shared with the WHCT Funding Panel made up of local volunteers who assess the applications and make recommendations. We remove addresses and other contact details from the copies of the applications that are circulated to the Funding Panel.

Unless required to do so by law, we will not otherwise share, sell or distribute any of the information you provide to us without your consent.

Security

When you give us information we take steps to make sure that your personal information is kept secure and safe.

- Our mailing lists, Register of Members, Register of Charity Trustees and Small Sparks application forms are stored securely online within Google Docs. Google is committed to

GDPR compliance and operates a high level of security. Full details of Google's security measures can be found at www.privacy.google.com/businesses/security.

- Only WHCT Trustees and WHALE in its role as data processor have access to personal data stored online.
- Paper copies of applications forms are stored securely within our registered office at WHALE Arts Agency.
- WHCT Trustees and Funding Panel volunteers undergo regular training including data protection. We maintain a training log to check that data protection training is up to date.

How long we will keep your information

Register of Charity Trustees	6 years from when a person stops being a trustee as required by OSCR
Register of Members	6 years from when a person stops being a member as required by OSCR
Mailing List	Updated every year
Small Sparks Applications	1 year
Photos	3 years

Your Rights

You have the right at any time to:

- ask for a copy of the information about you held by us in our records;
- require us to correct any inaccuracies in your information;
- and make a request to us to delete what personal data we hold about you

If you would like to exercise any of your rights above please contact us info@westerhalesct.org.uk

You also have the right to complain to the Information Commissioner's Office in relation to our use of your information. The Information Commissioner's contact details are noted below:

The Information Commissioner's Office – Scotland
45 Melville Street, Edinburgh, EH3 7HL
Telephone: 0131 244 9001
Email: Scotland@ico.org.uk

The accuracy of your information is important to us - please help us keep our records updated by informing us of any changes to your email address and other contact details.

30 Westburn Grove Edinburgh EH14 2SA t: 0131 458 3267 w: www.westerhalesct.org.uk
info@westerhalesct.org.uk

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