

# Grampian Regional Equality Council Ltd

## Privacy Policy

### Introduction

At Grampian REC (GREC) we are committed to protecting and respecting your privacy, and maintaining the trust and confidence of members, supporters, stakeholders and other interested parties.

This privacy policy (the “Policy”) sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us. Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it.

For the purpose of the General Data Protection Regulations (GDPR), the data controller is Grampian Regional Equality Council Ltd, 41 Union Street, Aberdeen, AB11 5BN.

### Who we are

Here at GREC (Grampian Regional Equality Council), we are committed to protecting your personal information and making every effort to ensure that your personal information is processed in a fair, open and transparent manner.

We are a “data controller” for the purposes of the Data Protection Act 1998 and (from 25 May 2018) the EU General Data Protection Regulation 2016/679 (“Data Protection Law”). This means that we are responsible for, and control the processing of, your personal information.

For further information about our privacy practices, please contact us by:

- Writing to GREC, 41 Union Street, Aberdeen, Ab11 5BN
- Calling us on 01224595505
- Emailing to [info@grec.co.uk](mailto:info@grec.co.uk)

### How we collect information about you

Everything we do, we do to ensure that we can help people get both support, advice and access to relevant opportunities. We want to make sure you receive the communications that are most relevant to you, be it through visiting our website or receiving emails, post or phone calls. We want to make sure you receive the best attention when you book on an event, become a member, make a donation, seek a quotation for interpreting/translation.

We collect information from you in the following ways:

**When you interact with us directly:** This could be if you ask us about our activities, register with us for training or an event, make a donation to us, ask a question about equality, apply for a job or volunteering opportunity, request a quote for interpreting and/or translation, or otherwise provide us with your personal information. This includes when you phone us, visit our website, sign up for our e-bulletin or get in touch through the post, or in person.

**When you interact with us through third parties:** This could be if you provide a donation through a third party such as myDonate or one of the other third parties that we work with and you provide your consent for your personal information to be shared with us.

**When you visit our website:** We gather general information which might include which of our pages you visit most often and which services, events or information is of most interest to you. We may also track which pages you visit when you click on links in emails from us.

We use this information to personalise the way our website is presented when you visit to make improvements and to ensure we provide the best service and experience for you. Wherever possible we use anonymous information which does not identify individual visitors to our website.

## Information we collect and why we use it

### *Personal Information*

Personal information we collect includes details such as your name, email address, postal address, telephone number and credit/debit card details (if we make payments or receive donations), as well as information you provide in any communications between us. You will have given us this information whilst making a donation, registering for an event, seeking a quotation for interpreting/translation or any of the other ways you interact with us.

We will mainly use this information:

- To process your donations or other payments, to claim Gift Aid on your donations and verify any financial transactions.
- To provide the services or goods that you have requested.
- To update you with important administrative messages about your donation, an event or services or goods you have requested.
- To comply with the Charities (Protection and Social Investment) Act 2016 and follow the recommendations of the official regulator of charities, the Office of the Scottish Charity Regulator (OSCR), which require us to identify and verify the identity of supporters who make major gifts so we can assess any risks associated with accepting their donations.
- To keep a record of your relationship with us.
- Where you volunteer with us, to administer the volunteering arrangement.

If you do not provide this information, we will not be able to process your donation, sign you up for a particular event or provide goods and services you have requested.

We may also use your personal information:

- To contact you about our work and how you can support GREC (see 'Marketing' below for further information).
- To invite you to participate in surveys or research.

### *Sensitive Personal Information*

If you provide us with any Sensitive Personal Information by telephone, email or by other means, we will treat that information with extra care and confidentiality and always in accordance with this Privacy Policy.

You can of course decide if you want to remain anonymous, if you are happy to share your personal details with staff members or if you would like us to share your story with the media or other parties as part of our work.

### *A special note about the Sensitive Personal Information we hold*

Data Protection Law recognises that some categories of personal information are more sensitive. Sensitive Personal Information can include information about a person's health, ethnicity, ethnic origin, political opinions, sex life, sexual orientation or religious beliefs.

If you contact us at GREC through our contact number or in other more general communications with us such as website or emails, you may choose to provide details of a sensitive nature.

We will only use this information:

- For the purposes of dealing with your enquiry, training, and quality monitoring or evaluating the services we provide.
- We will not pass on your details to anyone else without your express permission except in exceptional circumstances. Examples of this might include anyone reporting serious self-harm or posing a threat to others or children contacting us and sharing serious issues such as physical abuse or exploitation.
- Where you have given us your express consent or otherwise clearly indicated to us.

