Privacy Policy

This notice outlines the Data Protection policies and procedures we have adopted, and to which we will abide to ensure we are GDPR compliant. The purpose of this notice and any other documents referred to in it, is to clearly outline and identify the legal requirements, procedures and rights which must be established when we obtain and process your personal data. This notice will assist you in understanding the obligations, responsibilities and rights which arise from the Data Protection Laws.

WHO WE ARE

We, The Deveron, Bogie and Isla Rivers Charitable Trust, a registered charity SC 032131, a Limited Company by guarantee and our registered address is The Offices, Avochie Stables, Avochie, AB54 7YY.

We are registered with the Information Commissioner's Office as a data controller is ZA303877.

We are committed to protecting your personal information and privacy. This Privacy Policy describes exactly how we collect and use your personal information.

We may update this Privacy Policy from time to time so please check back periodically. We will notify you of significant changes by placing a notice on our website.

By contacting us, using our services or visiting our website you're agreeing to be bound by this Policy.

If you have any queries about this Privacy Policy, please contact us at admin@deveron.org

YOUR PRIVACY

Everyone has rights with regard to the way in which their personal data in handled. During our activities, we will collect, store and process personal data about our customers, suppliers and other third parties, and we recognise that the correct and lawful treatment of this data will maintain confidence in the organisation and will provide for successful business operations.

Your personal data, which may be held on paper or on a computer or other media, is subject to certain legal safeguards specified in the Data Protection Act and equivalent EU regulations.

This policy and any other documents referred to in it, sets out the basis on which we will process any personal data we collect from you or that is provided to us by yourself or other sources. This policy sets out rules on data protection and the legal conditions that must be satisfied when we obtain, handle, process, transfer and store personal data.

The Data Protection Officer / GDPR Owner is responsible for ensuring that this notice is placed in front of potential data subjects prior to The Deveron, Bogie and Isla Rivers Charitable Trust collecting/processing their personal data.

In accordance with the GDPR anyone processing Personal Data must comply with the six principles of good practice. These provide that Personal Data must:

- be processed fairly, lawfully and transparently;
- only be used for the purpose for which it was collected;
- be adequate, relevant and not excessive for the purpose for which it is being processed;
- be accurate and kept up-to-date;
- not be kept longer than necessary to fulfil the purpose of its collection; and
- be kept secure and protected from unauthorised processing, loss, damage or destruction [which includes the data not being transferred to a country or territory outside the European Economic Area unless the Personal Data is adequately protected and/or consent of the Data Subject has been provided].

HOW PERSONAL INFORMATION IS COLLECTED

We collect personal information about you when you interact with us for example when you visit our Facebook page, when you subscribe or when you donate to a project managed by The Deveron Bogie and Isla Rivers Charitable Trust.

PERSONAL INFORMATION WE COLLECT

Personal information we collect about you may include your name, postal address, email address, phone numbers or date of birth. We do not collect "sensitive personal data" about you.

THE USE OF PERSONAL INFORMATION

We use the personal information collected from you for these purposes:

- to enable your donation(s) to reach us;
- to keep you up to date

LAWFUL BASIS FOR PROCESSING YOUR PERSONAL INFORMATION

Under Article 6 of the General Data Protection Regulations (GDPR) our lawful basis for processing and holding personal information is 'legitimate interest' as it is necessary for The Deveron Bogie and Isla Rivers Charitable Trust to use this information to provide you with our services.

FAIR PROCESSING

For Personal Data to be processed lawfully, the basis for the processing must be one of the legal grounds set out in the Enactments. These include, among other things, your written consent to the processing, or that the processing is necessary.

In the event we collect Personal Data directly from you, this Notice should assist in informing you about:

- The purpose or purposes for which we intend to process your Personal
- The types of third parties, if any, with which we may share or disclose your Personal Data.
- The means with which you can limit our processing and disclosure of your Personal Data.

If we receive Personal Data about you from other sources, we will provide you with this information as soon as possible thereafter.

THE DEVERON, BOGIE AND ISLA'S REGISTRATION AS A DATA CONTROLLER

The Deveron, Bogie and Isla Rivers Charitable Trust is registered as a Data Controller with the Information Commissioner's Office (ICO).

SHARING OF INFORMATION

We will never sell your data to any third party nor will we share your details with other entities for marketing purposes.

We will only share information with other organisations where we have your permission to do so in accordance with this Privacy Policy or where it is necessary for a legitimate reason connected with the services we offer, or where it is required by law or regulation.

The charity is only permitted to contact you if you give them specific consent. They might send you updates about news, events and fundraising activities. Sometimes, we may need to share your information with a small number of trusted partners (service providers) but only for the purposes outlined above (e.g. a partner that processes donor forms). Where we use third parties, we require them to adhere to appropriate controls to protect personal information.

