

# Customer Contact Privacy Notice

## WHAT IS THE PURPOSE OF THIS DOCUMENT?

Volunteer Scotland is committed to protecting the privacy and security of your personal information.

This privacy notice describes how we collect and use personal information about you during and after your contact with us as a customer, in accordance with the General Data Protection Regulation (GDPR).

Volunteer Scotland is a “data controller”. This means that we are responsible for deciding how we hold and use personal information about you. We are required under data protection legislation to notify you of the information contained in this privacy notice.

This notice applies to individuals who submit enquiries as external customers, either individually or on behalf of an organisation or otherwise access or use our services. This notice does not form part of any contract to provide services. We may update this notice at any time.

It is important that you read this notice, together with any other privacy notice we may provide on specific occasions when we are collecting or processing personal information about you, so that you are aware of how and why we are using such information.

## DATA PROTECTION PRINCIPLES

We will comply with data protection law. This says that the personal information we hold about you must be:

1. Used lawfully, fairly and in a transparent way.
2. Collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes.
3. Relevant to the purposes we have told you about and limited only to those purposes.
4. Accurate and kept up to date.
5. Kept only as long as necessary for the purposes we have told you about.
6. Kept securely.

## THE KIND OF INFORMATION WE HOLD ABOUT YOU

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).

There are “special categories” of more sensitive personal data which require a higher level of protection.

We may collect, store, and use the following categories of personal information about you:

- Personal contact details such as name, title, addresses, job title, telephone numbers, and personal email addresses.
- Social media account names

### HOW IS YOUR PERSONAL INFORMATION COLLECTED?

We typically collect personal information about you when you submit an enquiry or to us by telephone, e-mail, in writing, by means of an online form or in person. We may also collect information about you as part of a transactional business relationship in order to contact you in the future.

We may sometimes collect additional information from third parties e.g. the organisation you work for or volunteer on behalf of

### HOW WE WILL USE INFORMATION ABOUT YOU

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

1. Where we need to perform any contract we may enter into with you.
2. Where we need to comply with a legal obligation.
3. 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.

We may also use your personal information in the following situations, which are likely to be rare:

1. Where we need to protect your interests (or someone else's interests).
2. Where it is needed in the public interest [or for official purposes].

### Situations in which we will use your personal information

We need all the categories of information in the list above (see *The kind of information we hold about you*) primarily to allow us to pursue legitimate interests of our own or those of third parties, provided your interests and fundamental rights do not override those interests. The situations in which we will process your personal information are listed below.

- To respond to enquiries about volunteering, volunteering best practice, website and opportunity queries, training queries, Disclosure Services general queries, Finance/HR/Facilities queries, Research enquiries, marketing enquiries
- Storing your contact details in our customer database (CRM; Salesforce) for the purpose of contacting you at a later date in respect of your query
- Providing statistical information on the types of enquiries we receive and from which types of organisations in aggregate format
- To be able to contact you if an ongoing business relationship is developed in connection to the services that Volunteer Scotland offers.
- Maintaining basic personal information (e.g. name, job title and signature) for the purposes of keeping a record of a contract between your organisation and Volunteer Scotland.
- To approach you with a request to opt in to marketing information (please see separate Volunteer Scotland privacy notice in relation to marketing)

Some of the above grounds for processing will overlap and there may be several grounds which

justify our use of your personal information.

### **If you fail to provide personal information**

If you fail to provide certain information when requested, we may not be able to perform any contract we have entered into with you, or we may be prevented from complying with our legal obligations.

### **Change of purpose**

We will only use your personal information for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If we need to use your personal information for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal information without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

### **SENSITIVE PERSONAL INFORMATION**

It is not envisaged that we will collect particularly sensitive personal data or 'special category' data as part of the

### **INFORMATION ABOUT CRIMINAL CONVICTIONS**

We do not envisage that we will hold information about criminal convictions.

### **AUTOMATED DECISION-MAKING**

We do not envisage that any decisions will be taken about you using automated means, however we will notify you in writing if this position changes.

### **DATA SHARING**

We may have to share your data with third parties, including third-party service providers and other entities in the group.

We require third parties to respect the security of your data and to treat it in accordance with the law.

