



## **Data Protection**

Barrhill Community Interest Company (BCIC) needs to collect and retain certain types of personal data, in various formats, for administrative and legal purposes so that it can fulfil its functions as a Community Interest Company. This includes undertaking work in the communities' interest, being able to fulfil its obligations to the community (particularly funding applications) and as part of its role.

### **This statement describes:**

- the purposes for which the information is collected.
- BCIC's obligations in processing the data.
- Your rights as individuals afforded under the Data Protection Act 2018 (DPA) the General Data Protection Regulation (GDPR) 2018 and the UK (GDPR) January 31<sup>st</sup> 2020.

### **Types of information BCIC may collect**

***BCIC will only process data which you have consented to provide***

In law, personal data is recognised in two forms:

- **personal data** (as defined in the GDPR) which includes, for example, names, addresses and other contact details, age, gender and photographic images, information relating to family, lifestyle and social circumstances, education and training details, employment details, financial details and other information.
- **sensitive personal data** (which is a special category of Personal Data which is specifically defined in the GDPR) and includes: genetic information, physical or mental health condition, racial or ethnic origin, sexuality, political opinion, religious or other beliefs of a similar nature, trade union membership and criminal offences.

BCIC does not collect or retain sensitive/special category personal data.

### **Purposes for which BCIC may use the information**

Personal Information held by BCIC by individual consent may be used for purposes associated with:

- maintenance of BCIC activity and account records.
- administration of membership records.
- internal monitoring.
- managing employees and volunteers.
- Equal Opportunities monitoring.

- being able to contact grant applicants (current and past).
- informing BCIC on community needs.
- paying funding to individuals/groups / organisations bank accounts.
- communicating with members details of news, events, activities, or services related to BCIC.
- contacting members via surveys to identify needs or seek feedback on current projects or future projects or services.

### **Data Protection Obligations**

The DPA and GDPR require that any personal data held should be:

- processed fairly and lawfully.
- obtained and processed only for specified and lawful purposes.
- adequate, relevant, and not excessive.
- accurate and kept up to date.
- held securely and for no longer than is necessary.

### **Third Parties**

Your Personal Data is strictly confidential. BCIC does not provide data to individuals or other organisations unless we are required to by law or there is a legitimate reason i.e., OSCR Scotland (the Scottish Charity Regulator).

### **Data Storage**

All the data BCIC holds is held secure either under lock & key or password protected on our servers, which are backed up. Only those who work in the BCIC office and Trustees have access to this for legitimate purposes.

### **Data Retention**

BCIC will not keep personal data longer than is necessary considering the purposes for which that data was originally collected, held and processed. When judging the retention of data, we consider:

- the current and future need of the information.
- the costs, risks and liabilities associated with retaining the information; and
- the ease or difficulty of making sure it remains accurate and up to date.

BCIC will conduct a regular audit of records to ensure that the Trust is not holding onto personal data for too long or deleting it prematurely. When personal data is no longer required all reasonable steps will be taken to erase or otherwise dispose of it without delay.

### **Your Rights and Data Information Requests**

Under the DPA 2018 and GDPR 2016 it is your right to see all information which BCIC currently holds on you via a 'Subject Access Report'. If you would like to see any information that we hold on you, you

must request this in writing to the BCIC office at BCIC, Barrhill Memorial Hall, Main Street, Barrhill KA26 0PP.

BCIC must respond to your request within 30 days or within 60 if it is a complex request under the GDPR. If the request is complex BCIC may make a charge for appropriate administration costs.

You also have the right to complain to the Information Commissioners Office (ICO) if you feel like your rights under the GDPR have not been met.