

Fundraising Privacy and Personal Information Security Statement

June 2021
Policy Review Date: Jun 2022

Mull and Iona Community Trust (Scottish Charity Number SC025995 and Company Limited by Guarantee registered in Scotland, Reg No SC172897) is committed to protecting your privacy, and the personal information we hold about you. This statement explains how we handle the personal information you provide to us during our fundraising activities, and details how we go about collecting personal information to improve our fundraising.

We also have a general statement about privacy and information security related to our administrative activities. This is available by contacting the MICT office, telephone 01680 812900 or email enquiries@mict.co.uk

1. Your information and Mull and Iona Community Trust (MICT).

Under the General Data Protection Regulation (GDPR), and the UK's Data Protection Bill, we must have a legal reason to keep your personal data and process it. When MICT carries out its fundraising we will process your data under one of the lawful bases within GDPR, which are:

(a) Consent: the individual has given clear consent for you to process their personal data for a specific purpose.

(b) Contract: the processing is necessary for a contract you have with the individual, or because they have asked you to take specific steps before entering a contract.

(c) Legal obligation: the processing is necessary for you to comply with the law (not including contractual obligations).

(d) Vital interests: the processing is necessary to protect someone's life.

(e) Public task: the processing is necessary for you to perform a task in the public interest or for your official functions, and the task or function has a clear basis in law.

(f) Legitimate interests: the processing is necessary for your legitimate interests or the legitimate interests of a third party, unless there is a good reason to protect the individual's personal data which overrides those legitimate interests. (This cannot apply if you are a public authority processing data to perform your official tasks.)

In most cases the lawful basis for collecting and processing your personal information with respect to fundraising will be your express consent, but from time to time we will also act out of a legal obligation or legitimate interest.

2. What is Personal Information.

Personal information is information that can be used to identify you. It can include your name, date of birth, e-mail address, postal address, telephone number, and bank and credit/debit card details. It may also include family and other personal contacts.

Organisations collecting donation information on our behalf, for example online donation services, may also collect this information and your credit/debit card details.

By giving us your personal details, you agree that all the information you provide may be

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processed in the manner and for the purposes described below.

3. Why and how we use your information and keep it safe.

We collect this information when you become a member, donate money, undertake fundraising activities on our behalf, or otherwise give us personal information online, in paper or electronic form, over the phone or face to face. We hold information to enable you to make your donation and for us to acknowledge its receipt and reassure you about the use of your gift.

Your personal information is treated as strictly confidential and will be shared only where it is completely necessary to perform our managerial and other responsibilities.

We ensure that there are appropriate technical and security controls in place to protect your personal details, including routine monitoring and protection of electronic networks, and secure storage of paper records.

We may need to share your information with companies that provide data management and electronic services for us. We have strict data protection arrangements in place to control the processing and storage of your information.

We may be obliged to share your personal information if we are legally required to do so. This includes providing information, with your signed consent, to HMRC to enable us to claim Gift Aid on your donation, and meeting the requirements of accounting and auditing law. In such cases, only the minimum information required to meet our obligations will be provided.

We do not, and never will, sell or swap your personal information with another organisation unless we are required to by law.

Any information we collect is stored securely and processed in the UK or European Economic Area. In any case where data is shared with organisations based in the USA, we ensure it is covered by the international Privacy Shield Framework.

4. How we collect information about you, and how it helps with our fundraising.

Fundraising is a vital part of our work. Without the donations and grants we receive we simply would not be able to continue to improve the lives and opportunities for those who live and work on Mull and Iona, and provide services for them and the people who visit our islands.

But you have the right for the information you give us to be used sensitively, lawfully, and securely.

We collect information about you in the following ways:

- When you give it to us directly. This may be through paper or electronic correspondence, providing information at events, phone calls etc.
- When you give it to us indirectly. Your information may be shared with us by independent organisations such as online fundraising services, fundraisers taking part in events, funeral directors, solicitors and other similar intermediate organisations. Those people will only provide us with information when you have indicated that you want to support Mull and Iona Community Trust, and with your consent. If you have any concerns about the use and transfer of such information you should check their privacy policies when you provide your information to understand how they will process the information you give them.
- When you give permission to other organisations to share it. Depending on the privacy and settings you may apply to social media and messaging apps such as Facebook,

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WhatsApp, and Twitter, you might provide permission for us to access information from your accounts with those services. You may also provide information for third party organisations to share your information with us where you require us to contact you when you are interested in donating.

