

The Gloag Foundation – Privacy Notice

Welcome to The Gloag Foundation’s privacy notice.

The Gloag Foundation is committed to respecting your privacy and protecting your personal data. This privacy notice informs you about the data processing practices carried out by the Gloag Foundation and also tells you about your privacy rights and how the law protects you.

If you have any requests concerning your personal information or any queries with regard to our practices, please contact Mairi Graham, The Gloag Foundation, Robertson House, 1 Whitefriars Crescent, Perth, PH2 0PA or at dataprotection@gloagfoundation.com or call us on +44 (0)1738 633 264.

Purpose of this Privacy Notice

This privacy notice aims to give you information on how the Gloag Foundation, collects and processes your personal data, including any data you may provide to us from time to time.

It is important that you read this privacy notice together with any other privacy notice or fair processing notice we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This privacy notice supplements the other notices and is not intended to override them.

Contents

1. Who we are and the information that we collect
2. Use of personal information
3. Other websites
4. Your information
 - 4.1 Collecting your information
 - 4.2 How we use your data
 - 4.3 Keeping your data safe
 - 4.4 Keeping your information up to date
 - 4.5 Sharing information
 - 4.6 Your data rights & right of erasure
 - 4.7 Legitimate business use
5. Communications and supporter profiles
6. Use of cookies
7. Data Retention
8. Amendments

1. Who we are and the Information we collect

We are:

- The **Gloag Foundation**, a charitable trust set up in Scotland by Ann Gloag OBE with registered charity number SC035799

The Gloag Foundation's registered offices is at Robertson House, 1 Whitefriars Crescent, Perth, PH2 0PA ("we", "our" and "us"). We are data controller of any personal data that you provide us.

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We collect information from you when you enquire about our fundraising activities, make a donation, make an enquiry through any of our websites or if you otherwise provide us with personal information, for example, in person, over the phone, online, on paper or by SMS. This includes any interactions you may have with staff members the Gloag Foundation, consultants or contractors legally working on behalf of us, and any of our trustees'.

We may collect, use, store and transfer the following kinds of personal data about you:

- **Identity Data:** includes first name, maiden name, last name, or similar identifier, marital status, title, date of birth and gender.
- **Contact Data:** includes company name, address, email address and telephone numbers.
- **Financial Data:** includes bank account.
- **Technical Data:** includes internet protocol (IP) address, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access our website.
- **Usage Data:** includes information about how you use our website (in particular the pages users visit most often) and interact with us.
- **Marketing and Communications Data:** includes your preferences in receiving marketing from us and your communication preferences.

We do not collect any Special Categories of Personal Data about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data). Nor do we collect any information about criminal convictions and offences.

In addition to the above, we collect information automatically about your visit to our website. Please see our Cookies section for more details. We gather general information about the use of our website, in particular, the pages users visit most often. We may also track popular links on emails originating from us. We may use this information to personalise the way our website is used to

improve the service we provide to users. Wherever possible, we use aggregated or anonymous information which does not identify individuals.

2. Use of personal Information

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- Where we need to perform the contract we are about to enter into or have entered into with you;
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests; and
- Where we need to comply with a legal or regulatory obligation.

We usually do not rely on consent as a legal basis for processing your personal data other than in relation to sending direct marketing communications to you via email or text message. You have the right to withdraw consent to marketing at any time by contacting us.

We may send you information about the foundation's work according to the preferences you agreed. If you would like to update your preferences at any point, please email us at dataprotection@gloagfoundation.com or call us on +44 (0) 1738 633 264.

Alternatively, you can also write to us at The Gloag Foundation, Robertson House, 1 Whitefriars Crescent, Perth, PH2 0PA.

3. Other websites

Our website (www.gloagfoundation.org.uk) may link to other websites that are outside our control and are not covered by this Privacy Policy. If you access other sites using the links provided, the operators of these sites may collect information from you that will be used by them in accordance with their privacy policy, which may differ from ours. Please check their terms and conditions.

4. Your information

4.1 Collecting your information

We collect your information in the following ways:

- **When you provide it to us DIRECTLY**
You may give us your information in order to make a donation either monetary or otherwise, communicate with us generally, participate in an event for or with our charity, or opt in to receiving communications from us via our website or through an email.
- **When you provide it to us INDIRECTLY**
Your information may be shared with us by fundraising sites like Just Giving or Virgin Money Giving if you choose to participate in an event in aid of the charity. These

independent third parties will have provided us with this information when you have indicated that you consent and wish to support us. You can check their Privacy Policy when you provide your information and to fully understand how they will process your data.

When you give permission to OTHER ORGANISATIONS to share your information or if your information is available publicly

We combine information you provide to us with information available from external sources. This is known as data/tele appending and it may assist us to contact you in the event that we have been unable to contact you or if we believe some of the original information to us is incorrect.

The information we get from other organisations may depend on your privacy settings or the responses you have provided to them. The three sources of information utilised are as follows:

Third party organisations

You may have provided permission for a company or other organisation to share your data with third parties, including charities. This could be when you buy a product or service, register for an online competition or sign up with a comparison site. These sites operate their own privacy policies and data handling procedures and we cannot be held responsible for data handling during your time visiting their site.

Information available publicly

This may include information found in places such as Companies House, the electoral roll and information that has been published in articles/newspapers.

