

## Dumfries High Street Limited

### Privacy Notice

#### Our contact details

**Name:** Mandy Bryson – Administrator/Co-ordinator

**Address:** C/O Armstrong Watson, 51 Rae Street, Dumfries, DG1 2BH

**E-mail:** [info@midsteeplequarter.org](mailto:info@midsteeplequarter.org)

This privacy policy was first approved on 28th May 2020

ICO application number: A8701907

#### Introduction

Dumfries High Street Ltd is committed to protecting any personal information shared with it by individuals, or that it receives from other organisations, and to keeping it safe.

This Privacy Notice explains how Dumfries High Street Ltd will use any personal information (data) it collects from you or others to comply with data protection law. This Privacy Notice applies to all data held by Dumfries High Street Ltd. It does not apply to pages hosted by other organisations or individuals which our site may link to or be linked from, whose privacy notices may differ.

Dumfries High Street Ltd is subject to the legal jurisdiction of Scotland and any data protection legislation that applies in that jurisdiction.

In legal terms, for the purpose of the Data Protection Act 2018 (which replaced the Data Protection Act 1998) (DPA) and the General Data Protection Regulation 2018 (GDPR), the data controller for this information is Dumfries High Street Ltd.

## **Who are we?**

Dumfries High Street Ltd is a Community Benefit Society (registration number: 7545) registered under the Co-operative and Community Benefit Societies Act 2014, established primarily to enhance the quality of life of the inhabitants of Dumfries by bringing assets into community ownership. It is governed by a voluntary Board of Directors.

## **Why does Dumfries High Street Ltd need your data?**

Dumfries High Street Ltd is committed to developing, managing and maintaining assets and initiatives in Dumfries. In order to do this effectively, we work with a range of individuals, groups and agencies to further our work.

We use the knowledge we have about people – personal data – only for the purpose of furthering the work of Dumfries High Street Ltd now and in the future. We understand our responsibilities as stewards of this data and will protect your privacy. This notice describes how we do this.

## **Whose personal data does Dumfries High Street Ltd collect and how it is collected?**

Personal data means any information capable of identifying an individual. It does not include anonymised data.

We hold data on individuals who have given financial or volunteer support to Dumfries High Street Ltd and those who might do.

The majority of personal data Dumfries High Street Ltd holds about you has been provided directly by you.

Dumfries High Street Ltd may also receive information about you from third parties, for example via a quote or invoice, or by an individual copying you into an e-mail. We may receive data from third parties such as carers, relatives, family members or others who have a power of attorney or your written permission, who are acting on your behalf.

Dumfries High Street Ltd may collect information available in the public domain including social media such as Facebook.

Dumfries High Street Ltd may also use publicly available directories, electoral registers and similar information such as the British Telecom's telephone number database, Companies House or your organisation's website.

Dumfries High Street Ltd may receive data from analytics providers, such as Google, based outside the EU; advertising networks, such as Facebook, based outside the EU; search information providers, such as Google, based outside the EU; and providers of technical, payment and delivery services, such as data brokers or aggregators.

## **What Personal Data do we collect about you, for what purpose and on what grounds is it processed?**

Dumfries High Street Ltd may process the following categories of personal data about you:

- **Communication Data** that includes any communication that you send to Dumfries High Street Ltd whether that be through letter, e-mail, text, social media messaging, social media posting or any other format. Dumfries High Street Ltd processes this data for the purposes of communicating with you, for record keeping and for the establishment, pursuance or defence of legal claims. Dumfries High Street Ltd's lawful ground for this processing is its legitimate interests, which in this case are to reply to communications sent to it, to keep records and to establish, pursue or defend legal claims.
- **Volunteer Data** that includes data relating to your role as a volunteer for Dumfries High Street Ltd including your name, title, age, postal address, email address, and phone number/s. Dumfries High Street Ltd processes this data to keep our volunteer list up to date, send correspondence on related issues and to keep records of such transactions. Dumfries High Street Ltd's lawful ground for this processing is its legitimate interests in operating a Community Benefit Society accountable to its Directors and members.
- **Member Data.** If you become a member, Dumfries High Street Ltd may also collect further data such as bank account details to verify your identity, process share payments and reimburse expense claims. Dumfries High Street Ltd's lawful ground for processing this data is to manage the governance of the organisation and comply with its legal requirements and obligations.

- **Director and Employee Data.** If you become a director or employee, Dumfries High Street Ltd may also collect further data such as: former names and addresses; nationality; date of birth; occupation; consent to act as a director; eligibility to act as a director; sample signature. We may also require photo identification and bank account details to verify your identity and reimburse any expense claims. Dumfries High Street Ltd's lawful ground for processing this data is to manage the governance of the organisation and comply with its legal requirements and obligations.