## Legal basis for using your information

In some cases, we will only use your personal information where we have your consent or because we need to use it in order to fulfil a contract with you (for example, because you have requested a quote for translation).

However, there are other lawful reasons that allow us to process your personal information and one of those is called 'legitimate interests'. This means that the reason that we are processing information is because there is a legitimate interest for GREC to process your information to help us to achieve our vision of ensuring that everyone experiencing discrimination gets appropriate advice and support.

Whenever we process your Personal Information under the 'legitimate interest' lawful basis we make sure that we take into account your rights and interests and will not process your personal information if we feel that there is an imbalance.

Some examples of where we have a legitimate interest to process your Personal Information are where we contact you about our work in order to improve our services, to produce research data, for our legal purposes (for example, dealing with complaints and claims), or for complying with guidance from the Office of the Scottish Charity Regulator (OSCR).

## Marketing

We will only contact you about our work and how you can support GREC by phone, email or text message, if you have agreed for us to contact you in this manner.

However, if you have provided us with your postal address we may send you information about our work and how you can support GREC by mail unless you have told us that you would prefer not to hear from us in that way.

You can update your choices or stop us sending you these communications at any time by contacting [info@grec.co.uk](mailto:info@grec.co.uk) or clicking the unsubscribe link at the bottom of the relevant communication.

## Sharing your information

The personal information we collect about you will mainly be used by our staff (and volunteers) at GREC so that they can support you.

We will never sell or share your personal information with organisations so that they can contact you for any marketing activities. Nor do we sell any information about your web browsing activity.

### *Legal disclosure*

We may disclose your information if required to do so by law (for example, to comply with applicable laws, regulations and codes of practice or in response to a valid request from a competent authority); or, in order to enforce our conditions of sale and other agreements.

## Keeping your information safe

We take looking after your information very seriously. We've implemented appropriate physical, technical and organisational measures to protect the personal information we have under our control, both on and off-line, from improper access, use, alteration, destruction and loss.

Unfortunately the transmission of information using the internet is not completely secure. Although we do our best to protect your personal information sent to us this way, we cannot guarantee the security of data transmitted to our site.

Our websites may contain links to other sites. While we try to link only to sites that share our high standards and respect for privacy, we are not responsible for the content or the privacy practices employed by other sites. Please be aware that advertisers or Web sites that have links on our site may collect personally identifiable information about you. This privacy statement does not cover the information practices of those websites or advertisers.

## How long we hold your information for

We only keep it as long as is reasonable and necessary for the relevant activity, which may be to fulfil statutory obligations (for example, the collection of Gift Aid).

## Your rights

You have various rights in respect of the personal information we hold about you – these are set out in more detail below. If you wish to exercise any of these rights or make a complaint, you can do so by contacting our Admin team at GREC; 41 Union Street Aberdeen AB11 5BN, by email at [info@grec.co.uk](mailto:info@grec.co.uk) and by phone on 01224 595505. You can also make a complaint to the data protection supervisory authority, the Information Commissioner's Office, <https://ico.org.uk/>

Your rights:

- **Access to your personal information:** You have the right to request access to a copy of the personal information that we hold about you, along with information on what personal information we use, why we use it, who we share it with, how long we keep it for and whether it has been used for any automated decision making. You can make a request for access free of charge. Please make all requests for access in writing, and provide us with evidence of your identity.
- **Right to object:** You can object to our processing of your personal information 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. You also have the right to object where we are processing your personal information for direct marketing purposes. Please contact us as noted above, providing details of your objection.
- **Consent:** If you have given us your consent to use personal information (for example, for marketing), you can withdraw your consent at any time.
- **Rectification:** You can ask us to change or complete any inaccurate or incomplete personal information held about you.
- **Erasure:** You can ask us to delete your personal information where it is no longer necessary for us to use it, you have withdrawn consent, or where we have no lawful basis for keeping it.

- **Portability:** You can ask us to provide you or a third party with some of the personal information that we hold about you in a structured, commonly used, electronic form, so it can be easily transferred.
- **Restriction:** You can ask us to restrict the personal information we use about you where you have asked for it to be erased or where you have objected to our use of it.
- **No automated-decision making:** Automated decision-making takes place when an electronic system uses personal information to make a decision without human intervention. You have the right not to be subject to automated decisions that will create legal effects or have a similar significant impact on you, unless you have given us your consent, it is necessary for a contract between you and us or is otherwise permitted by law. You also have certain rights to challenge decisions made about you. We do not currently carry out any automated decision-making.

Please note, some of these rights only apply in certain circumstances and we may not be able to fulfil every request.