



John Pollock Centre
Mainholm Road
Ayr
KA8 0QD

01292 270864

info@sacommunitytransport.org

Data Protection policy

Overview

Key details

- Policy prepared by: Catriona Haston
- Approved by Board/committee on: 30/05/2018
- Next review date: 30th May 2020

Introduction

In order to operate, SACT needs to gather, store and use certain forms of information about individuals. These can include members, employees, contractors, suppliers, volunteers, business contacts and other people the group has a relationship with or regularly needs to contact.

This policy explains how this data should be collected, stored and used in order to meet SACT's data protection standards and comply with the General Data Protection Regulations (GDPR).

Why is this policy important?

This policy ensures that SACT

- Protects the rights of our members, volunteers and clients
- Complies with data protection law and follows good practice
- Protects SACT from the risks of a data breach

Who and what does this policy apply to?

This applies to *all* those handling data on behalf of SACT e.g.:

- Committee members
- Employees and volunteers
- Members
- Contractors and/or 3rd party suppliers





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It applies to all data that SACT holds relating to individuals, including:

- Names
- Email addresses
- Postal addresses
- Phone numbers
- Any other personal information held (e.g. financial)

Roles and responsibilities

SACT is the Data Controller and will determine what data is collected and how it is used. The Data Protection Officer for SACT is Catriona Haston. They, together with the trustees, are responsible for the secure, fair and transparent collection and use of data by SACT. Any questions relating to the collection or use of data should be directed to the Data Protection Officer.

Everyone who has access to data as part of SACT has a responsibility to ensure that they adhere to this policy.

Data Protection Principles

a) We fairly and lawfully process personal data in a transparent way

SACT will only collect data where lawful and where it is necessary for the legitimate purposes of the company.

- Group or individual name and contact details will be collected on taking out membership, and will be used to contact the member regarding group membership administration and activities. Other data may also subsequently be collected in relation to their membership, including for payment. Where possible SACT will anonymise this data
 - Lawful basis for processing this data: Contract (the collection and use of data is fair and reasonable in relation to SACT completing tasks expected as part of the individual's or group' membership).
- The name and contact details of volunteers, employees and contractors will be collected when they work for the organisation, and will be used to contact them regarding administration related to their role.

Further information, including personal financial information and criminal records information may also be collected in specific circumstances where lawful and necessary (in order to process payment to the person or in order to carry out a DBS check).





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- Lawful basis for processing this data: Contract (the collection and use of data is fair and reasonable in relation to SACT completing tasks expected as part of working with the individuals)
 - A group or individual's name and contact details will be collected when they make a booking to hire a bus. This will be used to contact them about their booking
 - Lawful basis for processing this data: Contract (the collection and use of data is fair and reasonable in relation to SACT completing tasks expected as part of the booking)
 - A group or individual's name, contact details and other details may be collected at any time (including when booking buses), with their consent, in order for SACT to communicate with them about and promote SACT's activities.
 - Lawful basis for processing this data: Consent
- b) We only collect and use personal data for specific, explicit and legitimate purposes and will only use the data for those specified purposes**
- When collecting data, SACT will always provide a clear and specific privacy statement explaining to the subject why the data is required and what it will be used for.
- c) We ensure any data collected is relevant and not excessive**
- SACT will not collect or store more data than the minimum information required for its intended purpose.
- d) We ensure data is accurate and up-to-date**
- SACT will ask members, volunteers and staff to check and update their data on an annual basis. Any individual will be able to update their data at any point by contacting the Data Protection Officer
- e) We ensure data is not kept longer than necessary**
- SACT will keep records for no longer than is necessary in order to meet the intended use for which it was gathered (unless there is a legal requirement to keep records)
 - The storage and intended use of data will be reviewed in line with SACT's data retention policy. When the intended use is no longer applicable (e.g. contact details for a member who has left the organisation), the data will be deleted within a reasonable period





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f) We keep personal data secure

- SACT will ensure that data held by us is kept secure
- Electronically-held data will be held within a password-protected and secure environment
- Passwords for electronic data files will be re-set each time an individual with data access leaves their role/position
- Physically-held data (e.g. membership forms or email sign-up sheets) will be stored in a locked cupboard
- Keys for locks securing physical data files should be collected by the Data Protection Officer from any individual with access if they leave their role/position. The codes on combination locks should be changed each time an individual with data access leaves their role/position
- Access to data will only be given to relevant trustees/committee members where it is clearly necessary for the running of the group. The Data Protection Officer will decide in what situations this is applicable and will keep a master list of who has access to data

g) Transfer to countries outside the EEA

- SACT will not transfer data to countries outside the European Economic Area (EEA), unless the country has adequate protection for the individual's data privacy rights.

Individual Rights

When SACT collects, holds and uses an individual's personal data that individual has the following the rights over that data. SACT will ensure its data processes comply with those rights and will make all reasonable efforts to fulfil requests from an individual in relation to those rights.

Rights

- *Right to be informed:* whenever SACT collects data it will provide a clear and specific privacy statement explaining why it is being collected and how it will be used
- *Right of access:* individuals can request to see the data SACT holds on them and confirmation of how it is being used. Requests should be made in writing to the Data Protection Officer and will be complied with free of charge and within one month. Where requests are complex or numerous this may be extended to two months
- *Right to rectification:* individuals can request that their data be updated where it is inaccurate or incomplete. SACT will request that members, staff and contractors check and update their data on an annual basis. Any requests for data to be updated will be processed within one month.





