



Privacy Policy

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Who we are

Development Coll Limited (DC) is a company limited by guarantee with charitable status. It is the Isle of Coll's development trust and it owns and operates An Cridhe, Coll Bunkhouse and Coll's 4G mobile mast on behalf of the community of Coll. Coll is a community where privacy can, by virtue of the small population, be harder to come by so we appreciate the need to protect the personal data of individuals who communicate with us.

This policy outlines our commitment to you, and tells you: what data we collect; why we collect it; what we use it for, and; what rights you have. We are aiming for best practice, not just minimum compliance, when it comes to protecting your personal information.

Scope of this policy

All data subjects whose personal data is collected, in line with General Data Protection Regulations. A data subject is an identifiable natural person, that is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

Responsibilities

Development Coll, as controller and processor, is responsible for ensuring that this information is made available to data subjects at the time the data is collected.

Terminology

Every attempt is made to keep this policy jargon-free but further explanation of some of the terminology may give the reader greater clarity:

- Stakeholder – any person or organisation that has interaction with, and may share personal data with, Development Coll, from customer to supplier, bank to professional advisors, and employees to trustees.
- Personal data/information – means any information relating to an identifiable natural person ('data subject'); an identifiable natural person is one who can be identified directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person;
- Processing – means any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available alignment or combination, restriction, erasure or destruction;
- Controller – means the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data; where the purposes and means of such processing are determined by Union or Member State law, the controller or the specific criteria for its nomination may be provided for by Union or Member State law;
- Joint Controllers – where two or more controllers jointly determine the purposes and means of processing, they shall be joint controllers. Joint controllers will have an agreement in place that outlines their respective responsibilities for compliance with General Data Protection Regulations.

- Processor – means a natural or legal person, public authority, agency or other body which processes personal data on behalf of the controller.

Development Coll's Commitment

Development Coll's Privacy Policy is, by necessity, quite a lengthy document. This commitment outlines DC's ethos towards the privacy of its stakeholders personal information.

Collecting personal information

Development Coll does not actively seek to collect personal information unless the data subject requests a service and collection is a necessity of provision of the service. Whether it be a job application, a ticket purchase, becoming a trustee, or a request to join a mailing list, DC will seek only the information it needs to ensure that it can provide the professional service that its stakeholders deserve, and the necessary amount to comply with legislation. As a membership organisation where all residents on the Isle of Coll are eligible to be full members, there is one exception; Development Coll may periodically access the electoral register to ensure that all local residents are aware of their right to membership of this community organisation.

Privacy Notices

General Data Protection Regulations (GDPR) requires that DC provides the stakeholder with information at the time it collects their personal data, or; if someone else provides the data to DC to provide the stakeholder with information during DC's first communication with them and no later than one month. DC does this by way of a service-specific privacy notice that sets out:

- That DC is the data controller
- How to contact DC
- Purpose of the processing of the personal data and the legal basis for the processing
- The legitimate interests of the controller or third party, where applicable
- Categories of personal data, if required
- Any recipient or categories of recipients of the personal data
- Details of transfers to third parties, non-EU countries and safeguards
 - N.B. DC does not sell personal data
- Retention period or criteria used to determine the retention period
- The existence of each of the data subject's rights
- The right to withdraw consent at any time, where relevant
- The right to lodge a complaint with a supervisory authority
- The source the personal data originates from and whether it came from publicly accessible sources

Use of third party services

Like all businesses, DC uses specialist businesses for specific services (ticketing, mailing lists, etc.) and where the third party business is acting as a joint data controller (FreeToBook), new data protection regulations require a written contract between them and DC, giving the stakeholder an added layer of protection. Third parties who are processing information on behalf of DC also have to stipulate their commitments to DC as their customer. Where appropriate, the relevant Privacy Notice will let the stakeholder know which third-party services DC is using to give the stakeholder the information they need to decide if they wish to provide their personal information. Privacy Notices will provide information on how to find the Privacy Policy or Notice of the third party.

Storage & Retention

The personal information of DC's stakeholders is either kept under lock and key, or in e-files stored using cloud-based services with either GDPR-compliance or USA Privacy Shield Certificates. DC doesn't retain personal information any longer than is necessary in order to provide a service or, where required, the minimum term in legislation.

Email

Some of DC's services operate more efficiently if it can collect an email address (e.g. online booking, ticketing, mailing). If a stakeholder is unhappy to provide an email address they can still (with some exceptions) access DC's services in full, but may have to phone DC instead. DC will not market by email unless the stakeholder has actively consented.