We may transfer your personal information outside the EU.

If we do, you can expect a similar degree of protection in respect of your personal information.

### **Why might you share my personal information with third parties?**

We may share your personal information with third parties where required by law, where it is necessary to administer the relationship with you or where we have another legitimate interest in doing so.

### **Which third-party service providers process my personal information?**

"Third parties" includes third-party service providers (including contractors and designated agents) and other entities within our group. The following third-party service providers process personal information about you for the following purposes: Law at work - legal advice; Salesforce – customer database management provider; Eventbrite – event management system provider

### **How secure is my information with third-party service providers and other entities in our group?**

All our third-party service providers and other entities in the group are required to take appropriate

security measures to protect your personal information in line with our policies. We do not allow our third-party service providers to use your personal data for their own purposes. We only permit them to process your personal data for specified purposes and in accordance with our instructions.

### **What about other third parties?**

We may share your personal information with a regulator or to otherwise comply with the law.

### **Transferring information outside the EU**

We may transfer the personal information we collect about you to the following country outside the EU in order to perform our contract with you: United States (Eventbrite). There is an adequacy decision by the European Commission in respect of that country. This means that the country to which we transfer your data are deemed to provide an adequate level of protection for your personal information.

## **DATA SECURITY**

We have put in place measures to protect the security of your information. Details of these measures are available upon request.

Third parties will only process your personal information on our instructions and where they have agreed to treat the information confidentially and to keep it secure.

We have put in place appropriate security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal information to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal information on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so.

## **DATA RETENTION**

### **How long will you use my information for?**

We will only retain your personal information 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. Details of retention periods for different aspects of your personal information are available in our retention schedule which is provided at appendix I. 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.

In some circumstances we may anonymise your personal information so that it can no longer be associated with you, in which case we may use such information without further notice to you. Otherwise we will retain and securely destroy your personal information in accordance with our data retention schedule.

## **RIGHTS OF ACCESS, CORRECTION, ERASURE, AND RESTRICTION**

### **Your duty to inform us of changes**

It is important that the personal information we hold about you is accurate and current. Please keep us informed if your personal information changes during your relationship with us.

## Your rights in connection with personal information

Under certain circumstances, by law you have the right to:

- **Request access** to your personal information (commonly known as a “data subject access request”). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.
- **Request correction** of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.
- **Request erasure** of your personal information. This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal information where you have exercised your right to object to processing (see below).
- **Object to processing** of your personal information where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground. You also have the right to object where we are processing your personal information for direct marketing purposes.
- **Request the restriction of processing** of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.
- **Request the transfer** of your personal information to another party.

If you want to review, verify, correct or request erasure of your personal information, object to the processing of your personal data, or request that we transfer a copy of your personal information to another party, please e-mail [hello@volunteerscotland.org.uk](mailto:hello@volunteerscotland.org.uk)

### No fee usually required

You will not have to pay a fee to access your personal information (or to exercise any of the other rights). However, we may charge a reasonable fee if your request for access is clearly unfounded or excessive. Alternatively, we may refuse to comply with the request in such circumstances.

### What we may need from you

We may need to request specific information from you to help us confirm your identity and ensure your right to access the information (or to exercise any of your other rights). This is another appropriate security measure to ensure that personal information is not disclosed to any person who has no right to receive it.

### RIGHT TO WITHDRAW CONSENT

In the limited circumstances where you may have provided your consent to the collection, processing and transfer of your personal information for a specific purpose, you have the right to withdraw your consent for that specific processing at any time. To withdraw your consent, please contact [hello@volunteerscotland.org.uk](mailto:hello@volunteerscotland.org.uk) Once we have received notification that you have withdrawn your consent, we will no longer process your information for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so in law.

### CHANGES TO THIS PRIVACY NOTICE

We reserve the right to update this privacy notice at any time, and we will provide you with a new privacy notice when we make any substantial updates. We may also notify you in other ways from time to time about the processing of your personal information.

