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## SFF PRIVACY NOTICE

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### **BACKGROUND:**

The Scottish Flood Forum understands that your privacy is important to you and that you care about how your personal data is used. We respect and value your privacy and will only collect and use personal data in ways that are described here, and in a way that is consistent with our obligations and your rights under the law.

#### **1. Information About Us**

The Scottish Flood Forum.

Scottish Charitable Incorporated Organisation No. SC043783

**Principal office:** Caledonian Exchange,  
19A Canning Street,  
Edinburgh,  
EH3 8HE

**Main Point of Contact:** Kirsty MacRae.

**Email address:** [enquiries@scottishfloodforum.org](mailto:enquiries@scottishfloodforum.org)

**Telephone number:** 07771 513990

We are regulated by the Office of the Scottish Charity Regulator (OSCR)

#### **2. What Does This Notice Cover?**

This Privacy Information explains how we use your personal data: how it is collected, how it is held, and how it is processed. It also explains your rights under the law relating to your personal data.

#### **3. What is Personal Data?**

Personal data is defined by the General Data Protection Regulation (EU Regulation 2016/679) (the "GDPR") as *'any information relating to an identifiable person who can be directly or indirectly identified in particular by reference to an identifier'*.

Personal data is, in simpler terms, any information about you that enables you to be identified. Personal data covers obvious information such as your name and contact details, but it also covers less obvious information such as identification numbers, electronic location data, and other online identifiers.

The personal data that we use is set out in Part 5, below.

#### **4. What Are My Rights?**

Under the GDPR, you have the following rights, which we will always work to uphold:



- a) The right to be informed about our collection and use of your personal data. This Privacy Notice should tell you everything you need to know, but you can always contact us to find out more or to ask any questions using the details in Part 11.
- b) The right to access the personal data we hold about you. Part 10 will tell you how to do this.
- c) The right to have your personal data corrected if any of your personal data held by us is inaccurate or incomplete. Please contact us using the details in Part 11 to find out more.
- d) The right to be forgotten, i.e. the right to ask us to delete or otherwise dispose of any of your personal data that we have. Please contact us using the details in Part 11 to find out more.
- e) The right to restrict (i.e. prevent) the processing of your personal data.
- f) The right to object to our use of your personal data for a particular purpose or purposes.
- g) The right to data portability. This means that, if you have provided personal data to us directly, we are using it with your consent or for the performance of a contract, and that you can ask us for a copy of that personal data to re-use with another service or business in many cases.
- h) Rights relating to automated decision-making and profiling. We do not use your personal data in this.

For more information about our use of your personal data or exercising your rights as outlined above, please contact us using the details provided in Part 11.

Further information about your rights can also be obtained from the Information Commissioner's Office or your local Citizens Advice Bureau.

If you have any cause for complaint about our use of your personal data, you have the right to lodge a complaint with the Information Commissioner's Office.

## 5. **What Personal Data Does the SFF Collect?**

We may collect some or all of the following personal data (this may vary according to your relationship with us)

- your name;
- your email address
- your phone number;
- your address,
- your job title;
- recordings of calls you make to our contact centre;
- any other information you provide to help us answer your query.

Your personal data may be obtained from the following third party:

- SEPA Contact Centre who manage our 01698 839021 enquiry line and who collect name, email and/or phone number and nature of the enquiry along with



any other information you provide.

## 6. **How Does the SFF Use My Personal Data?**

Under the GDPR, we must always have a lawful basis for using personal data. This may be because the data is necessary for our performance of a contract with you, because you have consented to our use of your personal data, or because it is in our legitimate business interests to use it. Your personal data may be used for one of the following purposes:

- To understand and respond to your enquiry to us and to supply our products or services to you.
- Communicating with you. This may include responding to emails or calls from you.
- Supplying you with information by email (including via MailChimp) that you have consented to. You may unsubscribe or opt-out at any time by following the instructions in the relevant communication;
- to comply with applicable law and regulation;
- with your express consent to respond to any comments or complaints we may receive from you, and/or in accordance with our legitimate interests including to investigate any complaints received from you or from others, about our website or our products or services;
- to protect the SFF's legitimate business interests and legal rights, including but not limited to, use in connection with legal claims, compliance, regulatory and investigative purposes (including disclosure of such information in connection with legal process or litigation);

With your express permission and/or where permitted by law, we may also use your personal data for marketing purposes, which may include contacting you by email with information, news, and offers on our services. You will not be sent any unlawful marketing or spam. We will always work to fully protect your rights and comply with our obligations under the GDPR and the Privacy and Electronic Communications (EC Directive) Regulations 2003, and you will always have the opportunity to opt-out.

