



The Royal Society *for*  
*the* Support *of*  
Women *of* Scotland

## Privacy Statement

### Purpose of this Statement

This privacy statement describes how The Royal Society for the Support of Women of Scotland ("RSSWS", "The Society", "we", "us" or "our") collects and uses Personal Data, in accordance with the General Data Protection Regulation (GDPR), the Data Protection Act 2018 and any other applicable data protection law. Personal Data means any information relating to an identified or identifiable living person (known as a Data Subject) and this Statement applies to all Personal Data provided to us whether by the Data Subject themselves or by others.

### About us

The Society has provided assistance to women experiencing financial difficulties since 1847. Our qualifying criteria have evolved over the years, but a constant requirement has been that Applicants and Beneficiaries provide us with information about themselves to demonstrate that they meet these criteria. As a result, the Society's work has always involved the collection, assessment and storage of personal information and we have a proud history of gathering this information in a careful and sensitive manner and storing and analysing it in a fair, secure and confidential manner.

**The Society recognises the very sensitive nature of much of the information we hold. We are fully committed to the highest standards in the processing of all personal information to ensure that anyone connected with the Society has full confidence in our stewardship of their personal data.**

### Our role and reasons for processing Personal Data

The Society acts as a controller of Personal Data and is registered with the Information Commissioner's Office (ICO) to do so (Registration No. **Z1255385**). We collect, store and process Personal Data to:

- Establish entitlement and provide financial and other support to people in need of the Society's assistance;
- Facilitate the running of the Society, good governance and the employment of staff;
- Keep people up to date with the work of the Society including information about any fundraising we may be undertaking.

### Types of people we hold Personal Data about and the kinds of information held

The Society has identified several categories of people about whom we hold Personal Data. These are listed below along with a summary of the types of information held and our reasons for doing so:

1. **Enquirers** – names, contact details and brief summary of circumstances - to enable us to respond to enquiries and facilitate applications to the Society for support;
2. **Applicants** - as for (1) above, plus information they provided on our application form (which may include name and contact details for an emergency contact), supporting information provided, Caseworker assessment visit reports, bank details, etc – to enable us to assess their application for support and make payments if successful;
3. **Beneficiaries** - as for (2) above, plus cumulative information from follow up Caseworker contacts, details of payments made and support provided, etc. – to enable us to provide ongoing support, to report on our work and to keep them up to date with our work;
4. **Donors and other benefactors** – names, contact details and some financial information where relevant – to enable us to process their donations, legacies or other forms of support and to keep them up to date with our work;

5. **Staff** – names, contact details, employment history, employment details including next of kin and health issues, bank details, details of payments made, etc. – to enable us to employ them;
6. **Trustees** – names, contact details, date of birth, NI Numbers and details of outside interest interests– to facilitate good governance, keep them up to date with our work and to meet our legal obligations;
7. **Suppliers** – names and contact details of individuals supplying goods and services to the Society – to facilitate support from them, any relevant contracts and to keep them up to date with our work;
8. **People who choose to be on our mailing lists** – this will include former Beneficiaries, Trustees and Staff and we will retain their names and contact details to enable us to keep them up to date with our work which may include fund raising.

Data held about former Beneficiaries, Trustees, Staff and Donors is progressively reduced in line with our Data Retention Policy (although the Society retains a historic archive of records dating from the 1800s to 1980).

## **Special Category data**

Under GDPR some types of Personal Data are treated as Special Category data as it is seen as particularly sensitive. This includes data which relates to people's health, and we process this kind of data for most Applicants and Beneficiaries as it is relevant to decisions about whom the Society will support. Where we do so, the Society processes this information as a not-for-profit organisation. We may also hold data about Staff members' health and in these cases we process this data as part of their contract of employment.

Data relating to a person's ethnicity is also Special Category data. We may hold this relating to anyone connected to the Society in order to monitor our work to prevent discrimination and promote equalities.