Giving the stakeholder control

And, finally, DC wants its stakeholders to know that - except where the law requires otherwise - they have control over how DC uses their information and how long it is kept, and in many cases they have the right to request that it is deleted. On rare occasions, deletion may affect service provision, (e.g. no longer able to receive an e-bulletin, or continue with the 500 Club), and DC will advise the stakeholder of this, where possible. DC provides many different services, too many to detail in one privacy notice, without losing transparency for the stakeholder. When the stakeholder requests a specific service from DC, DC will give them more detail about how that particular service impacts on the privacy of their personal information.

What information we collect

Personal data the stakeholder provides

Personal data is information which identifies a person, or which can be identified as relating to them personally.

Development Coll Limited (DC) collects data stakeholders provide them with. This includes information a stakeholder gives when joining or registering, becoming a staff member or a volunteer, and placing an order or communicating with Dc. For example:

- Personal details (name, email, date of birth, address, telephone number, other legislative requirements, details of emergency contacts)
- Financial information (payment information such as credit/debit card). Please see 'Payment Security' for more information.
- WiFi – at two of DC's premises, stakeholders can access a public wifi facility. Anonymised data may be collected about: their device; the volume of data they use; the websites and applications they access; and, their usage by access time, frequency and location. Such information is only used to provide them with access to DC's public WiFi and is not used for profiling, marketing or other purposes. If they do not want DC's WiFi to use their location data, they change the settings on their device. Disabling such access may result in loss of certain functionality accordingly.

Information from Third Parties

PayPal - From time to time DC provides accounting functions for local organisations who may receive payment to DC's PayPal account. This may give DC access to personal data as it is stored within PayPal for the purposes of them making a payment. This privacy notice applies in terms of how DC processes the personal information it has access to. PayPal's privacy policy is [here](#)

Information created by involvement with Development Coll

A stakeholder's activities and involvement with Development Coll may result in personal data being created. This could include details of how they have helped by volunteering or being involved with our campaigns and activities.

If a stakeholder decides to donate to DC, DC may keep records of when and how much was given to a particular cause.

Information from third parties

DC may receive personal data about individuals from third parties. For example, if partnering with another organisation (e.g. provision of information to another organisation that DC is collaborating with on a project). DC may collect information from social media where permission has been given by the stakeholder, or if they post on one of DC's social media pages.

Sensitive personal data

DC does not normally collect or store sensitive personal data (such as information relating to health or beliefs) about stakeholders. However, there are some exceptional situations where this could occur (e.g. if you volunteer with us or have an accident on one of our premises). If this does occur, DC will take extra care to ensure the stakeholder's privacy rights are protected.

Accidents or incidents

If an accident or incident occurs on DC's property, at one of its events or involving one of its staff (including volunteers) then DC will keep a record of this (which may include personal data and sensitive personal data).

Employees and Volunteers

DC may have to collect extra information about references, criminal records checks, details of emergency contacts, medical conditions etc.). This information will be retained for legal reasons, to protect DC (including in the event of an insurance or legal claim) and for safeguarding purposes.

Processing of information

Types of information processed

- Personal details
- Family detail
- Lifestyle and social circumstances
- Membership details
- Goods and services
- Financial details
- Education and employment details

We also process sensitive classes of information (in exceptional circumstances) that may include

- Health
- Religious belief

Whose personal information DC processes

- Members
- Customers, clients
- Suppliers
- Staff, volunteers

- Trustees
- Complainants, supporters
- Enquirers
- Consultants, professional advisers and representatives of other organisations
- Sponsors

Legal basis for using information

DC only ever uses personal data with the stakeholder's express consent, or where necessary in order to:

- Provide the stakeholder with services they have voluntarily and actively consented to (after being provided with the relevant privacy notice; or, in response to a communication the stakeholder has initiated, whereby the privacy notice will be communicated at the earliest opportunity)
- Enter into, or perform, a contract;
- Comply with a legal duty;
- Protect the stakeholder's vital interests (exceptional circumstances only)
- For DC's own (or a third party's) legitimate interests, providing the stakeholder's rights don't override these.;

Marketing

DC uses personal data to communicate with people, to promote the work and services of Development Coll and to help with fundraising. An Cridhe and Coll Bunkhouse maintain mailing lists that stakeholders can voluntarily opt in to. This form of email communication is only used for the purposes they have actively consented to, and they can withdraw consent at any time. Development Coll may, on occasion, use personal data to mail members, associates and residents by post. Email communication will only be used if they have actively consented, and only for the purpose to which they consented.

Administration

DC uses personal data for administrative purposes (i.e. to carry on our charity work and provide our services). This includes:

- Maintaining databases of volunteers, members and supporters;
- Performing obligations to members;
- Fulfilling orders for goods or services (whether placed online, over the phone or in person);
- Helping DC respect the stakeholder's choice (e.g. if a member declines marketing material DC will keep a record of this).

