



PRIVACY CONTENTS

CLAUSE

I.	Important information and who we are.....	1
2.	The types of personal data we collect about you.....	2
3.	How is your personal data collected?	2
4.	How we use your personal data	3
5.	Disclosures of your personal data.....	5
6.	International transfers.....	6
7.	Data security.....	6
8.	Data retention	6
9.	Your legal rights	7
10.	Contact details	8
II.	Complaints	8
12.	Changes to the privacy notice and your duty to inform us of changes	9
13.	Third-party links.....	9
14.	Privacy Statement for Applicants and Contractors	10

Introduction

PRIVACY NOTICE

This privacy notice sets out how Charity Leadership Scotland uses and protects your personal data.

1. **IMPORTANT INFORMATION AND WHO WE ARE** (paragraph 1J
2. **TYPES OF PERSONAL DATA WE COLLECT ABOUT YOU** (paragraph 2)
3. **HOW IS YOUR PERSONAL DATA COLLECTED?** (paragraph 3)
4. **HOW WE USE YOUR PERSONAL DATA** (paragraph 4)
5. **DISCLOSURES OF YOUR PERSONAL DATA** (paragraph 5)
6. **INTERNATIONAL TRANSFERS** (paragraph 6)
7. **DATA SECURITY** (paragraph 7)
8. **DATA RETENTION** (paragraph 8)
9. **YOUR LEGAL RIGHTS** (paragraph 9)
10. **CONTACT DETAILS** (paragraph 10)
11. **COMPLAINTS** (paragraph 11)
12. **CHANGES TO THE PRIVACY NOTICE AND YOUR DUTY TO INFORM US OF CHANGES** (paragraph 12}
13. **THIRD PARTY LINKS** (paragraph 13}

1. Important information and who we are

Privacy notice

This privacy notice gives you information about how Charity Leadership Scotland collects and uses your personal data through your use of this website, including any data you may provide when you become a member and/or trustee and/or register with us or sign up to our newsletter and/or purchase a product or

service and/or take part in a competition and/or take part in or attend a meeting run by Charity Leadership Scotland or group or lead or groups promoting Charity Leadership Scotland and its activities..

We ask you to be aware that any personal data that you give us at public events may be used by third parties attending those events, over which Charity Leadership Scotland has no control.

This website is not intended for children and we do not knowingly collect data relating to children.

Controller

Charity Leadership Scotland (Company number 211359) is the controller and responsible for your personal data (collectively referred to as "Charity Leadership Scotland", "we", "us" or "our" in this privacy notice).

If you have any questions about this privacy notice, including any requests to exercise your legal rights (paragraph 91, please contact us using the information set out in the contact details section (paragraph 10).

2. The types of personal data we collect about you

Personal data means any information about an individual from which that person can be identified.

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

- **Identity Data** includes first name, last name, any previous names, username or similar identifier, marital status, title, date of birth and gender.
- **Contact Data** includes billing address, delivery address, email address and telephone numbers.
- **Financial Data** includes bank account and payment card details.
- **Transaction Data** includes details about payments to and from you and other details of products and services you have purchased from us.
- **Technical Data** N/ A.
- **Profile Data** N/ A.
- **Usage Data** includes information about how you interact with and use our website, products and services.
- **Marketing and Communications Data** includes your preferences in receiving marketing from us and our third parties and your communication preferences.

We also collect, use and share aggregated data such as statistical or demographic data which is not personal data as it does not directly (or indirectly) reveal your identity. For example, we may aggregate individuals' Usage Data to calculate the percentage of users accessing a specific website feature or page.

3. How is your personal data collected?

We use different methods to collect data from and about you including through:

- **Your interactions with us.** You may give us your personal data by filling in online forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:

- apply for our products or services or to attend one of our meetings/delegations;
- subscribe to our service or publications;
- request marketing to be sent to you;
- enter a competition, promotion or survey; or
- give us feedback or contact us.
- **Automated technologies or interactions.** As you interact with our website, we will automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, server logs and other similar technologies.
- **Third parties or publicly available sources.** We may receive personal data about you from various third parties in the course of our activities and may obtain your details from, for example, business cards, event delegate lists, conversations, referrals and recommendations. We also undertake desk-based research using publicly available sources to identify social sector leaders who may be interested in being part of Charity Leadership Scotland. If we obtain your details in this way, we will inform you that we have obtained your details and inform you of Charity Leadership Scotland's services, activities and offers. We will make it clear how to object to the processing of your data and you may unsubscribe from further contact at any time.
- Technical Data may be collected from the following parties:
 - analytics providers
 - advertising networks
 - search information providers
 - Wordpress.com
 - CookieYes.com

Please also refer to **How We Use Cookies** below.

