



HIGHLAND  
THIRD  
SECTOR  
INTERFACE

## PRIVACY NOTICE

### Who are we?

We are Highland Third Sector Interface, Scottish Registered Charity Number SC043521 and Scottish Registered Company Number SC425808.

You can contact us:

Email: [enquiry@highlandtsi.org.uk](mailto:enquiry@highlandtsi.org.uk)

Post: Thorfin House, Bridgend Business Park, Dingwall IV15 9SL

Phone: 01349 864 289

Any enquiries about our use of your personal data (including any requests to exercise your rights in relation to your data) should be addressed to the contact details above.

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues ([www.ico.org.uk](http://www.ico.org.uk)). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

### Changes?

We keep this privacy notice under regular review and, if we make any changes to this notice, we will place an updated version on our website and, where appropriate, notify you by e-mail. Regularly reviewing this notice ensures you are always aware of what personal information we collect, how we use it and under what circumstances, if any, we will share it with other parties.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

### What personal data do we collect?

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

When you apply to become a member of HTSI or one of our Hosted Projects, we ask you for your name, date of birth, address and preferred contact details. If you are a trader or an employee who we need to make a payment to, we will also ask for your banking details. We will also use personal data in order to communicate with you on your chosen subjects as described below.

- **Identity Data** includes first name, maiden name, last name, username or similar identifier, title, date of birth and geographic location.

- **Contact Data** includes home / billing / delivery / trading / operating address, email address and telephone numbers (business and / or personal).
- **Profile Data** includes enquiries, purchases or orders made by you, your interests, preferences, feedback and survey responses.
- **Marketing and Communications Data** includes your preferences in receiving marketing from us and our third parties and your communication preferences.

We do not collect any Special Categories of Personal Data about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data). Nor do we collect any information about criminal convictions and offences.

### **Why do we collect personal information and how will we use it?**

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- Where we need to perform the contract, we are about to enter into or have entered into with you.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- Where we need to comply with a legal or regulatory obligation.

More information about the types of lawful basis that we will rely on to process your personal data is contained at the end of this notice.

We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

<b>Purpose/Activity</b>	<b>Type of data</b>	<b>Lawful basis for processing including basis of legitimate interest</b>
To register you as a member of HTSI, or one of our Third Sector Forums.	(a) Identity (b) Contact	Performance of a contract with you
To provide you with our services or to process and deliver your enquiry or order including:	(a) Identity (b) Contact (c) Financial (d) Transaction (e) Marketing and Communications	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to recover debts due to us)

<p>(a) Registration as a member of HTSI or one of our Third Sector Forums.</p> <p>(b) Contacting you by phone or in person to carry out a survey which you have agreed to participate in.</p> <p>(c) Making bookings for Training Courses and Conferences on your behalf, including providing any relevant information to the third parties with whom we are booking your attendance with.</p> <p>(d) Sending you confirmation of your booking or agreed service.</p> <p>(e) Managing payments, fees and charges</p> <p>(f) Collecting and recovering money owed to us</p>	<p>(f) Special Categories of Personal Data</p>	<p>AND (in relation to any Special Categories of Personal Data)</p> <p>(a) Information is made public by you</p> <p>(b) Consent</p>
<p>To manage our relationship with you which will include:</p> <p>(a) Notifying you about changes to our terms or privacy policy</p> <p>(b) Asking you to leave a review or take a survey, which we may also pass onto our funders in response to audit enquires to us</p> <p>(c) Answering your enquiries and providing you with information</p> <p>(d) Providing you with a call back if requested through email or other platforms.</p>	<p>(a) Identity</p> <p>(b) Contact</p> <p>(c) Profile</p> <p>(d) Marketing and Communications</p>	<p>(a) Performance of a contract with you</p> <p>(b) Necessary to comply with a legal obligation</p> <p>(c) Necessary for our legitimate interests (to keep our records updated, to study how people use our products/services and engage with us and to meet the audit requirements of funders)</p>
<p>To update the Milo database</p>	<p>(a) Identity</p> <p>(b) Contact</p>	<p>(a) Necessary for our legitimate interests (for maintaining a record of volunteers and volunteering opportunities and for meeting our obligations to the Scottish Government)</p>
<p>To administer and protect our organisation and our website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)</p>	<p>(a) Identity</p> <p>(b) Contact</p> <p>(c) Technical</p>	<p>(a) Necessary for our legitimate interests (for running our operations, provision of administration and IT services, network security, to prevent fraud and</p>

		in the context of a reorganisation or restructuring exercise) (b) Necessary to comply with a legal obligation
To deliver relevant website content and advertisements to you and measure or understand the effectiveness of the information we serve to you	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications (f) Technical	Necessary for our legitimate interests (to study how people use our products/services, to develop them, to grow our operations and to inform our marketing/information strategies)
To use data analytics to improve our website, products/services, marketing and information services, service user/customer relationships and experiences	(a) Technical (b) Usage	Necessary for our legitimate interests (to define types of customers for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy)

Where we need to collect personal data by law, or under the terms of a contract we have with you and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with services). In this case, we may have to cancel a product or service you have with us but we will notify you if this is the case at the time.

### **What do we do with your information?**

Your information is stored the Membership Very Connect Database, which is our only database used for the storing of personal details of our members or those people who have signed up to any of our Third Sector Forums.

We (including our Delivery Partners) also record contact details from young people who have signed up to the Saltire Awards Programme for Youth Volunteering, and for our adult volunteers.

This data is shared with our funders (The Scottish Government) and those charged with collating volunteering statistics, such as Volunteering Scotland. Any other requests to share such data would require a Data Sharing Agreement to be compiled.

### **How long do we keep your information for?**

We will keep your information for a period of five years, or until you request its removal if that is earlier. Your personal information will then be deleted.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

In some circumstances you can ask us to delete your data: see “request erasure” below for further information.

In some circumstances we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

### **Your rights in relation to your information**

Under certain circumstances, you have certain rights under data protection laws in relation to your personal data. More detail about these rights is provided below in the Glossary. If you wish to exercise any of the rights set out, please contact us.

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

## **Glossary**

### **Lawful Basis**

**Legitimate Interest** means the interest of our business in conducting and managing our business to enable us to give you the best service/product and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by contacting us.

**Performance of Contract** means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.

**Comply with a legal or regulatory obligation** means processing your personal data where it is necessary for compliance with a legal or regulatory obligation that we are subject to.

**Consent** means processing your Special Categories of Personal Data with your express, freely given, specific and informed consent.

**Information made public by you** means processing your Special Categories of Personal Data where the processing relates to personal data already manifestly made public by you.

## Your Legal Rights

### You have the right to:

**Request access to your personal data** (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.

**Request erasure of your personal data.** This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

**Object to processing of your personal data** where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

**Request restriction of processing of your personal data.** This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

**Request the transfer of your personal data** to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

**Withdraw consent** at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.