

Edinburgh Social Enterprise (ESE) DATA PRIVACY NOTICE

Edinburgh Social Enterprise Network Ltd (referred to in this document as 'ESE')

This Privacy Policy was last updated on 24 May 2018. It is effective from 25 May 2018

This Privacy Policy outlines:

- what information we collect and when we collect it
- what we do with it and how we keep it secure
- what we use it for; and
- how you can control our use of it.

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 the General Data Protection Regulation 2016/679 (the "GDPR")

How do we process your personal data?

ESE is the data controller (contact details below). This means it decides how your personal data is processed and for what purposes.

- ESE complies with its obligations under the GDPR by keeping personal data up to date;
- by storing and destroying it securely; by not collecting or retaining excessive amounts of data;
- by protecting personal data from loss, misuse, unauthorised access and disclosure and by ensuring that appropriate technical measures are in place to protect personal data. We use your personal data for the following purposes:
 - o To enable us to provide a voluntary service for the benefit of the public as specified in our constitution;
 - o To administer membership records;
 - o To fundraise and promote the interests of the charity;
 - o To manage our employees and volunteers;
 - o To maintain our own accounts and records.

- o [Our processing also includes the use of CCTV systems for the prevention of crime].
- o To operate the ESE web site and deliver the services that individuals have requested.
- o To inform individuals of news, events, activities or services running at ESE.
- o To process gift aid applications.
- o To contact individuals via surveys to conduct research about their opinions of current services or of potential new services that may be offered.
- o To contact individuals via surveys to conduct research about their opinions of matters relevant to them, their organisations or the wider social enterprise sector.

What is ESE's legal basis for processing your personal data?

We operate under the General Data Protection Regulation (GDPR), a European Union regulation, effective from 25 May 2018. GDPR is designed to improve the data security and privacy of European citizens. In short, it is designed to ensure that your data is safe, and that you can access and control it. It gives you greater security, transparency, and control of your personal data online, something we are fully committed to.

We collect and process information about you only where we have legal bases for doing so under applicable EU laws. The legal bases depend on your engagement with us and how you use any of our products or services. This means we collect and use your information only where:

Who is collecting it?

Only ESE staff are authorised to collect information on ESE's behalf.

How is it collected?

Information may be collected in any or all of the following ways:

- By email
- By phone
- Via a website form (either a downloaded document or online form)

- Via a newsletter subscription form
- Face-to-face with an ESE employee, approved volunteer or authorise contractor
- Via cookies and code use on the website

What information is being collected?

If you give us consent, we may collect and store the following information whilst you use our website:

- Through cookies and other tracking technology, information about your computer and about your visits to and use of this website including your geographical location, browser type, how you found our website, the pages you viewed and the length of time you viewed them. We use web analytics to learn how our website is performing and to help us to continually improve the site's functionality. Any analytics data that is collected, processed and stored while you are on our website is aggregated, anonymous, secure and kept confidential.
- Information relating to any transactions carried out between you and us on or in relation to our website.
- When you use our website, we may request to use cookies. A cookie is a small file which asks permission to be stored on your computer and, once you agree, allows web applications to respond to you as an individual. A cookie in no way gives us access to your computer or any information about you, other than the data you choose to share with us. Most web browsers automatically accept cookies, but you can usually modify your browser to decline cookies if you prefer, although this may prevent you from taking full advantage of the website.

How will information be used?

We use information submitted in the following ways depending on what reason you provided information to us:

- To provide you with services and information
- To process registrations and invoices for training courses
- To provide organisational development and support services
- To respond to your requests from contact forms
- To publish noticeboards on the website
- To process your membership request and send you relevant information
- To enable us to review, develop and improve our website and services we offer

Security

We are committed to ensuring that your information is secure. To prevent unauthorised access or disclosure, we have put in place suitable physical, electronic and managerial procedures to safeguard and secure the information we collect. We also review our contracts with vendors and partners to make sure they are also compliant and can give us the guarantees on privacy and data protection that we require.

Links to other websites

Our website may contain links to other websites. If you use these links to leave our site, you should understand that we do not have any control over that other website. You should always exercise caution and review the privacy policy applicable to that other website.

Sharing your personal data

Your personal data will be treated as strictly confidential and will be shared only with relevant parties where required such as ESE staff members, authorised contractors, approved volunteers where necessary to provide you with a service or information.

We will only share your data with third parties outside of the organisation with your consent.

ESE will never sell your personal data to third parties.

How long do we keep your personal data?

We keep your personal data for no longer than reasonably necessary and we only retain your data for the following purposes and use the following criteria to determine how long to retain your personal data

- Training Course registrations – kept for 24 months
- Organisational Development Referrals (and related information and paperwork) – kept for 36 months
- Newsletter subscription information – kept as long as you continue to be a subscriber to ESE newsletter
- Membership – kept as long as you continue to be a member of the company plus 24 months
- Website tracking information – stored for 38 months

Your rights and your personal data

Unless subject to an exemption under the GDPR, you have the following rights with respect to your personal data: -

- The right to request a copy of your personal data which ESE holds about you;
- The right to request that ESE corrects any personal data if it is found to be inaccurate or out of date;
- The right to request your personal data is erased where it is no longer necessary for ESE to retain such data;
- The right to request that the data controller provide the data subject with his/her personal data and where possible, to transmit that data directly to another data controller, (known as the right to data portability), (where applicable)
- The right, where there is a dispute in relation to the accuracy or processing of your personal data, to request a restriction is placed on further processing;
- The right to object to the processing of personal data, (where applicable) [Only applies where processing is based on legitimate interests (or the performance of a task in the public interest/exercise of official authority); direct marketing and processing for the purposes of scientific/historical research and statistics]
- The right to lodge a complaint with the Information Commissioners Office. Contact details are;

<https://ico.org.uk/concerns>

Information Commissioner's Office
Wycliffe house
Water lane
Wilmslow
Cheshire
SK9 5AF

To exercise all relevant rights, queries or complaints please in the first instance, contact us at:

info@edinburghsocialenterprise.co.uk

or in writing to;

Edinburgh Social Enterprise

138-140 The Pleasance

Edinburgh

EH8 9RR

Telephone; 0131 241 1928

Further processing

If we wish to use your personal data for a new purpose, not covered by this Data Protection 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.