4. **How we use your personal data**

Legal basis

The law requires us to have a legal basis for collecting and using your personal data. We rely on one or more of the following legal bases:

- **Performance of a contract with you:** Where we need to perform the contract we are about to enter into or have entered into with you.
- **Legitimate interests:** We may use your personal data where it is necessary to conduct our business and pursue our legitimate interests, for example to prevent fraud and enable us to give you the best and most secure customer experience. We make sure we consider and balance any potential impact on you and your rights (both positive and negative) before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law).
- **Legal obligation:** We may use your personal data where it is necessary for compliance with a legal obligation that we are subject to. We will identify the relevant legal obligation when we rely on this legal basis.

- **Consent:** We rely on consent only where we have obtained your active agreement to use your personal data for a specified purpose, for example if you subscribe to an email newsletter.

Use of your personal data

Charity Leadership Scotland holds and processes your personal data for the following purposes, as applicable:

1. Managing your membership and/or network participation
2. Managing your rights under our Articles of Association
3. Managing your access to our website through use of cookies
4. Managing your access to our services, programme and member benefits (to include partaking in prize draws, competitions and completing surveys)
5. Managing your access to our networks, communications and events
6. Forwarding details to specific third party partners/advisers/other members only when requested by you (e.g. in relation to our services, events, programmes or requests for professional advice/support)
7. Sending you information we reasonably believe may be of interest to you
8. Seeking information about you/your organisation/your views
9. Generally managing our relationship with you
10. Allowing us to administer and protect our business and this website (which might include, without limitation, trouble shooting, data analysis, testing, system maintenance, support reporting)

Direct marketing

During your use of our website when your personal data is collected, you will be asked to indicate your preferences for receiving direct marketing communications from us. You will receive marketing communications from us if you have requested information from us and you have not opted out of receiving the marketing.

Third-party marketing

We will get your express consent before we share your personal data with any third party for their own direct marketing purposes.

Opting out of marketing

You can ask us to stop sending you marketing communications at any time by emailing us at events@charityleadership.scot. You can also adjust your marketing preferences by following the opt-out links within any marketing communication sent to you, or by writing to us at the address set out at 10 below.

If you opt out of receiving marketing communications, you will still receive service-related communications that are essential for administrative or customer service purposes.

How We Use Cookies

We use cookies and similar technologies to make our website work, to understand how people use it, and to improve the services we provide to our community.

When you first visit our site, you'll be asked whether you'd like to accept or reject non-essential cookies. We won't set analytics or marketing cookies unless you actively choose to allow them.

You can update your preferences or withdraw consent at any time by clicking "Manage Cookies" on our website or through your browser settings. We use CookieYes.com to help manage this process. You can view their privacy policy [here](#).

Types of cookies we use:

- **Essential cookies** - These are needed to keep our site secure and functional (for example, remembering your cookie choices).
- **Analytics cookies** - Help us understand which pages are most popular so we can improve our content. We use anonymised data only.
- **Third-party cookies** - Some pages include content from other services (for example, YouTube videos, Google Maps). These services may set their own cookies if you allow them.

We do not sell, trade, or share your personal information with anyone. Any data we collect is used only to support and improve the work that we do.

If you'd like more details about the cookies we use or how we protect your data, please contact us at office@charityleadership.scot

5. Disclosures of your personal data

We may share your personal data with carefully selected partners only ("Facilitators") where necessary for us to fulfil any obligations we have to you. A list of these Facilitators may be obtained by writing to our data protection officer whose address is below.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes

and only permit them to process your personal data for specified purposes and in accordance with our instructions.

6. International transfers

We may transfer your personal data to service providers that carry out certain functions on our behalf. This may involve transferring personal data outside the UK to countries which have laws that do not provide the same level of data protection as the UK law.