**If you have any questions about this privacy notice, please contact [hello@volunteerscotland.org.uk](mailto:hello@volunteerscotland.org.uk)**

Ref	Section	Further details	Personal information held	Why is the data processed and what do we do with it?	What is the lawful basis for processing?	Potential transfer to third parties	Sensitive ?	What are the grounds for processing sensitive data	Source	Retention period
106	liV Services	BD - Agreements (contracts)	Full name	We process this information to assist with the delivery of agreed services and keep the agreement details that form part of the commercial contract	Legitimate interests	No			Agreements	6 years for HMRC purposes
107	liV Services	BD - Agreements (contracts)	Business/Personal Address	We process this information to assist with the delivery of agreed services and keep the agreement details that form part of the commercial contract	Legitimate interests	no			Agreements	6 years for HMRC purposes
108	liV Services	BD - Agreements (contracts)	Telephone number	We process this information to assist with the delivery of agreed services and keep the agreement details that form part of the commercial contract	Legitimate interests	no			Agreements	6 years for HMRC purposes
109	liV Services	BD - Agreements (contracts)	Job title / role	We process this information to assist with the delivery of agreed services and keep the agreement details that form part of the commercial contract	Legitimate interests	no			Agreements	6 years for HMRC purposes
110	liV Services	BD - Agreements (contracts)	E-mail address	We process this information to assist with the delivery of agreed services and keep the agreement details that form part of the commercial contract	Legitimate interests	no			Agreements	6 years for HMRC purposes
111	liV Services	BD - Agreements (contracts)	Signature	We process this information to assist with the delivery of agreed services and keep the agreement details that form part of the commercial contract	Legitimate interests	no			Agreements	6 years for HMRC purposes
18	liV Services	BD - General enquiries	Full name	Contact data is used to respond to the specific enquiry and provide information requested.	Legitimate interests	No			Hello emails, phone calls or events	3 year months for reporting stats to funders and tracking purposes
19	liV Services	BD - General enquiries	Address or business address	Contact data is used to respond to the specific enquiry and provide information requested.	Legitimate interests	No			Hello emails, phone calls or events	3 year months for reporting stats to funders and tracking purposes
20	liV Services	BD - General enquiries	Mobile Telephone number or business	Contact data is used to respond to the specific enquiry and provide information requested.	Legitimate interests	No			Hello emails, phone calls or events	3 year months for reporting stats to funders and tracking purposes
21	liV Services	BD - General enquiries	Job title	Contact data is used to respond to the specific enquiry and provide information requested.	Legitimate interests	No			Hello emails, phone calls or events	3 year months for reporting stats to funders and tracking purposes
22	liV Services	BD - General enquiries	E-mail address or business	Contact data is used to respond to the specific enquiry and provide information requested.	Legitimate interests	No			Hello emails, phone calls or events	3 year months for reporting stats to funders and tracking purposes
23	liV Services	BD - General enquiries	Org name	Contact data is used to respond to the specific enquiry and provide information requested.	Legitimate interests	No			Hello emails, phone calls or events	3 year months for reporting stats to funders and tracking purposes
24	liV Services	BD - General enquiries	Social media account names/addresses/handles	Contact data is used to respond to the specific enquiry and provide information requested.	Legitimate interests	No			Hello emails, phone calls or events	3 year months for reporting stats to funders and tracking purposes
84	liV Services	BD - individuals in external organisations, volunteer management and or other professional networks	Full name	Business contact information for the purposes of carrying out our general services	Legitimate interests	no			From individual by phone/email/in person	3 year months for reporting stats to funders and tracking purposes
85	liV Services	BD - individuals in external organisations, volunteer management and or other professional networks	Telephone number or business number	Business contact information for the purposes of carrying out our general services	Legitimate interests	no			From individual by phone/email/in person	3 year months for reporting stats to funders and tracking purposes
86	liV Services	BD - individuals in external organisations, volunteer management and or other professional networks	Email address or business email	Business contact information for the purposes of carrying out our general services	Legitimate interests	no			From individual by phone/email/in person	3 year months for reporting stats to funders and tracking purposes
87	liV Services	BD - individuals in external organisations, volunteer management and or other professional networks	Social media account names/addresses/handles	Business contact information for the purposes of carrying out our general services	Legitimate interests	no			From individual by phone/email/in person	3 year months for reporting stats to funders and tracking purposes
125	Room bookings	Room bookings	Address	To use Volunteer Scotland rooms	Legitimate interests				Room Booking Form	2 years after last contact for performance statistics / records
126	Room bookings	Room bookings	E-mail address	To use Volunteer Scotland rooms	Legitimate interests				Room Booking Form	2 years after last contact for performance statistics / records

