

FARE Scotland Privacy Notice

Who are we?

FARE Scotland (referred to in this privacy notice as “we”, “our” and “us”) are committed to protecting the privacy and security of your personal data. Our contact details are:

Name: FARE Scotland

Address: Bannatyne House, 31 Drumlanrig Avenue, Glasgow, G34 0JF

Contact Number: 0141 771 9151

Email: info@fare-scotland.org

This privacy notice outlines how we collect and use your personal information in accordance with the General Data Protection Regulation (GDPR).

We are the data controller. This means that we decide how your personal data is processed and for what purpose. We exercise overall control of your personal data being processed and are in charge of and responsible for the processing of your data.

Your personal data – what is it?

Personal data relates to a living individual who can be identified from that data. Identification can be by the information alone or in conjunction with any other information in the data controller’s possession or likely to come into such possession. The processing of personal data is governed by GDPR.

How do we process your personal data?

As the data controller we shall be responsible for, and be able to demonstrate compliance with our obligations under GDPR to ensure that your personal data is:

- Processed lawfully, fairly and in a transparent manner in relation to you.
- Collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes.
- Adequate, relevant, and limited to what is necessary in relation to the purposes for which they are processed.
- Accurate and, where necessary, kept up to date.
- Kept no longer than is necessary for the purposes for which the personal data is processed.
- Processed in a manner that ensures that appropriate security of all personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction, or damage, using appropriate technical or organisational measures.

What type of personal information do we collect?

We may collect and process the following personal information about you:

- Personal contact details, such as name, title, address, contact numbers and email address.
- Date of birth.
- Gender.
- Next of kin and emergency contact information.
- GP information.
- Allergies.
- Bank details.
- Copy of driving licence.
- CCTV footage.
- Photographs.

We may also collect and process the following sensitive types of personal information about you:

- Information about your race or ethnicity, religious beliefs, sexual orientation, and political opinions.
- Information about criminal convictions and offences.
- Information about your health, including any medical condition.

We collect personal information about you either directly from you or via a third party, such as through a school, and throughout your relationship with us.

How we will use your personal data

The situations in which we will process your personal information are listed below:

- To enable us to provide a voluntary service for the benefit of the public as specified in our constitution.
- To administer membership records.
- To fundraise and promote the interests of the organisation.
- To manage those on work placements and our volunteers.
- To maintain our own accounts and records.
- To operate the FARE Scotland website and deliver the services that individuals have requested.
- To inform individuals of news, events, activities, or services running at FARE Scotland.
- To process gift aid applications.
- To contact individuals via surveys to conduct research about their opinions of current services or of potential new services that may be offered.
- For the approval and achievement of qualifications.
- For the prevention of crime through the use of CCVT.

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.

What is the legal basis for processing your data?

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:

Consent

Consent is where we ask you if we can use your information in a certain way, and you agree to this, for example, when we send you marketing material via post, phone, text, or e-mail.

In circumstances where you have provided 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 info@FARE-Scotland.org. Once we have received notification that you have withdrawn your consent, we will no longer process your information for the purpose originally agreed to.

Legal obligation

We have a basis to use your personal information where we need to do so to comply with one of our legal or regulatory obligations. For example, in some cases we may need to share your information with our various regulators such as OSCR, fundraising regulators, the Information Commissioner, or to use information we collect about you for due diligence or ethical screening purposes.

Performance of a contract

We have a basis to use your personal information where we are entering into a contract with you or performing our obligations under that contract. Examples of this may include you applying to volunteer for us or being funded to undertake research.

Vital interests

We have a basis to use your personal information where it is necessary for us to protect life or health. For instance, if there were to be an emergency impacting individuals at one of our services, outings, clubs, or events, or there was a safeguarding issue which required us to contact people unexpectedly or share their information with emergency services.

Legitimate interests

We have a basis to use your personal information if it is reasonably necessary for us (or others) to do so and in our/their “legitimate interests” provided that what the information is used for is fair and does not unduly impact your rights.

We consider our legitimate interests to include all of the day-to-day activities FARE Scotland carries out with personal information. Some examples not mentioned under the other bases above where we are relying on legitimate interests are:

- Analysis and profiling of our supporters using personal information we already hold.
- Updating your address using third party sources if you have moved house.
- Use of personal information when we are monitoring use of our website or apps for technical purposes.
- Use of personal information to administer, review and keep an internal record of the people we work with, including supporters, volunteers, and researchers.

We only rely on legitimate interests where we consider any potential impact on you (both positive and negative), how intrusive it is from a privacy perspective, and that your rights under GDPR do not override our (or others’) interests in us using your information in this way.

Special categories of sensitive personal information require higher levels of protection. We need to have further justification for collecting, storing, and using this type of personal information. We may process special categories of personal information in the following circumstances:

- With your explicit written consent.
- Where we need to carry out our legal obligations or exercise rights in connection with employment.
- Where it is needed in the public interest, such as diversity monitoring or in relation to our occupational pension scheme.
- Where it is required in legal claims.
- Where it is needed to protect your interests, or someone else’s interests and you are not capable of giving your consent.
- Where the information has already been made public by you.

Sharing your personal data

Your personal data will be treated as strictly confidential and will only be shared within FARE Scotland. We will only share your data with third parties outside of the organisation with your consent.

We require third parties to respect the security of your data and to treat it in accordance with the law.

Data security

We have put in place security measures to prevent your personal information from being accidentally lost, used, or accessed in an unauthorised way, altered, or disclosed. In addition, 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.

How long do we keep your personal data?

We keep our personal data for no longer than reasonably necessary to have up to date and relevant information on all of our active service users, volunteers, and funders, for the purpose of any legal claims and/or complaints and for safeguarding purposes.

Below is a breakdown of how long we will keep each type of personal information we hold on you:

Type of Record	Format	Retention Period
Relevant information in relation to service users including consents for the processing of personal and sensitive data	Electronic and paper copies	Up to one year after processing ceases

Relevant information in relation to volunteers and work placements including consents for the processing of personal and sensitive data	Electronic and paper copies	Up to one year after processing ceases
Relevant information in relation to funders (non-accounting related information)	Electronic and paper copies	Up to one year after processing ceases
Accounting records	Electronic and paper copies	Up to six years after processing ceases
Any reportable accident, death, or injury in connection with work	Electronic and paper copies	Up to three years after the incident

Your rights and your personal data

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

Unless subject to an exemption under GDPR, with respect to your personal data, by law you have the right to:

- Request access to personal information. This enables you to receive access to the personal information we hold about you and to check that we are lawfully processing it.
- 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.
- 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.
- 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.
- Request the restriction of processing of your personal information. This enables you to ask us to suspend the processing of personal information about you.
- Request the transfer of your personal information to another party.
- Be informed about the collection and use of your personal data.

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.

We may need to request specific information from you to help us to confirm your identity and ensure your right to access the information. This is a security measure to ensure that personal information is not disclosed to any person who has no right to receive it.

Further processing



If we wish to use your personal data for a new purpose, not covered by this privacy notice, then we will provide you with a new notice explaining this new use prior to commencing the processing and setting out the relevant purposes and processing conditions.

Where and whenever necessary, we will seek your prior consent to the new processing.

Changes to this privacy notice

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.

Compliance

If you have any questions about this privacy notice or how we handle your personal information, please contact info@FARE-Scotland.org. 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.