Whenever we transfer your personal data out of the UK to service providers, we ensure a similar degree of protection is afforded to it by ensuring that the following safeguards are in place:

- 7. We will only transfer your personal data to countries that have been deemed by the UK to provide an adequate level of protection for personal data and where there is an appropriate contract in place to protect such personal data between Charity Leadership Scotland and the relevant party; namely a bespoke contract or appropriate, agreed standard terms and conditions. Data security**

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

8. Data retention

How long will you use my personal data for?

We will only retain your personal data for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

To determine the appropriate retention period for personal data, we consider the amount, nature and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your

personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and to comply with any other legal requirements.

In some circumstances you can ask us to delete your data: see below for further information.

In some circumstances we will anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes, in which case we may use this information indefinitely without further notice to you.

9. **Your legal rights**

You have a number of rights under data protection laws in relation to your personal data.

You have the right to:

- Request access to your personal data (commonly known as a "subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.
- Request correction of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.
- Request erasure of your personal data in certain circumstances. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.
- Object to processing of your personal data where we are relying on a legitimate interest (or those of a third party) as the legal basis for that particular use of your data (including carrying out profiling based on our legitimate interests). In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your right to object.
- You also have the absolute right to object any time to the processing of your personal data for direct marketing purposes (see above).
- Request the transfer of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.
- Withdraw consent at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.
- Request restriction of processing of your personal data. This enables you to ask us to suspend the processing of your personal data in one of the following scenarios:
 - If you want us to establish the data's accuracy;
 - Where our use of the data is unlawful but you do not want us to erase it;

- Where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or
- You have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

If you wish to exercise any of the rights set out above, please contact us using the contact details set out below.

No fee usually required

You will not have to pay a fee to access your personal data (orto exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we could refuse to comply with your request in these circumstances.

What we may need from you

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

Time limit to respond

We try to respond to all legitimate requests within one month. Occasionally, it could take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

10. Contact details

If you have any questions about this privacy notice or about the use of your personal data or you want to exercise your privacy rights, please contact us as follows:

- **Charity Leadership Scotland**
- **Data Privacy Manager, Lucinda Godfrey**
- Greyfriars Charteris Centre
- 138-140 Pleasance
- Edinburgh, EH8 9RR
- office@charitvleadership.scot

n. Complaints

You have the right to make a complaint at anytime to the Information Commissioner's Office (ICO), the UK regulator for data protection issues (www.ico.org.uk). We would, however, appreciate the

chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

12. Changes to the privacy notice and your duty to inform us of changes

We keep our privacy notice under regular review. This version was last updated on October 2025.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us, for example a new address or email address.

13. Third-party links

This website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about notices. We do not control these third-party websites and are not responsible for their privacy notice. When you leave our website, we encourage you to read the privacy notice of every website you visit.

UK GDPR Privacy Notice for Applicants and Contractors

What is the purpose of this document?

Charity Leadership Scotland (Company number 211359) is the controller and responsible for your personal data (collectively referred to as "Charity Leadership Scotland", "we", "us" or "our" in this privacy notice).

We are fully committed to protecting the privacy and security of your personal information.

This privacy notice describes how we collect and use personal information about you during and after your working relationship with us, in accordance with the UK General Data Protection Regulation (UK GDPR). It applies to all contractors, who are not directly engaged by Charity Leadership Scotland to perform services on its behalf but or on premises controlled by Charity Leadership Scotland ("Contractors") or applicants applying directly to Charity Leadership Scotland to be engaged by Charity Leadership Scotland (prior to any such engagement) ("Applicants") (together, Applicants and Contractors shall be "Subjects").

- 1.1 Charity Leadership Scotland is a "controller". This means that we are responsible for deciding how we hold and use personal information about you. We are required under data protection legislation to notify you of the information contained in this privacy notice.
- 1.2 This notice applies to current and former Subjects. This notice does not form part of any contract of employment or other contract to provide services or any other agreement between us. We may update this notice at any time but if reasonably required to do so, we will provide you with an updated copy of this notice as soon as reasonably practical.
- 1.3 It is important that you read and retain this notice, together with any other privacy notice we may provide on specific occasions when we are collecting or processing personal information about you, so that you are aware of how and why we are using that information and what your rights are under the data protection legislation.

