



## **Kyle of Sutherland Hub Ltd Data Privacy Notice**

### **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?**

Kyle of Sutherland Hub Ltd is the data controller (contact details below). This means it decides how your personal data is processed and for what purposes.

### **How do we process your personal data?**

- Kyle of Sutherland Hub Ltd 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 enable us to provide a voluntary service within our organisation
- To administer membership records
- To fundraise and promote the interests of the charity
- To manage our employees and volunteers
- To maintain our own accounts and records.
- To operate the Kyle of Sutherland Hub Ltd website and deliver the services that individuals have requested.
- To inform individuals of news, events, activities or services run by Kyle of Sutherland Hub Ltd (including but not limited to the After School Clubs, Gym Induction forms & Membership forms, Soft Play Membership Forms, Hub Feedback forms Holiday and Weekend club enrolment forms.
- To process gift aid applications.
- To contact individuals via surveys to conduct research about their opinions of current services or of potential new services that may be offered.

### **What is the legal basis for processing your personal data?**

**Kyle of Sutherland Hub Ltd, The Bus, South Bonar Estate, Bonar Bridge, Sutherland IV24 3AQ  
Charity Registered in Scotland SC036130  
Company Limited by guarantee registered in Scotland No 501958**

Article 6 processing GDPR sets out six lawful bases for processing personal data (Article 6). The Hub processes personal data under the following bases:

- Consent of the data subject; (including photographic consent where applicable,) for marketing purposes: to be able to tell people about events and activities, news, services or for the purposes of providing a service.
- Processing is necessary for the performance of a contract with the data subject or to take steps to enter into a contract
- Employment Contracts
- Contractor Contracts
- Volunteer Contracts
- Funders Contracts
- Processing is necessary for compliance with a legal obligation.
- OSCR requires that we “Keep registers of charity trustees and of members “
  
- The Kyle of Sutherland Hub Ltd Articles of Association states “the directors shall maintain a register of members, setting out the full name and address of each member, the date on which he/she was admitted to membership, and the date on which any person ceased to be a member.”
- Grant Funding reporting and monitoring requirements state that “the Grantee must keep and maintain adequate and proper records and books of account”.

Article 9 Processing Kyle of Sutherland Hub Ltd does not process or hold any Special Categories of Personal Data as per Article 9 Sharing your personal data. Your personal data will be treated as strictly confidential and will be shared only with the authorised members of staff tasked with carrying out that project. We will only share your data with third parties outside of the organisation with your consent.

#### **How long do we keep your personal data?**

We keep your personal data for no longer than reasonably necessary and we only retain your data for the following purposes and use the following criteria to determine how long to retain your personal data:

To keep subscribers updated through our email distribution list (Until you advise that you wish to unsubscribe).

To keep members informed about Kyle of Sutherland Hub Ltd business (until you advise that you wish to resign).

To keep clients/ participants from the projects mentioned above informed about opportunities that may be of benefit to you and to provide evidence to Funders. (For three years.)

We keep employees’ personal data for a period of five years in case of any legal claims/complaints. 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 the Kyle of Sutherland Hub Ltd holds about you.

- The right to request that Kyle of Sutherland Hub Ltd 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 Kyle of Sutherland Hub Ltd to retain such data.
- The right to withdraw your consent to the processing at any time
- The right to request that Kyle of Sutherland Hub Ltd provide the data subject 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.
- Mailchimp E-newsletters and Survey Monkey questionnaires are certified to the EU-U.S. Privacy Shield Framework and the Swiss-U.S. Privacy Shield Framework Further processing If we wish to use your personal data for a new purpose, not covered by this Data Protection Notice, then we will provide you with a new notice explaining this new use prior to commencing the processing and setting out the relevant purposes and processing conditions. Where and whenever necessary, we will seek your prior consent to the new processing.

**Contact Details:**

To exercise all relevant rights, queries of complaints in the first instance, please contact:

Carol Shaw, Manager, Kyle of Sutherland Hub Ltd, South Bonar Industrial Estate, Bonar Bridge, Ardgay, Sutherland IV24 3DL.

Kyle of Sutherland Hub Ltd is a Company Limited by Guarantee.

Scottish Registration No: 501958 Charity Registered in Scotland: SC036130

VAT registration number: 212 741 246