## **Collection and accuracy of Personal Data**

We will only collect such Personal Data as is necessary for the Society to perform and promote its services and undertake its operations and will do all we can to keep any Personal Data accurate and up to date. To facilitate this we ask all Data Subjects to keep the Society up to date with any changes in their details.

With respect to Enquiries, Applicants and Beneficiaries, we will only collect and hold information provided initially and over time by the individual themselves, by those acting on their behalf and from documents provided by the individual or their representative. The Society does not gather information about applicants or beneficiaries from other sources.

With respect to Staff, Trustees, Suppliers and Donors, appropriate information is collected on first contact and developed through the duration of the relationship (including references or testimonials from others).

The Society's website collects name and contact details for Enquirer who use website the contact form. The website also uses cookies to collect data on what visitors to the website are looking at and what information they find most useful, and we use this data to improve and develop the website.

## **Use of Personal Data**

Under GDPR the Society must have a legal basis for processing Personal Data and in some cases we may do so using more than one lawful basis, depending on the type of information held and purpose for which we are using it. Our legal bases for processing Personal Data include:

### ***Legitimate interests***

The consideration of applications for support by Enquirers and Applicants, and the provision of ongoing assistance to Beneficiaries, requires the Society to process their Personal Data and we do so on the basis of our legitimate interests.

We also process other forms of Personal Data to enable the effective and lawful operation of the Society (provided that those interests do not override the interests, rights and freedoms of a Data Subject) and again we do so on the basis of legitimate interests. Examples of this include: assessing applications for Staff or Trustee positions; communicating with Trustee to ensure governance; contacts with Donors; and keeping people currently connected with the Society up to date with our work.

### ***Compliance with a legal obligation***

Some aspects of Personal Data are processed as part of our duty to comply with legal obligations. Examples include: the retention of financial records for 6 years as required by law (and included in this are the records of

our payments to Beneficiaries); administration of Staff payroll; compliance with audit requirements; and making referrals to protective services where we are concerned that a vulnerable adult may be at risk.

### ***Performance of a contract***

We also collect, hold and processes Personal Data concerning Staff in order to fulfil our contracts of employment with them, and we may do the same for Suppliers in relation to our contracts for goods or services with them.

### ***Consent***

Lastly, in a few very limited circumstances, the Society processes Personal Data on the basis of consent. We recognise that where consent is the only basis upon which Personal Data is processed, the relevant Data Subject shall always have the right to withdraw their consent. Accordingly, it is our policy to only do so in the following specific situations:

- Where people choose to remain on our mailing lists so we can keep them up to date with the Society's work which may include fundraising. We will ask if someone wishes to remain on our mailing list, only retain them on the list if they agree and always remove them from the list if they wish;
- When an Applicant or Beneficiary asks the Society to make a referral to another charity or support organisation on her behalf. We will obtain the Applicant or Beneficiary's verbal consent on each and every occasion prior to a referral being made.

### **Data retention**

We only retain the Personal Data processed by us for as long as is considered necessary for the purpose for which it was collected (including as required by applicable law or regulation).

The Society has a detailed Data Retention Policy which determines the timescale and extent by which Personal Data is deleted depending on the category of individual described above. We continually review this Data Retention Policy and we reserve the right to amend retention periods without notice. Copies of this policy are available on request and via our website at [www.rssws.org](http://www.rssws.org).

Additionally, as noted above, the Society retains a valuable historic archive that holds information about of former Beneficiaries (and former Trustees and Staff). This includes records from as far back as 1847 to 1980, but does not include records relating to anyone with a current connection to the Society.