2. Data protection principles

We will comply with data protection law, which says that the personal information we hold about you must be:

1. Used lawfully, fairly and in a transparent way.
2. Collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes.
3. Relevant to the purposes we have told you about and limited only to those purposes.
4. Accurate and kept up to date.
5. Kept only as long as necessary for the purposes we have told you about.
6. Kept securely.

3. The kind of information we hold about you

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the person's identity has been removed (anonymous data). There are certain types of more sensitive personal data which require a higher level of protection, such as information about a person's health, sexual orientation or criminal convictions.

3.1 We may collect, store and use the following categories of personal information about you, which, depending on your status as Applicant or Contractor:

- (a) Personal contact details such as title, addresses, and personal email addresses.
- (b) Date of birth.
- (c) Gender.
- (d) Marital status and dependants.
- (e) Next of kin and emergency contact information.
- (f) National Insurance number.
- (g) Bank account details, payroll records and tax status information.
- (h) Salary, annual leave, pension and benefits information.
- (i) Start date and, if different, the date of your continuous employment.
- (j) Leaving date and your reason for leaving.
- (k) Location of employment or workplace.
- (l) Copy of driving licence.
- (m) Recruitment information (including copies of right to work documentation, references and other information included in a CV or cover letter or as part of the application process).
- (n) Employment records (including job titles, work history, working hours, holidays, training records and professional memberships).
- (o) Compensation history.
- (p) Performance information
- (q) Disciplinary and grievance information.
- (r) Information about your use of our information and communications systems.

3.2 We may also collect, store and use some or all of the following more sensitive types of personal information belonging to Applicants:

- (a) Information about your health, including any medical condition and sickness records, including:
 - (i) where you leave employment and the reason for leaving is determined to be ill health, injury or disability, the records relating to that decision;
 - (ii) details of any absences (other than holidays) from work including time on statutory parental leave and sick leave; and

- (iii) any health information in relation to a claim made under the permanent health insurance scheme; and
- (iv) where you leave employment and the reason for leaving is related to your health, information about that condition needed for pensions purposes.

(b) Information about criminal convictions and offences.

4. How is your personal information collected?

4.1 We collect personal information about Applicants through the application, recruitment, engagement (or similar) process, as appropriate, to each Applicant (“Engagement Process”), directly from the Applicant, themselves, or, sometimes, indirectly from very carefully selected third parties as relevant to the Applicant or the Applicant’s potential role in Charity Leadership Scotland (“Third Parties”). These Third Parties may include employment agencies, background check providers, former employers, credit reference agencies.

5. How we will use information about you

We will only use your personal information when the law allows us to. Most commonly, we will use your personal information in the following circumstances:

1. Where we need to perform the contract we have entered into with you.
2. Where we need to comply with a legal obligation.
3. Where it is necessary for legitimate interests pursued by us or a third party and your interests and fundamental rights do not override those interests.

We may also use your personal information in the following situations, which are likely to be rare:

1. Where we need to protect your interests (or someone else's interests).
2. Where it is needed in the public interest or for official purposes.

6. Situations in which we will use your personal information

6.1 For Applicants, we need all the categories of information in the list above primarily to allow us to perform our contract with you and to enable us to comply with legal obligations. In some cases we may use your personal information to pursue legitimate interests, provided your interests and fundamental rights do not override those interests. The situations in which we will process your personal information are listed below. We have indicated by asterisks the purpose or purposes for which we are processing or will process your personal information, as well as providing a description of which categories of data are involved. Where a legitimate interest is involved, we state what the legitimate interest is.

- (a) Making a decision about your recruitment or appointment. This will include, without limitation your application form, CV, whether special arrangements need to be made for you and any other information you provide us or we ascertain from third parties; e.g. references.
- (b) Determining the terms on which you work for or assist us.
- (c) Determining whether your engagement is deemed employment for the purposes of Chapter 10 of Part 2 of the Income Tax (Earnings and Pensions) Act 2003 (ITEPA 2003) and providing

you with a status determination statement in accordance with the applicable provisions of ITEPA 2003.