## 7. **How Long will the SFF Keep My Personal Data?**

We will not keep your personal data for any longer than is necessary in light of the reason(s) for which it was first collected. . Your personal data will therefore be kept for the following periods (or, where there is no fixed period, the following factors will be used to determine how long it is kept):

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- Where you have consented and subscribed to receive our newsletter and be contacted by us, your data will be kept until you unsubscribe, which you may do at any time.
- As homes and communities in flood risk areas may experience repeat flood events, where you have contacted the SFF regarding a flood related issue,



your data will be kept to allow us to help you more easily in the event of a re-occurrence of flooding unless we are aware that flood risk is no longer an issue, you inform us that you have moved house or the data would no longer be considered up-to date or relevant.

- We refresh our contact database of community groups every two years and will delete contact details from non-responsive groups after a further two years. A group may request their data to be deleted at any time.
- Where we enter into a specific contract with you, the length of time that data will be kept will be discussed and agreed based on any financial or grant conditions and need for post-contract follow-up.

## 8. **Where Do You Store or Transfer My Personal Data?**

The personal data that we collect from you may be transferred to, and stored outside the European Economic Area (“EEA”) – in particular [MailChimp](#) for newsletter subscriptions.

Please contact us using the details below in Part 11 for further information about the particular data protection mechanism used by us when transferring your personal data to a third country

## 9. **Does the SFF Share My Personal Data?.**

We may share your personal data with the below third parties:

- our professional advisors such as our auditors and external legal and financial advisors;
- our contact centre, who act as our data processor to the calls;
- our sub-contractors who have agreed to process your personal data in line with this Privacy Notice;
- our website host, search engines and web analytics; and/or

9.1 MailChimp for newsletter subscription emails.

9.2 If any of your personal data is required by a third party, as described above, we will take steps to ensure that your personal data is handled safely, securely, and in accordance with your rights, our obligations, and the third party’s obligations under the law, as described above in Part 8.

9.3 If any personal data is transferred outside of the EEA (such as is the case with Mailchimp), we will take suitable steps in order to ensure that your personal data is treated just as safely and securely as it would be within the UK and under the GDPR, as explained above in Part 8.

In some limited circumstances, we may be legally required to share certain personal data, which might include yours, if we are involved in legal proceedings or complying with legal obligations, a court order, or the instructions of a government authority.



## 10. **How Can I Access My Personal Data?**

If you want to know what personal data we have about you, you can ask us for details of that personal data and for a copy of it (where any such personal data is held). This is known as a “*subject access request*”.

All subject access requests should be made in writing and sent to the email or postal addresses shown in Part 11.

There is not normally any charge for a subject access request. If your request is ‘*manifestly unfounded or excessive*’ (for example, if you make repetitive requests) a fee may be charged to cover our administrative costs in responding.

We will respond to your subject access request, within one month of receiving it. Normally, we aim to provide a complete response, including a copy of your personal data within that time. In some cases, however, particularly if your request is more complex, more time may be required up to a maximum of three months from the date we receive your request. You will be kept fully informed of our progress.

## 11. **How Do I Contact You?**

To contact us about anything to do with your personal data and data protection, including to make a subject access request, please use the following contact details marked *for the attention of Kirsty MacRae*.

**Email address:** [enquiries@scottishfloodforum.org](mailto:enquiries@scottishfloodforum.org)

**Telephone number:** 07771 513990.

**Postal Address:** Caledonian Exchange,  
19A Canning Street,  
Edinburgh,

## 12. **Changes to this Privacy Notice**

We may change this Privacy Notice from time to time. This may be necessary, for example, if the law changes, or if we change our business in a way that affects personal data protection.

Any changes will be made available on our website.

**Scottish Flood Forum  
May 2018**