



# CULBOKIE COMMUNITY TRUST

## Privacy Notice

### Who is Culbokie Community Trust?

Culbokie Community Trust (CCT) is a charity and limited company that exists for the benefit of everyone in the Culbokie area. Anyone on the electoral register is eligible to be a full voting member and we also have junior, business and associate membership categories.

Our objectives include:

- Managing community land and assets
- Providing recreation facilities and activities
- Community development
- Education about the environment, culture and heritage
- Environmental protection

### What personal information do we collect, how do we collect it and how do we use it?

We collect the following information.

Data list	Data held	How collected	How used
CCT Members	Name, address, phone number, e-mail	Membership forms	To keep member up to date with CCT activities, to ask for assistance, to manage membership subscriptions and for other CCT business
Volunteers and other Individuals who are not members	Name, address, phone number, e-mail	A range of verbal and e-mail requests received by CCT asking to be put on contact lists	To encourage engagement of volunteers, businesses and supporters in CCT's work and to promote the work of CCT.
Culbokie Community Market stallholders	Name, address, phone number, e-mail, business type	Direct personal approach from or to stallholder	To keep informed of market activities and to promote stalls
Culbokie Community Market promotion group	Name, e-mail	Unknown	To ask for assistance in promoting the market
Market Café groups	Name, phone number, e-mail	Group requests to participate	To promote vacant café slots to local groups and charities as fundraising opportunity

Culbokie Community Trust Limited. A company limited by guarantee. Registered in Scotland No: SC4810940

Registered Scottish Charity SC045867

Registered office: Frame Kennedy, Metropolitan House, 31-33 High St, Inverness. IV1 1HT

## Lawful basis for collecting information

There are six possible lawful bases for collecting information as follows. The two that are most relevant to CCT are:

1. Consent – the individual has given clear consent for us to process their personal data for a specific purpose.
2. Legitimate interests - the processing is necessary for our legitimate interests

The lawful basis for each of our data lists is as follows:

Data List	Lawful basis	Reason
CCT Members	Legitimate interest	Anyone who joins and continues to retain their membership of CCT would reasonably expect us to use their data to contact them with news of our activities
Volunteers and other individuals who are not members	Consent	This dataset is not backed up by implicit membership consent
Culbokie Community Market Stallholders	Legitimate interest	The Culbokie Community Market is part of CCT's charitable activities and depends on good communications with stallholders
Culbokie Community Market promotion group	Consent	This dataset has unknown origins and is used mainly for marketing purposes
Market Café groups	Legitimate interest	The Market Café is part of CCT's charitable activities and depends on good communications with groups and charities that are running it

## Who do we share personal information with?

We do not share personal information with anyone. In the future we may use an online service to deliver newsletters electronically. If we do this we will ensure that they are GDPR compliant.

## How long we retain personal information?

Membership - We retain personal information for as long as an individual remains a member. If someone ceases to be a member we will delete their personal information within 3 months.

Market Stallholders - We will retain market stallholder information for as long as a business plays an active role in the market. We will delete information within three months on request.

Consents, where required, will be renewed every 3 years

## Your rights

Anyone on our data lists has a right to ask for access to their personal information and to ask us to correct any inaccurate information or to delete their information if they believe we no longer need it or their consent has been withdrawn. We will deal with any such requests within 30 days.

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## **Security**

Information from membership forms and consent requests will be recorded electronically and any paper records will be shredded. Electronic data will be available only to Directors and key staff or volunteers who need the information to perform their role.

Any security issues will be minor because of the limited amount of information we hold. However if there is a breach in security, all those who have been affected will be informed immediately

## **Contact information and advice**

Any queries should be raised with the Chair Person of CCT or any of CCT's Directors.

## **Supervisory Authority**

Any complaints can be directed to the supervisory authority as follows:

Information Commissioner's Office  
Wycliffe House  
Water Lane  
Wilmslow  
Cheshire  
SK9 5AF

Tel: 0303 123 1113

<https://ico.org.uk/global/contact-us/>