

## Research & Evaluation 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 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 all external users of our research and evaluation 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, telephone numbers, and personal email addresses.

We may also collect, store and use the following “special categories” of more sensitive personal information:

- Nationality; health information race or ethnic origin; politics; religion; trade union membership; or sexual orientation.

## **HOW IS YOUR PERSONAL INFORMATION COLLECTED?**

We typically collect personal information for research and evaluation purposes through surveys (postal and online), interviews (telephone and face-to-face), focus groups, case studies (including audio and visual content), conference delegate lists, survey sampling (distribution) lists and project work.

We may sometimes collect additional information from third parties such as clients and contractors. The appropriate level of approval and consent will be obtained with these third parties based upon Volunteer Scotland’s role as either data controller and/or data processor.

We may seek the views of third parties relevant to research we are leading. For example, in seeking the views of young people who are volunteering we may wish to supplement this with additional information from their parents and/or teachers to learn more about the impact of volunteering on young people. Again, where this type of research is intended to be carried out, the appropriate level of approval and consent will be obtained from all involved parties.

## **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 you have given your informed consent to allow your personal information to be used for a specific purpose.
2. Where we need to perform the contract we have entered into with you.
3. Where we need to comply with a legal obligation.
4. 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*) and we will collect, process and store where you have provided consent; in some cases we may use your personal information 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. Further details can be found at appendix I.

- To gather quantitative and qualitative information through surveys, interviews, focus groups and case studies to enable us to examine and explore volunteering in a variety of contexts

- To monitor and evaluate VS engagement with stakeholders to help inform both the future strategic direction of the organisation and the volunteering agenda in Scotland
- To complete projects where survey findings and interview transcripts are required; where the data provides proof of findings
- To obtain information from external stakeholders using online surveys and other research methods to enable the services we provide to be evaluated

Some of the above grounds for processing will overlap and there may be several grounds which justify our use of your personal information.

### **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.

### **PARTICULARLY SENSITIVE PERSONAL INFORMATION**

"Special categories" of particularly sensitive personal information require higher levels of protection. We need to have further justification for collecting, storing and using this type of personal information. We may process special categories of personal information in the following circumstances:

- With your explicit consent.

Less commonly, we may process this type of information where it is needed in relation to legal claims or where it is needed to protect your interests (or someone else's interests) and you are not capable of giving your consent, or where you have already made the information public.

### **RIGHT TO WITHDRAW CONSENT**

In the 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 the Strategic Performance Manager. 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.

### **INFORMATION ABOUT CRIMINAL CONVICTIONS**

We do not envisage that the research and evaluation section will hold information about criminal convictions.

### **AUTOMATED DECISION-MAKING**

Automated decision-making takes place when an electronic system uses personal information to make a decision without human intervention. We are allowed to use automated decision-making in the following circumstances:

1. Where we have notified you of the decision and given you 21 days to request reconsideration.
2. Where it is necessary to perform the contract with you and appropriate measures are in place to safeguard your rights.
3. In limited circumstances, with your explicit written consent and where appropriate measures are in place to safeguard your rights.

If we make an automated decision on the basis of any particularly sensitive personal information, we must have either your explicit written consent or it must be justified in the public interest, and we must also put in place appropriate measures to safeguard your rights.

You will not be subject to decisions that will have a significant impact on you based solely on automated decision-making, unless we have a lawful basis for doing so and we have notified you.

## **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 (details below in *Transferring 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 working 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. We may use third-party service providers such as contractors to process personal information about you to assist us in the analysis and interpretation of research and evaluation studies we carry out. In addition, we use Survey Monkey to support our online survey work. We may use Eventbrite in the course of our activities.

### **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.

### **When might you share my personal information with other entities in the group?**

We will not share any of your personal information with any entities within Volunteer Scotland or Volunteer Scotland Disclosure Services.

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

We may share your personal information with other third parties, for example in the context of the possible restructuring of the business. We may also need to 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 (Survey monkey/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 you

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 the document in 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 in appendix I.

## 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 working 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 contact [POSITION] in writing.

#### **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 the Strategic Performance Manager. 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.

#### **QUERIES**

If you have any questions about this privacy notice or how we handle your personal information, please contact the Human Resources Manager. You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues.

#### **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.

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
	Research	NHS Lothian Project	Name, job title, organisation, quotes (interview participants)	Requirement of project to carry out interviews - transcripts provide proof of findings	Legitimate interests	No			Interview transcripts (Word Doc)	2 years
	Research	Stakeholder Surveys	Name, telephone number and email address	Collected to assess VS engagement with stakeholders - retained for future analysis	Consent	No			Spreadsheet	5 years
	Research	Europe for Citizens project survey data	Name	Collected as part of the agreed work activities of the EforC project. Data will be analysed and anonymised results will be shared with project partners and eventually published in all partner countries.	Consent	No			SurveyMonkey and spreadsheet	2 years
	Research	Europe for Citizens project survey data	E-mail		Consent	No			SurveyMonkey and spreadsheet	2 years
	Research	Europe for Citizens project survey data	Educational achievement		Consent	No			SurveyMonkey and spreadsheet	2 years
	Research	Europe for Citizens project survey data	Country of residence		Consent	No			SurveyMonkey and spreadsheet	2 years
	Research	Europe for Citizens project survey data	Age		Consent	No			SurveyMonkey and spreadsheet	2 years
	Research	Europe for Citizens project survey data	Gender		Consent	No			SurveyMonkey and spreadsheet	2 years
	Research	Europe for Citizens project survey data	Disability		Consent	No	Y	Consent	SurveyMonkey and spreadsheet	2 years
	Research	Europe for Citizens project survey data	Nationality		Consent	No	Y	Consent	SurveyMonkey and spreadsheet	2 years
	Research	Survey info	Sexual orientation	May be collected for research surveys - will only be collected with explicit consent	Consent	No	Y	Consent	SurveyMonkey and spreadsheet	2 years
	Research	Survey info	Trade union membership	May be collected for research surveys - will only be collected with explicit consent	Consent	No	Y	Consent	SurveyMonkey and spreadsheet	2 years
	Research	Survey info	Religion/belief	May be collected for research surveys - will only be collected with explicit consent	Consent	No	Y	Consent	SurveyMonkey and spreadsheet	2 years
	Research	Survey info	Race or ethnic origin	May be collected for research surveys - will only be collected with explicit consent	Consent	No	Y	Consent	SurveyMonkey and spreadsheet	2 years
	Research	Survey info	Political opinion	May be collected for research surveys - will only be collected with explicit consent	Consent	No	Y	Consent	SurveyMonkey and spreadsheet	2 years
	Research	Consents	address, postal address and signature	To maintain a record of consent for GDPR purposes	Legal obligation	No			spreadsheet and word docs	Retention period will be the same as the data that the consent relates to