YOUR CHOICES

You have a choice about whether or not you wish to receive information from us. If you do not want to receive direct marketing communications, then you can select your choices by ticking the relevant boxes situated on the forms where we collect your information.

You can change your communication preferences at any time by contacting us at admin@deveron.org

GIFT AID

Some donations you make will be eligible for Gift Aid and we claim Gift Aid on your behalf.

Once we have received these funds we allocate them to the specific project they were donated for.

To claim Gift Aid on your donation, you must currently pay Income Tax equal to or more than the amount of tax which will be reclaimed on your donation. The payment of other taxes such as Council Tax and VAT does not qualify.

As part of this process The Deveron, Bogie and Isla Rivers Charitable Trust is required to submit your details including your address to HMRC, and in asking us to make a Gift Aid claim you are giving us permission to use your personal details in this way.

DATA SECURITY

The Deveron, Bogie and Isla Rivers Charitable Trust is committed to keeping your personal information safe and secure and we have security policies and technical measures in place to help protect your information.

We will put in place procedures and technologies to maintain the security of all personal data from the point of collection to the point of destruction. Personal data will only be transferred to a data processing company if they are approved by us and agree to comply with these procedures and policies, or if they put in place adequate security measures.

All our employees who process data on our behalf are obliged to comply with our strict information security procedures.

WHERE YOUR DATA IS HELD

Your personal data is held on secure servers operated by us. We do not transfer your data outside the EEA.

COOKIES

Cookies are small text files stored on your device when you access most websites on the internet or open certain emails. Among other things, cookies allow a website to recognise your device and remember if you've been to the website before. We use the term cookie to refer to cookies and technologies that perform a similar function to cookies (e.g. tags, pixels, web beacons, etc). Cookies can be read by the originating website on each subsequent visit and by any other website that recognises the cookie.

We use these to improve our user's experience of our website, temporarily store data and understand the parts of the website that users are visiting.

We use cookies in order to make our website easier to use and, to support the provision of information and functionality to you.

Cookies are also used to help us gather statistics on the use of our website anonymously. as well as to provide us with information about how the website is used so that we can make sure it's kept as up to date, relevant and error free as we can.

By using our website, you agree to our use of cookies, including setting and reading cookies on your device. You can choose to restrict or block cookies through your browser settings at any time. For more information about how to do this, and about cookies in general, you can visit www.allaboutcookies.org

Whilst certain cookies may be set as soon as you visit a website, you can remove them using your browser settings - but this may impact the functionality or performance of the website.

Please note that third parties (including, for example, advertising networks and providers of external services like website analysis services) may also use cookies, over which we have no control, although we may receive services from these third parties (including, for example, for targeted advertising purposes and website analytics).

KEEPING YOUR INFORMATION UP TO DATE

The accuracy of your information is important to us. We're working on ways to make it easier for you to review and correct the information that we hold about you. In the meantime, if you change email address, or any of the other information we hold is inaccurate or out of date, please email us at admin@deveron.org

ACCESS AND PROBABILITY REQUESTS

You have the right to request a copy of the information we hold about you. Before we are able to assist with your request, we need you to confirm your identity and what data you require.

COMPLAINTS

In the first instance, you should contact The Deveron, Bogie and Isla Rivers Charitable Trust using the Standard Complaint Procedure:

By email: admin@deveron.org By telephone: 01466 711388

By post: The Offices, Avochie Stables, Avochie, AB54 7YY

To enable us to deal with your complaint quickly and effectively, please provide:

- Your name and address
- Your email address
- A daytime telephone number where we can contact you
- Details of your concern or complaint
- What you would like us to do to resolve your complaint

We aim to resolve your complaint quickly and fairly. We will acknowledge receipt of your complaint in writing within 48 working hours and you will receive a full written response within 10 working days. Our aim is to resolve the complaint to your complete satisfaction at this level.

If we need longer to respond because of the complexity of the complaint, we will let you know.

If we have not been able to resolve your complaint and you wish to escalate your complaint further, please contact the Charity Commission for details of who to contact, depending on the nature of your complaint.

General Data Protection Regulations (GDPR) complaints

If your complaint relates to our use of your personal data, you have the right to complain to the Information Commissioner's Office. We would encourage you to speak to us first, as outlined in the steps above.

CHANGES TO OUR DATA PROTECTION POLICY

We keep our privacy policy under regular review and reserve the right to amend and update the policy as required. Where appropriate, we will notify you of those changes by mail, email and/or by placing an updated version of the policy on our website.

Date of last revision: 17 May 2018