



LISMORE COMMUNITY TRUST

Purpose: to maximize the potential social, economic and environmental wellbeing of the whole community of the Isle of Lismore

Data Privacy Policy

Your personal data – what is it?

Personal data relates to a living individual who can be identified from that data. Identification can be by the information alone or in conjunction with any other information in the data controller's possession or likely to come into such possession. The processing of personal data is governed by the General Data Protection Regulation 2016/679 (the GDPR)

Who are we?

Lismore Community Trust is the data controller. This means it decides how your personal data is processed and for what purposes.

How do we process your personal data?

Lismore Community Trust complies with its obligations under the GDPR.

- by keeping personal data up to date;
- by storing and destroying it securely; by not collecting or retaining excessive amounts of data;
- by protecting personal data from loss, misuse, unauthorised access and disclosure and by ensuring that appropriate technical measures are in place to protect personal data.
- We use your personal data for the following purposes:
 - To administer Member, Friends and Directors registers;
 - To inform Members and Friends of meetings, news, events, activities or services related to Lismore Community Trust, its projects and membership
 - To contact Members and Friends to gather their opinions of current projects or of potential new projects that may be being considered.
 - To process Gift aid applications
 - To manage our employees and volunteers

What is the legal basis for processing your personal data?

- Consent of the individual to whom the data relates:
 - Member provision of email information
 - Friends form completion
- Processing is necessary for compliance with a legal obligation:
 - Company Law requires that we “Keep a register of charity Directors and of Members”
 - The Register of Members must include:
 - Name and address of each Member
 - Date on which each person registered as a Member
 - Date at which each person ceased to be a Member
 - Class of membership

Former Member records must be retained for 10 years from the date they ceased to be a Member, to comply with Company Law.

- The Register of Directors must include:
 - Name and any former name
 - A service address
 - The country or state in which he/she is usually resident
 - Nationality
 - Business occupation
 - Date of birth
- Processing is necessary for the performance of a contract with the individual to whom the data relates or to take steps to enter into a contract:
 - Employee Contracts
 - Contractor Contracts
 - Volunteer Contracts
- Processing is necessary for the legitimate interest of Lismore Community Trust or a third party, except where such interests are overwritten by the interest, rights or freedoms of the individual to whom the data relates:
 - Grant funding / Gift Aid reporting and monitoring requirements state that “the Grantee must keep and maintain for a period of 6 years adequate and proper records and books of account”

Sharing your Personal Data

Your personal data will be treated as strictly confidential and will only be shared with other organisations or third parties to comply with a legitimate interest or a legal obligation.

Third Parties: Company Law states that we have to make the registers of Members and Directors available to third parties on legitimate request.

How long do we keep your personal data?

- We keep your personal data for no longer than reasonably necessary:
- A Member's individual data is kept for a period of 10 years after the individual ceases to be a Member. This is to comply with Company law
- Data on the Friends list is deleted as soon as an individual ceases to be a Friend of the trust.
- Grant funding / Gift Aid information is kept for a period of 6 years in order to comply with funding obligations.
- Employee data is kept for a period of at least 6 years following the termination of employment; some personal financial data is destroyed after 2 years;
- Health and Safety information must be held for a minimum of 40 years.

Your rights and your personal data

Unless subject to an exemption [under the GDPR], you have the following rights with respect to your personal data: -

- The right to request a copy of your personal data which Lismore Community Trust holds about you;
- The right to request that Lismore Community Trust corrects any personal data if it is found to be inaccurate or out of date;
- The right to request your personal data is erased where it is no longer necessary for Lismore Community Trust to retain such data;
- The right to withdraw your consent to the processing at any time
- The right to request that Lismore Community Trust provide an individual with his/her personal data and where possible, to transmit that data directly to another data controller, known as the right to data portability, (where applicable)
- The right, where there is a dispute in relation to the accuracy or processing of your personal data, to request a restriction is placed on further processing;
- The right to object to the processing of personal data, (where applicable)
- The right to lodge a complaint with the Information Commissioners Office.
- Transfer of Data Abroad. If the personal data is to be transferred to countries or territories outside the EU you must include details of how the data will be protected, together with details of how to obtain copies of the relevant safeguards].

Lismore Community Trust at your request can confirm what information it holds about you and how it is processed.

You can request the following information:

- A copy of your personal data which Lismore Community Trust holds about you
- The purpose of the processing as well as the legal basis for processing.
- The categories of personal data collected, stored and processed.
- Recipient(s) or categories of recipients that the data is/will be disclosed to.
- How long the data will be stored.
- Details of your rights to correct, erase, restrict or object to such processing.
- Information about your right to withdraw consent at any time.
- How to lodge a complaint with the supervisory authority (Data Protection Regulator).
- Whether the provision of personal data is a statutory or contractual requirement, or a requirement necessary to enter into a contract, as well as whether you are obliged to provide the personal data and the possible consequences of failing to provide such data.
- The source of personal data if it wasn't collected directly from you.
- Any details and information of automated decision making, such as profiling, and any meaningful information about the logic involved, as well as the significance and expected consequences of such processing.

Complaints

In the event that you wish to make a complaint about how your personal data is being processed by Lismore Community Trust, you have the right to complain to Lismore Community Trust Directors. If you do not get a response within 30 days you can complain to the Data Protection Regulator.

The details for each of these contacts are:

Lismore Community Trust
2 Port Ramsay
Isle of Lismore
Argyll
PA34 5UN
Email: communitytrust@isleoflismore.com

Data Protection Regulator
ICO (Information Commissioner's Office)
Telephone: 0303 123 1113
<https://ico.org.uk/global/contact-us/>