- (d) Checking you are legally entitled to work in the UK.
- (e) Paying you and, if you are an employee or deemed employee for tax purposes, deducting tax and National Insurance contributions (NICs).
- (f) Providing any benefits to you to which you are entitled.
- (g) Enrolling you in a pension arrangement in accordance with our statutory automatic enrolment duties.
- (h) Liaising with the trustees or managers of a pension arrangement operated by us, your pension provider and any other provider of employee benefits.
- (i) Administering the contract or arrangement we have entered into with you.
- (j) Business management and planning, including accounting and auditing.
- (k) Conducting performance reviews, managing performance and determining performance requirements.
- (l) Making decisions about salary reviews and compensation.
- (m) Assessing qualifications for a particular job or task, including decisions about promotions.
- (n) Education, training and development requirements.
- (o) Ascertaining your fitness to work.
- (p) Complying with health and safety obligations.
- (q) To prevent fraud.
- (r) To monitor your use of our information and communication systems to ensure compliance with our IT policies.
- (s) To ensure network and information security, including preventing unauthorised access to our computer and electronic communications systems and preventing malicious software distribution.
- (t) To conduct data analytics studies to review and better understand Applicant retention and attrition rates.
- (u) Equal opportunities monitoring.

6.2 Some of the above grounds for processing will overlap and there may be several grounds which justify our use of your personal information.

7. If you fail to provide personal information

7.1 If you fail to provide certain information when requested, we may be prevented from complying with certain legal obligations.

8. Change of purpose

8.1 We will only use your personal information for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If we need to use your personal information for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

8.2 Please note that we may process your personal information without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

9. How we use particularly sensitive personal information

For Applicants, special categories of particularly sensitive personal information, such as information about your health, racial or ethnic origin, sexual orientation, or trade union membership, require higher levels of protection. We need to have further justification for collecting, storing and using this type of personal information. We have in place an appropriate policy document and safeguards which we are required by law to maintain when processing such data. We may process special categories of personal information in the following circumstances:

1. In limited circumstances, with your explicit written consent.
2. Where we need to carry out our legal obligations.
3. Where it is needed in the public interest, such as for equal opportunities monitoring.
4. Where it is necessary to protect you or another person from harm.

Less commonly, we may process this type of information where it is needed in relation to legal claims or where it is needed to protect your interests (or someone else's interests) and you are not capable of giving your consent, or where you have already made the information public.

10. Automated decision-making and Profiling for Applicants

Automated Decision Making and Profiling – Are They the Same?

No, while automated decision making may and, often does include profiling, it doesn't always. So what's the difference?

Automated Decision Making

Automated decision-making takes place when an electronic system uses personal information to make a decision without human involvement/intervention.

Profiling

Based on the traits of others who appear similar, we may use profiling to:

- find something out about individuals' preferences;
- predict their behaviour; and/or
- make decisions about them.

Why?

This might be relevant in:

- Determining who gets an interview, a job, a promotion, or employment discipline
- Displaying ads for a user on a website or social media feed
- Using pre-programmed algorithms and criteria for recruitment aptitude tests
- Marketing decisions
- Customer relationship management
- Recommendation systems

- Automation efficiency

We are allowed to use automated decision-making and profiling in the following circumstances:

1. Where we have notified you of the decision and given you one month to request a reconsideration.
2. Where it is necessary to perform the contract with you and appropriate measures are in place to safeguard your rights.
3. In limited circumstances, with your explicit written consent and where appropriate measures are in place to safeguard your rights.

Important: Please Note

If we make an automated decision or a profile on the basis of any particularly sensitive personal information, we must have either your explicit written consent or it must be justified in the public interest, and we must also put in place appropriate measures to safeguard your rights.

1.2 You will not be subject to decisions that will have a significant impact on you based solely on automated decision-making or profiling, unless we have a lawful basis for doing so and we have notified you.

1.3 We do not envisage that any decisions will be taken about you using automated means or profiling.

1.4 Of course, we will notify you in writing if this position changes.

1.5

Transferring information outside the UK

We may transfer your personal data to service providers that carry out certain functions on our behalf. This may involve transferring personal data outside the UK to countries which have laws that do not provide the same level of data protection as the UK law.

