



## **Introduction**

### **Welcome to our privacy policy**

We respect your privacy and are committed to protecting your personal data. This privacy policy will inform you as to how we look after your personal data and tell you about your privacy rights and how the law protects you.

### **Purpose of this privacy policy**

This privacy policy aims to give you information on how we collect and processes your personal data through your use of this website. This website is not intended for children and we do not knowingly collect data relating to children.

It is important that you read this privacy policy together with any other privacy policy or fair processing policy we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This privacy policy supplements other notices and privacy policies and is not intended to override them.

### **Controller**

Discover Tiree Limited is the controller and responsible for your personal data. If you have any questions about this privacy policy, including any requests to exercise your legal rights, please contact us using the details set out below.

### **Complaints**

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues. We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

### **Changes to this Privacy Notice and your duty to inform us of changes**

We keep this privacy policy under regular review. This version was last updated in September 2018. 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.

### **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 you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy policy of every website you visit.

## **Personal Data we receive**

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 identity has been removed (anonymous data).

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

**Identity data** - including your first name, last name, marital status, title, gender and multi media images;

**Contact data** - including your billing address, delivery address, email address, telephone contact numbers and social media contact information;

**Financial Data** - including bank account and payment card details;

**Transaction Data** - including details about payments from you for membership subscriptions;

**Technical Data** - including internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, and other technology on the devices you use to access this website;

**Profile data** - includes your username and password;

**Usage Data** - including information about how you use our website, products and services.

We also collect and store Aggregated Data such as statistical or demographic data for any purpose. Aggregated Data could be derived from your personal data but is not considered personal data in law as this data will not directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature.

We do not collect any Special Categories of Personal Data about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health, and genetic and biometric data). Nor do we collect any information about criminal convictions and offences.

## **If you fail to provide personal data**

Where we need to collect personal data needed for your membership of Discover Tiree, and you fail to provide that data when requested, we may not be able to process or maintain your listing on the website, and in this case we may have to cancel your membership with Discover Tiree.

## **How is your personal data collected?**

We use different methods to collect data from, and about, you when you;

- express an interest in membership;
- fill in a membership application form or forms;
- correspond with us by post, phone, email or otherwise;
- give us feedback or contacting us.

### **How your personal data will be used?**

We will only use your data in circumstances where the data protection legislation allows us to. Most commonly, we will use your personal data in the following circumstances:

- Where we need to create or maintain your membership;
- Where it is necessary for our legitimate interests and your interests and fundamental rights do not override those interests;
- Where we need to comply with a legal obligation;
- Where we have received your informed and specific consent to do so;
- To manage our relationship with you which will include notifying you about changes to our terms or privacy policy.

### **What we do NOT do with your personal data**

Discover Tiree will not provide your personal data, received in accordance with the terms of this privacy notice, to third parties without your explicit and informed prior consent.

### **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 who have a business need to know. They 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.

### **How long will we use your 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 the applicable legal, regulatory, tax, accounting or other requirements.

By law we have to keep basic information about our members for six years after they cease being members for tax purposes.

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

## **Your Rights**

Under the data protection legislation you have a number of rights with regard to your personal data. You have the right to:

### **Request access to your personal data**

commonly known as a "data 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**

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, 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 and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms.

### **Request restriction of processing of your personal data**

this enables you to ask us to suspend the processing of your personal data in the following circumstances;

- 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.
- You have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

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.

**Identity and contact details of controller and data compliance advisor**

Discover Tiree Limited is the controller of data for the purposes of the data protection legislation. If you have any concerns as to how your data is processed, or any questions about this privacy policy or our privacy practices more generally please contact us.

Contact details:

[louise@tireetrust.org](mailto:louise@tireetrust.org)

Discover Tiree, Units 1&2, The Island Centre, Crossapol, Isle of Tiree, PA77 6UP