- When we collect it as you use our WEBSITE

Like most websites, we use “cookies” to help us make our site – and the way you use it, better. Cookies mean that a website will remember you. They’re small text files that sites transfer to your computer (or phone/tablet). They make it easier and faster to interact with our website by (for example) filing in your name and address in the text fields.

In addition, the type of device you’re using to access our websites and the settings on that device may provide us automatically with information about your device, including what type of device it is and what operating system you’re using. Your device manufacturer or operating system can provide you with the details of what information they provide us with.

This is explained in more detail in section 6 below.

4.2 How we use your data

The type and quantity of information we collect and how we use it depends on why you are providing it.

Supporters

If you contact us to request funding for yourself or on behalf of a group or charity, we will usually collect:

- **Identity Data:** includes first name, maiden name, last name, or similar identifier, marital status, title, date of birth and gender.
- **Contact Data:** includes company name, address, email address and telephone numbers.
- **Financial Data:** includes bank account where required for grant distribution

We use your data to:

- Provide you with services or information you have requested
- Keep a record of your relationship with us
- Administer any grant requests you may have submitted
- Ensure we know how you would like us to stay in touch
- Understand how we can improve our services and information
- Further our charitable aims including fundraising

We may also use your personal information to detect and reduce fraud and credit risk.

4.3 Keeping your data safe

We will ensure that there are always appropriate technical controls in place to protect your personal details. We undertake regular reviews of who has access to information that we hold to ensure that your information is only accessible by appropriately trained staff, volunteers and contractors.

Some of our suppliers and partners may run their operations outside of the European Economic Area (EEA). Although they may not be subject to the same data protection laws as companies based within the UK, we will take all steps reasonably necessary to ensure any data handled outside of this area is covered with an adequate level of protection in accordance with UK data protection law. By submitting your personal information to us, you agree to this transfer, storing or processing at a location outside the EEA.

We may be asked to disclose your details to the police, regulatory bodies or legal advisors and will so do when bound by law.

4.4 Keeping your information up to date

We use publicly available sources to keep records up to date, we also rely on you to let us know of any changes to your contact details.

We may also obtain updated details via a third party site, where you have expressly advised that you are happy for your details to be passed on.

4.5 Sharing information

We may, where necessary, share your information with:

- Analytics and search engine providers that assist us in the improvement and optimisation of our website

If you have signed up to support one of our charitable entities alone, you will only ever be contacted in relation to this particular charity. You will not receive communications or marketing emails for any other charities which may operate as part of the Gloag Foundation unless you expressly opt in to do so.

Other than the aforementioned points, we will never sell or swap your personal details with other organisations for their marketing purposes.

4.6 Your data rights and your right to erasure

You have rights to:

- Request access to your personal data - commonly known as a “data subject access request”. This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it
- Request correction of your personal data – if the information that we hold is incomplete or inaccurate
- Request erasure of your personal data – to ask us to delete or remove data
- Object to processing of your personal data – to ask us to stop processing your data
- Right to withdraw consent.

If at any point you would like to discuss any concerns, please contact us on +44 (0) 1738 633 264 or email dataprotection@gloagfoundation.com

You have a right to ask for a copy of the information we hold about you and a right to make a complaint to the Information Commissioners Office if you believe we are not handling your data correctly.

If you want to access your information, please send a description of the information you want to see and proof of your identity by post to: Mairi Graham, The Gloag Foundation, Robertson House, 1 Whitefriars Crescent, Perth, PH2 0PA. This information will be provided to you within one month of the receipt of your request free of charge. Please note we cannot accept these requests by email.

If you have a concern about the way in which we are handling your personal information and you wish to complain to the Information Commissioner, you can do so [here](#) or by calling 0303 123 1113.

4.7 Legitimate business use

We reserve the right to continue to communicate with you and to retain your data in any instance where there is justification to do so under the legitimate interests rule as defined under Article 6(1)(f) of the GDPR 2018. We will not send any marketing communications or newsletters without your direct consent. Please click [here](#) for further information on how legitimate interests are assessed. For the purposes of this policy, our legitimate interests include relationships with sponsors, financial or in-kind donors (for thank you purposes), suppliers (for transactional business

or invoicing needs) and event attendees (for specific event information). We reserve the right to amend this list at any time with full adherence with the aforementioned Article of the legislation.

5. Use of cookies

We may also use information obtained about you from cookies (files which are sent by us to your computer or other access device) which we can access when you visit the site in future. When you visit the site, we may also log your IP address, a unique identifier for your computer or other access device.

We also include web beacons (also known as clear GIFs or web bugs) in our emails to track the success of our marketing campaigns. This means that if you open an email from us we can see which pages of our site you visit. Our web beacons do not store additional information on your computer but, by communicating with our cookies on your computer, they can tell us when you have opened our email. If you object to web beacons, we recommend you follow the instructions for deleting existing cookies and disabling future cookies below.

If you want to delete any cookies that are already on your computer, please refer to the instructions for your file management software to locate the file or directory that stores cookies. If you want to stop cookies being stored on your computer in future, please refer to your browser manufacturer's instructions by clicking "Help" in your browser menu. Further information on deleting or controlling cookies is available at www.AboutCookies.org. Please note that by deleting our cookies or disabling future cookies you may not be able to access certain areas or features of the Site.

6. Data Retention

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

7. Amendments

We may change this privacy policy from time to time. Any significant changes will be detailed on our website/s or we will make contact with you directly.

This privacy policy was last updated on 05/09/2018