### **Data security**

We take ensuring the security of all the data we hold very seriously both so that we meet our legal obligations under GDPR and to protect confidence in the Society. To this end:

- We have a framework of policies, procedures and training in place covering data protection, confidentiality and security and regularly review the appropriateness of the measures we have in place to keep the data we hold secure.
- We have appropriate security measures to prevent Personal Data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed.
- We limit access to Personal Data to those employees, agents, contractors and other third parties who have a business need to know, and our IT systems operate on a 'least privileged' basis by default.
- We have put in place procedures to deal with any suspected data security breach and will notify any affected Data Subject and any applicable regulator of a suspected breach where we are legally required to do so.

### **Sharing of Personal Data**

**The Society will NEVER sell Personal Data and does NOT share Personal Data with other people or organisations other than in very limited circumstances which are:**

- **We have the data subject's consent to do so** (for example, if a beneficiary asks us to contact a support organisation on their behalf);
- **We are required to do so by law** (for example to HMRC in the processing of payroll, or to protective services where we have significant concerns about a person's wellbeing or safety);
- **Where we have another clear and compelling legitimate interest to do so.**

## Use of third-party organisations and data remaining within the UK or EU

The Society relies on third-party organisations to enable us to operate and provide our support, and these third parties may have access to aspects of the Personal Data we hold. Examples include (but are not limited to):

- Beacom CRM for the provision of database and client record management services;
- Microsoft for the provision of email, calendar, data storage, word processing and other software tools;
- Bank of Scotland and Bottomline Technologies for the provision of banking and payment services;
- J7 (MIS) Ltd for the provision of IT support (and maintenance of our old database for a limited period);
- Wylie and Bisset for audit services;
- Xero and Egia Bookkeeping for bookkeeping services;
- Anderson Strathern LLP for legal services.

The Society reserves the right to change the third-party organisations we use for our work without notice, but in all cases, we only permit such third-parties to access Personal Data for specified purposes and in accordance with our instructions. All of our third-party providers are also required to take commercially reasonable and appropriate security measures to protect Personal Data and to ensure that all data remains within data centres inside the UK or EU. The Society does not actively transfer Personal Data outside of the UK or EU.

## Data Subject's rights in connection with Personal Data

Data Subjects have the following rights under Data Protection law in relation to the Personal Data the Society holds about them:

- Right of access - You have the right to ask us for copies of your personal information.
- Right to rectification - You have the right to ask us to rectify information you think is inaccurate. You also have the right to ask us to complete information you think is incomplete.
- Right to erasure - You have the right to ask us to erase your personal information in certain circumstances.
- Right to restriction of processing - You have the right to ask us to restrict the processing of your information in certain circumstances.
- Right to object to processing - You have the right to object to the processing of your personal data in certain circumstances.
- Right to data portability - You have the right to ask that we transfer the information you gave us to another organisation, or to you, in certain circumstances.
- Right to withdraw consent - You can withdraw your consent but only in relation to the very limited circumstances where we process Personal Data on the basis of consent.

The Society needs to be clear that if an Applicant or a Beneficiary asks the Society to erase, transfer or limit our use of their Personal Data, we are unlikely to be able to assess their application for assistance nor to provide them with financial or any other forms of support.

## Changes to this notice

We recognise the processing of Personal Data is an ongoing responsibility so we will keep this Privacy Statement under regular review. We reserve the right to do so without notice and will publish updated versions of this Statement on our website at [www.rssws.org](http://www.rssws.org).

## Contact details to update personal information, to exercise a right or to complain

To notify a change in your personal details, please email us at [info@rssws.org](mailto:info@rssws.org), call us on **0131 229 2308** or write to us at the address below.

If you have questions regarding this Statement, to exercise any right as a Data Subject, or to make a complaint, please email our Chief Executive at [ceo@rssws.org](mailto:ceo@rssws.org) or write to him/her at **The Chief Executive, RSSWS, 14 Rutland Square, Edinburgh EH1 2BD.**

If you remain dissatisfied with the way we have handled your concerns, you may have the right to make a complaint to the ICO. For further information please refer their website at [www.ico.org.uk](http://www.ico.org.uk).