Whenever we transfer your personal data out of the UK to service providers, we ensure a similar degree of protection is afforded to it by ensuring that the following safeguards are in place:

We will only transfer your personal data to countries that have been deemed by the UK to provide an adequate level of protection for personal data and where there is an appropriate contract in place to protect such personal data between Charity Leadership Scotland and the relevant party; namely a bespoke contract or appropriate, agreed standard terms and conditions.

Data security

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need

to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

1.6

11. Data security

We have put in place measures to protect the security of Applicants' information. Details of these measures will be made available to you, within 28 days upon receipt of your request by our Data Privacy Manager at the address (defined as the **DP Address**):

Charity Leadership Scotland

Data Privacy Manager, Lucinda Godfrey

Greyfriars Charteris Centre

138-140 Pleasance

Edinburgh, EH8 9RR

office@charityleadership.scot

Third parties dealing with your request will only process your personal information on our instructions and where they have agreed to treat the information confidentially and to keep it secure.

11.1 We have put in place appropriate security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. Additionally, we limit access to your personal information to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal information on our instructions and they are subject to a duty of confidentiality.

11.2 We have put in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so.

12. Data retention as it applies to Applicants

How long will you use my information for?

12.1 We will only retain your personal information for as long as necessary to fulfil the purposes for which we collected it, including for the purposes of satisfying any legal, accounting or reporting requirements. Details of retention periods for different aspects of your personal information are available upon receipt of your correspondence at the DP Address.

12.2 To determine the appropriate retention period for personal data, we consider:

- (a) The amount, nature and sensitivity of the personal data.
- (b) The potential risk of harm from unauthorised use or disclosure of your personal data.
- (c) The purposes for which we process your personal data and whether we can achieve those purposes through other means.
- (d) The applicable legal requirements.

12.3 In some circumstances, we may anonymise your personal information so that it can no longer be associated with you, in which case we may use that information without further notice to you. Once you are no longer an Applicant, we will retain and securely destroy your personal information in accordance with applicable laws and regulations.

13. Rights of access, correction, erasure and restriction for Applicants

Your duty to inform us of changes

13.1 It is important that the personal information we hold about you is accurate and current. Please keep us informed if your personal information changes during your working relationship with us.

Your rights in connection with personal information

13.2 Under certain circumstances, by law you have the right to:

- (a) **Request access** to your personal information (commonly known as a data subject access request). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.
- (b) **Request correction** of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.
- (c) **Request erasure** of your personal information. This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal information where you have exercised your right to object to processing (see below).
- (d) **Object to 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.
- (e) **Request the restriction of processing** of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.
- (f) **Request the transfer** of your personal information to another party.

13.3 If you want to review, verify, correct or request erasure of your personal information, object to the processing of your personal data, or request that we transfer a copy of your personal information to another party, please contact the data privacy manager in writing.

No fee usually required

13.4 You will not have to pay a fee to access your personal information (or to exercise any of the other rights). However, we may charge a reasonable fee if your request for access is clearly unfounded or excessive. Alternatively, we may refuse to comply with the request in these circumstances.

What we may need from you

- 13.5 We may need to request specific information from you to help us confirm your identity and ensure your right to access the information (or to exercise any of your other rights). This is another appropriate security measure to ensure that personal information is not disclosed to any person who has no right to receive it.

14. Right to withdraw consent

- 14.1 In the limited circumstances where you may have provided your consent to the collection, processing and transfer of your personal information for a specific purpose, you have the right to withdraw your consent for that specific processing at any time. To withdraw your consent, please contact the data privacy manager. Once we have received notification that you have withdrawn your consent, we will no longer process your information for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so in law.

15. Data protection manager

- 15.1 We have appointed a data privacy manager to oversee compliance with this privacy notice. If you have any questions about this privacy notice or how we handle your personal information, please send them to the DP Address and we will respond to you as soon as we can.
- 15.2 You have the right to make a complaint at any time to the Information Commissioner's Office (ICO) with respect to data protection issues. However, we ask you to contact us first, if you have any questions about how we use your data, complaint or grievance, in order that we may answer the question/resolve the issue quickly and efficiently.

16. Changes to this privacy notice

- 16.1 We reserve the right to update this privacy notice at any time, and we will provide you with a new privacy notice when we make any substantial updates. We may also notify you in other ways from time to time about the processing of your personal information.

If you have any questions about this privacy notice, please address them to the Data Privacy Manager – contact details are above.