- From other publicly available information sources. In some cases, for example to verify your address or post code when we have a legitimate reason to contact you (for example the information on a donation form is illegible), we reserve the right to use publicly available sources of information such as Google and other search engines to ensure the accuracy of the information we hold about you.

Above all, our main intention is to better understand the wishes of our donors, supporters and potential supporters so that we can encourage and enable them to be as fully involved in the work of MICT as they wish, and so that we can be sure we pursue their express interests. Sometimes this may involve the collection and use of specific personal and/or protected information such as health, disability, your marriage/civil partnership status, your race, or religious beliefs. We will always make it clear why this information would be of benefit to you and us.

Where we have your permission, we may invite you to support our work by donating, buying a raffle ticket, getting involved in fundraising activities or leaving a gift in your will.

Occasionally, we may invite supporters to attend events where they can find out more about the ways donations and gifts in wills make a difference. We'll keep a record of which events you are invited to and whether you were able to attend.

If you interact or have a conversation with us, we'll note anything relevant and store this securely on our systems.

If you tell us you want to fundraise to support our cause, we'll use the personal information you give us to record your plans and contact you to support your fundraising efforts.

The law also requires us to know where funds have come from, as well as any conditions attached to them. We follow a due diligence process which involves researching the financial soundness, credibility, reputation and ethical principles of donors who've made, or are likely to make, a significant donation to us. As part of this process, we'll carry out research using publicly available information and professional resources.

In addition to maintaining records associated with donations or charity shop purchases in general, there are particular circumstances where we may seek to gather other information as well. Where at all possible we will seek to do this with your consent, but there may be times when this is not possible, and we will gather information out of legitimate interest.

Seeking donations and better understanding our supporters' interests.

Where we have your consent, we may use your contact information to invite you to meetings and events; send information about projects you may be interested in supporting; and update you on the impact your support is making.

If you are a member of MICT this typically includes contact and membership details; the amount and purpose of any previous donations; a record of communications we have sent or received from you.

We may use your information alongside information provided by other donors/members to help us understand the general interests of supporters like you, so that we can target our communications more effectively in future and use our resources as cost effectively as

possible.

Donating or Buying Through Our Charity Shops.

Data collected by our charity shops is used to fulfil your purchase requirements and enable us to provide the best service we can.

If you use your debit or credit card to donate to us, buy something, or pay for something by other means, we will ensure this is done securely. We do not store your credit/debit card details once the transaction is complete. All card details are securely destroyed once the payment or donation has been processed. Only staff/volunteers authorised and trained to process payments can see your card details.

MICT uses CCTV in some of its retail and goods donation sites in order to keep staff, volunteers and customers safe. We comply with the Information Commissioner's Office's CCTV Code of Practice.

Legacies/Gifts in Wills.

If you've told us that you have left a gift in your will, or are thinking about doing so, we will keep details of this. If we have a conversation or interaction with you (or with someone who contacts us in relation to your will, such as your solicitor), we'll make a note of these throughout your relationship with us, as this helps to ensure we direct your gift as you wanted.

Where a donor has died and we are in the process of receiving their legacy gift, we will process personal data of individuals involved in the estate administration for the purpose of ensuring our compliance with legal obligations in receiving and using the legacy for our charitable purposes. Access to this personal data is restricted and stored for as long as necessary to administer the legacy.

We follow our legitimate interests to process personal data of individuals involved with the supporter and their estate. This may include, for example, collecting information about executors, or copies of wills. We may also need to contact and keep information about other co-beneficiaries within the will. We may also need to contact next of kin or other surviving family members.

Where we would like to process data that is not for the direct purpose of administering the legacy, we will seek specific consent from an individual, for example, if we would like to remain in contact with a donor's relative to update them on how the legacy has been used to benefit a specific area of MICT's work.

Direct Marketing.