- **Marketing and Consultation Data** includes data about your preferences in receiving marketing and consultations from Dumfries High Street Ltd and your communication preferences. Dumfries High Street Ltd processes this data to deliver relevant website and social media content, to consult you on Dumfries High Street Ltd related and wider community development related activity. Our lawful ground for this processing is our legitimate interests in how residents use and benefit from Dumfries High Street Ltd's work and develop it in response to identified needs.

## **Who has access to data held by Dumfries High Street Ltd?**

Dumfries High Street Ltd's Board of Directors and project team has access to your data. Dumfries High Street Ltd will not sell or rent your data to third parties, nor share your data with third parties for marketing purposes. Dumfries High Street Ltd may pass data to other organisations, businesses and professional advisers, known as Data Processors, to provide specific services. An example would be providing data to a mailing house in order to send out a newsletter; an organisation providing electoral services to conduct a vote; or the organiser of an event or function that a Dumfries High Street Ltd representative is attending or Dumfries High Street Ltd has commissioned.

Dumfries High Street Ltd will also provide your data to establish and defend its legal rights, and to prevent and detect crimes such as fraud. It may need to share your personal data with other people for this reason, such as Courts and law enforcement agencies.

Dumfries High Street Ltd provides the necessary Trustee data to the Office of the Scottish Charities Regulator (OSCR) and Dumfries High Street Ltd appointed accountants because it has a legal obligation to provide this information.

Dumfries High Street Ltd requires all third parties to whom your data is transferred to respect the security of your personal data and to treat it in accordance with the law. Dumfries High Street Ltd only allows such third parties to process your personal data for specified purposes and in accordance with its instructions.

## **International Transfers**

We may use suppliers who run their operations outside of the European Economic Area (EEA). Although they may not be subject to the same data protection laws as companies based in the UK, we will take steps to make sure they provide an adequate level of protection in accordance with UK data protection law. By submitting your personal information to us you agree to this transfer, storing or processing at a location outside the EEA.

## **Security of your data**

Non-sensitive details (your email address, etc.), when transmitted normally over the internet cannot be guaranteed to be 100% secure. Whilst Dumfries High Street Ltd uses all possible means to protect your personal data, it cannot guarantee the security of any information you transmit electronically to Dumfries High Street Ltd, and you do so at your own risk.

Dumfries High Street Ltd has put in place security measures to prevent your personal data from being accidentally lost, used, altered, disclosed, or accessed without authorisation.

Dumfries High Street Ltd also allows access to your personal data only to those Directors, employees and parties who have a business need to know such data. They will process your personal data only on Dumfries High Street Ltd instructions and they must keep it confidential.

If you are a Dumfries High Street Ltd Director, contractor or employee, where Dumfries High Street Ltd has given you a password to access its social media accounts, and/or other online accounts and tools, you are responsible for keeping this password confidential and must not share it with others.

Where Directors' personal e-mail addresses are used to send and receive Dumfries High Street Ltd related correspondence, the Trustee is responsible for

password protecting it and keeping this password confidential and must not share it with others.

Dumfries High Street Ltd keeps your data secure on its IT systems with appropriate security mechanisms in place. Dumfries High Street Ltd does not share your data with anyone else or any other organisation unless it is necessary for the purposes outlined above listing why Dumfries High Street Ltd collects your data.

## **Your data protection rights**

Under data protection law, you have rights including:

**Your right of access** - You have the right to ask us for copies of your personal information.

**Your right to rectification** - You have the right to ask us to rectify personal information you think is inaccurate. You also have the right to ask us to complete information you think is incomplete.

**Your right to erasure** - You have the right to ask us to erase your personal information in certain circumstances.

**Your right to restriction of processing** - You have the right to ask us to restrict the processing of your personal information in certain circumstances.

**Your right to object to processing** - You have the the right to object to the processing of your personal information in certain circumstances.

**Your right to data portability** - You have the right to ask that we transfer the personal information you gave us to another organisation, or to you, in certain circumstances. You are not required to pay any charge for exercising your rights. If you make a request, we have one month to respond to you.

Please contact us using the details at the start of this document if you wish to make a data request.

## **How to complain**

If you have any concerns about our use of your personal information, you can make a complaint to us using the details at the start of this document.

You can also complain to the ICO if you are unhappy with how we have used your data.

The ICO's address:  
Information Commissioner's Office  
Wycliffe House  
Water Lane  
Wilmslow  
Cheshire  
SK9 5AF

Helpline number: 0303 123 1113

ICO website: <https://www.ico.org.uk>