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- *Right to object:* individuals can object to their data being used for a particular purpose. SACT will always provide a way for an individual to withdraw consent in all marketing communications. Where we receive a request to stop using data we will comply unless we have a lawful reason to use the data for legitimate interests or contractual obligation
- *Right to erasure:* individuals can request for all data held on them to be deleted. SACT's data retention policy will ensure data is not held for longer than is reasonably necessary in relation to the purpose it was originally collected. If a request for deletion is made we will comply with the request unless:
 - There is a lawful reason to keep and use the data for legitimate interests or contractual obligation
 - There is a legal requirement to keep the data
- *Right to restrict processing:* individuals can request that their personal data be 'restricted' – that is, retained and stored but not processed further (e.g. if they have contested the accuracy of any of their data, SACT will restrict the data while it is verified).

Though unlikely to apply to the data processed by SACT, we will also ensure that rights related to portability and automated decision making (including profiling) are complied with where appropriate.

Member to Member Contact

SACT will only share members' data with other members with the subject's prior consent.

How we get consent

SACT will occasionally use data from consenting group or individual members for marketing purposes. This includes contacting them for specific promotions, updating them about SACT news, and other activities. Any time data is used for this purpose, SACT will provide:

- A method for users to show their positive and active consent to receive these communications (e.g. a 'tick box')
- A clear and specific explanation of what the data will be used for (e.g. 'Tick this box if you would like SACT to send you email updates with details about our forthcoming promotions and activities')
- Data will only ever be used in the way described and consented to
- Opt-out requests such as this will be processed within 14 days





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SACT Website

- SACT does not use cookies on our website (www.sacommunitytransport.org) in order to monitor and record activity
- SACT will create a link to our Privacy Policy on the website

Data retention policy

Introduction

This policy sets out how SACT will approach data retention and establishes processes to ensure we do not hold data for longer than is necessary.

It forms part of SACT's Data Protection Policy.

Roles and responsibilities

SACT is the Data Controller and will determine what data is collected, retained and how it is used. The Data Protection Officer for SACT is Catriona Haston. She, together with the trustees are responsible for the secure and fair retention and use of data by SACT. Any questions relating to data retention or use of data should be directed to the Data Protection Officer.

Regular Data Review

A regular review of all data will take place to establish if SACT still has good reason to keep and use the data held at the time of the review. As a general rule a data review will be held every 2 years and no more than 27 calendar months after the last review. The next review will take place on May 30th 2019.

Data to be reviewed

- SACT stores data on digital documents (e.g. spreadsheets) stored on computers linked to a shared storage drive
- SACT also stores hard copies of data in files kept in cupboards which are securely locked when not in use





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Who the review will be conducted by

- The review will be conducted by the Data Protection Officer with other SACT officials to be decided on at the time of the review.

How data will be deleted

- Physical data will be destroyed safely and securely, including shredding
- All reasonable and practical efforts will be made to remove data stored digitally
 - Priority will be given to any instances where data is stored in active lists (e.g. where it could be used) and to sensitive data
 - Where deleting the data would mean deleting other data that we have a valid lawful reason to keep (e.g. on old emails) then the data may be retained safely and securely but not used

Criteria

The following criteria will be used to make a decision about what data to keep and what to delete.

Question	Action	
	Yes	No
Is the data stored securely?	No action necessary	Update storage protocol in line with Data Protection policy
Does the original reason for having the data still apply?	Continue to use	Delete or remove data
Is the data being used for its original intention?	Continue to use	Either delete/remove or record lawful basis for use and get consent if necessary
Is there a statutory requirement to keep the data?	Keep the data at least until the statutory minimum no longer applies	Delete or remove the data unless we have reason to keep the data under other criteria
Is the data accurate?	Continue to use	Ask the subject to confirm/update details
Where appropriate do we have consent to use the data. This consent could be implied	Continue to use	Get consent





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by previous use and
engagement by the individual

Can the data be anonymised

Anonymise data

Continue to use

Statutory Requirements

Data stored by SACT may be retained based on statutory requirements for storing data other than data protection regulations. This might include but is not limited to:

- Details of payments made and received (e.g. in bank statements and accounting records)
- Trustee meeting minutes
- Contracts and agreements with suppliers/customers
- Insurance details
- Tax and employment records

Other data retention procedures

Member data

- When a member leaves SACT and all administrative tasks relating to their membership have been completed, any potentially sensitive data held on them will be deleted
- Unless consent has been given data will be removed from all email mailing lists
- All other data will be stored safely and securely and reviewed as part of the next two year review

Mailing list data

- If an individual opts out of a mailing list their data will be removed as soon as is practically possible.
- All other data will be stored safely and securely and reviewed as part of the next two year review

Volunteer data

- When a volunteer or freelancer stops working with SACT and all administrative tasks relating to their work have been completed, any potentially sensitive data held on them will be deleted – this might include bank details or medical data
- Unless consent has been given, data will be removed from all email mailing lists





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- All other data will be stored safely and securely and reviewed as part of the next two year review

Other data

- All other data will be included in a regular two year review