We may contact you in general, from time to time, for example to keep you up to date about MICT's work, or to encourage you to become part of MICT's activities (for example through membership). This may be by post or by telephone, unless you have told us you do not wish to be contacted in this way, or you are registered with the Telephone Preference Service (TPS) and have not told us that you are happy to be telephoned by us.

Should we do this, we will invite you to tell us in future how you want us to communicate in ways that best suit you.

We will always provide you with the option not to receive further contact from us, or to manage the frequency with which you are contacted, at which time we will explain the potential effects of your decision so that you can make an informed judgement.

5. The accuracy of your information and keeping it up to date.

The accuracy of the information we hold about you is important to us. We ask that you please let us know if you move house or otherwise change your contact details so that we can keep our records up to date. If mail (postal or electronic) addressed specifically to you is returned to us as 'moved away' or similar, we may use publicly available sources to double check and update your details.

You can update your information by e-mailing enquiries@mict.co.uk or calling 01680 812 900.

6. Digital information.

The charity does not collect information about you from our directly controlled electronic sources like websites, without your express permission.

Our contact details may be held by other websites, information services, or by third party organisations enabling you to contact us directly. In all cases you should make sure that you have read the other organisation's website and other privacy policies.

7. E-mails/Mobile Phone Messages.

Please be aware that e-mails and data transferred via mobile phones are not always secure:

- If we are going to send you personal data or other sensitive information, we will ensure that this is done safely and securely.
- You should consult your email provider for information about the security affecting emails or mobile data you send us.

8. About this privacy statement.

We may modify, add or remove sections of this privacy statement from time to time.

Please check the date of this one, and if you are concerned it may be out of date, please contact us using the details below.

Opting out of Mull and Iona Community Trust communications:

If you do not wish to receive future communications from us, please contact us via:

Mull and Iona Community Trust
An Roth Community Enterprise Centre
Craignure
Isle of Mull
PA65 6AY

Tel: 01680 812900

E-mail: enquiries@mict.co.uk

Access rights:

You have the right to access the personal information we hold about you. If you wish to obtain a copy of this information, please write to us or email us at the contact point above, enclosing your postal address.

Privacy queries or complaints:

If you have any questions or complaints about the personal information we have about you, or how it has been used, please contact us.

If your complaint is unresolved to your satisfaction, you can also contact either:

1. Complaints to the Scottish Fundraising Standards Panel.

The Scottish Fundraising Standards Panel, of which MICT is a member, is the body that is responsible for fundraising standards in Scotland and the handling of fundraising complaints relating to Scottish registered charities. It does this within the guidance provided by The Code of Fundraising Practice (<https://www.fundraisingregulator.org.uk/code>), which outlines the standards expected of all charitable fundraising organisations across the UK.

The Panel's specific interest in data protection and privacy concentrates on:

- A charity's complaints-handling process. For example, a complainant may not have been treated with due courtesy or respect, or not received a response to a fundraising concern within a reasonable period of the complaint being made.
- Issues related to the management of an individual's contact preferences with charities. This may include instances where an individual has been contacted by a particular charity despite their express wish that this should not happen.

The Panel is also able to receive complaints about how we carry out our fundraising in general, and any particular concerns you have had about your contacts with us.

In the first instance you should always try to resolve any complaint you have by contact MICT directly. However, if you are unhappy with how we have dealt with your complaint The Scottish Fundraising Standards Panel has its own complaints procedure, which you can access via <https://www.goodfundraising.scot/make-a-complaint/> or by calling 0808 164 2520.

2. Complaints to the Information Commissioner's Office.

The information Commissioner's Office (ICO) (<https://ico.org.uk>) is the UK's independent authority set up to uphold information rights in the public interest, promoting openness by public bodies and data privacy for individuals.

The ICO will consider all complaints, but it has a particular role to deal with complaints about data management and privacy that are not related to fundraising. If your complaint is fundraising related the Scottish Fundraising Standards Panel (see above) can refer complaints to the ICO if they feel they have not been properly addressed by other means.

It has a helpline that members of the public can use to report a data breach or any other concerns they may have. The helpline can be accessed via 0303 123 1113.

This Privacy Notice was updated and approved by the MICT board of directors – June 2021.