Internal Analysis

When Coll Bunkhouse customers choose to provide additional information (e.g. how they heard about Coll Bunkhouse, their age group) DC uses that data to better understand who the customers are and to ensure any marketing we embark on is good value for money. The data input for analysis (in Excel) does not include personal information that would enable the customer to be identified.

Disclosing and sharing data

DC will never sell personal data.

Occasionally, where DC partners with other organisations, it may also share information with them (e.g., if a stakeholder registers to attend an event being jointly organised). DC will only share information when necessary and will make sure to notify the stakeholder first.

How DC protects data

DC employs a variety of physical and technical measures to keep personal data safe and prevent unauthorised access to, or use or disclosure of a stakeholder's personal information. DC may use third party services, such as payroll services. These activities will be carried out under a contract which imposes strict requirements on the supplier to keep DC's stakeholder information confidential and secure.

Payment security

DC uses a merchant terminal to process card payments, for both absent and present customers. DC complies with the Payment Card Industry Data Security Standard (PCI-DSS) published by the PCI Security Standards Council and will never store card details.

DC cannot guarantee the security of a stakeholder's computer or the internet and any online communications (e.g. information provided by email or our website) are at the user's own risk. Where possible, the stakeholder will be advised of this prior to the communication.

Storage

Where we store information

DC's operations are based in the UK and DC stores data within the European Union. Some organisations which provide services to DC may transfer personal data outside of the EEA, but DC only allows them to do so if the data is adequately protected.

For example, some of DC's systems use Microsoft products. As a U.S. company, it may be that using their products result in personal data being transferred to or accessible from the U.S. However, DC will allow this as it is certain personal data will still be adequately protected (as Microsoft is certified under the U.S.A.'s Privacy Shield scheme).

Where practicable, your personal information is stored in paper form under lock and key within DC's registered office. Only staff have access to this room, and only the necessary staff have access to these files.

Some personal information may be stored using e-files and cloud-based services are used to store these encrypted files. These cloud-based services use several layers of security measures, including encryption, to ensure DC's data is secure. Some of the well-established internet-based services DC uses are: [Box](#) (cloud storage), [MailChimp](#) (e-mailing service), [Free to Book](#), [TicketSource](#), [Sage Drive](#). To find out more, please follow the links to their privacy policies. Development Coll has agreements in place with third parties who process data on its behalf. In most cases, this data is encrypted and while that does not ensure a stakeholder cannot be identified, the low risk is out-weighted by the benefits of using the facilities these companies provide. All companies operate to GDPR or U.S.A. Privacy Shield standard.

Access to DC's accounts with third parties is via 'strong' password and passwords are not shared. Best practice is adopted for account access within the trustee and employee structure.

How long we store information

DC stores information for the shorter of: the period we are required by legislation to store the information, or; for so long as it is required for the purposes it was collected for. How long

information will be stored depends on the information in questions and what it is being used for and full information will be provided on the Privacy Notice for the relevant service.

Keeping the stakeholder in control

DC wants to ensure the stakeholder remains in control of their personal data. Part of this is making sure they understand their legal rights, which are as follows:

- The right to confirmation as to whether or not DC has their personal data and, if it do, to obtain a copy of the personal information DC holds (this is known as subject access request);
- The right to have their data erased (though this will not apply where it is necessary for DC to continue to use or store the data for a lawful reason, e.g. retention of sales invoice for VAT purposes);
- The right to have inaccurate data rectified;
- The right to object to their data being used for marketing or profiling; and
- Where technically feasible, they have the right to the personal data they have provided to DC which DC processes automatically on the basis of their consent or the performance of a contract. This information will be provided in a common electronic form.

Please keep in mind that there are exceptions to the rights above and, though DC will always try to respond to their satisfaction, there may be situations where DC is unable to do so.

If a stakeholder would like further information on their rights or wish to exercise them, they can write to DC's Manager at An Cridhe, Arinagour, Isle of Coll PA78 6SY or email: jane@developmentcoll.org.uk

DC can provide them with a template subject access form which includes guidance on how to make their request (and will help DC respond more quickly).

Complaints

Complaints to Development Coll can be made directly by contacting the Manager using the details set out above.

If the stakeholder is not happy with DC's response, or believes that their data protection or privacy rights have been infringed, they can complain to the UK Information Commissioner's Office which regulates and enforces data protection law in the UK. Details of how to do this can be found at www.ico.org.uk

Changes to this Privacy Policy (further processing)

DC will amend this privacy policy from time to time to ensure it remains up-to-date and accurately reflects how and why DC uses personal data. The current version of DC's privacy policy will always be posted on DC's website. The more detailed and service specific privacy information will also be updated and will be provided when the stakeholders requests a service or makes the first communication with DC (that would result in the collection of personal data).