Ref	Section	Further details	Personal information held	Why is the data processed and what do we do with it?	What is the lawful basis for processing?	Potential transfer to third parties	Sensitive ?	What are the grounds for processing sensitive data	Source	Retention period
	Corporate Services	Reception	Full name	Contact data is used to respond to the specific enquiry and provide information requested.	Legitimate interests				Hello emails, phone calls or events	2 years after last contact for performance statistics / records
	Corporate Services	Reception	Address or business address	Contact data is used to respond to the specific enquiry and provide information requested.	Legitimate interests				Hello emails, phone calls or events	2 years after last contact for performance statistics / records
	Corporate Services	Reception	Mobile Telephone number or business	Contact data is used to respond to the specific enquiry and provide information requested.	Legitimate interests				Hello emails, phone calls or events	2 years after last contact for performance statistics / records
	Corporate Services	Reception	Job title	Contact data is used to respond to the specific enquiry and provide information requested.	Legitimate interests				Hello emails, phone calls or events	2 years after last contact for performance statistics / records
	Corporate Services	Reception	E-mail address or business	Contact data is used to respond to the specific enquiry and provide information requested.	Legitimate interests				Hello emails, phone calls or events	2 years after last contact for performance statistics / records
	Corporate Services	Reception	Org name	Contact data is used to respond to the specific enquiry and provide information requested.	Legitimate interests				Hello emails, phone calls or events	2 years after last contact for performance statistics / records
	Corporate Services	Reception	Social media account names/addresses/handles	Contact data is used to respond to the specific enquiry and provide information requested.	Legitimate interests				Hello emails, phone calls or events	2 years after last contact for performance statistics / records
	Marketing & Communications	Helpdesk	Full name	Contact data is used to respond to the specific enquiry and provide information requested.	Legitimate interests				Hello emails, phone calls or events	2 years after last contact for performance statistics / records
	Marketing & Communications	Helpdesk	Address or business address	Contact data is used to respond to the specific enquiry and provide information requested.	Legitimate interests				Hello emails, phone calls or events	2 years after last contact for performance statistics / records
	Marketing & Communications	Helpdesk	Mobile Telephone number or business	Contact data is used to respond to the specific enquiry and provide information requested.	Legitimate interests				Hello emails, phone calls or events	2 years after last contact for performance statistics / records
	Marketing & Communications	Helpdesk	Job title	Contact data is used to respond to the specific enquiry and provide information requested.	Legitimate interests				Hello emails, phone calls or events	2 years after last contact for performance statistics / records
	Marketing & Communications	Helpdesk	E-mail address or business	Contact data is used to respond to the specific enquiry and provide information requested.	Legitimate interests				Hello emails, phone calls or events	2 years after last contact for performance statistics / records
	Marketing & Communications	Helpdesk	Org name	Contact data is used to respond to the specific enquiry and provide information requested.	Legitimate interests				Hello emails, phone calls or events	2 years after last contact for performance statistics / records
	Marketing & Communications	Helpdesk	Social media account names/addresses/handles	Contact data is used to respond to the specific enquiry and provide information requested.	Legitimate interests				Hello emails, phone calls or events	2 years after last contact for performance statistics / records
	Volunteer Impact Assessment Toolkit	Volunteer Impact Assessment Toolkit	Email address or business email	Personal details used to provide a Volunteer Impact Assessment toolkit on request	Legitimate interests				VIAT	2 years after last contact for performance statistics / records
	Volunteer Impact Assessment Toolkit	Volunteer Impact Assessment Toolkit	Full name	Personal details used to provide a Volunteer Impact Assessment toolkit on request	Legitimate interests				VIAT	2 years after last contact for performance statistics / records
	Volunteer Impact Assessment Toolkit	Volunteer Impact Assessment Toolkit	Postal address	Personal details used to provide a Volunteer Impact Assessment toolkit on request	Legitimate interests				VIAT	2 years after last contact for performance statistics / records