

# **Privacy Policy**

This policy applies to personal information we hold about individuals. It does not apply to information we hold about companies and other organisations.

Epilepsy Scotland believes that we have a fundamental duty to keep your data secure, so you can have confidence when working with us, learning about our work and supporting us. We have developed this policy to help you understand what we do with your data. We appreciate the trust you place in us and in return we respect your privacy and are committed to protecting your personal information.

We may amend this policy from time to time, so we recommend that you review it every so often to ensure that you're aware of any changes. This policy was last updated on 5 June 2020.

This policy is written in accordance with the General Data Protection Regulation (GDPR) 2018 and with the Data Protection Act 1998.

Within this policy we will set out clearly how we collect, use, disclose and manage your personal information. By submitting your data you are accepting this privacy policy and authorise Epilepsy Scotland to collect, store and process your information in the ways explained.

# How do we collect your personal information?

We **may** collect certain personal information from you when you;

- \* register for an event or fundraising challenge
- \* access our training courses
- \* attend our virtual training courses
- \* make a purchase online, by telephone or by post
- \* make a donation towards our work
- \* complete a Gift Aid declaration
- \* arrange a Direct Debit or Standing Order directly with us
- contact us directly for any reason, including enquiring about or purchasing our products and services, requesting further information, seeking assistance or reporting a problem with your account or our website
- \* when you subscribe to receive our alerts and newsletters, participate in our promotions, and filling in forms and applications
- \* when you register with one of our services.

#### Why do we collect your personal information?

We need to collect and use your personal information to:

\* provide you with the information and/ or services you have requested from us



- \* respond to your enquiries and requests for assistance
- \* tell you about changes to our services
- \* obtain your feedback about our services or website
- \* comply with our legal and contractual obligations
- help prevent and detect fraud.

### What personal information do we collect?

In most cases, we will only ask for your name and contact details (plus payment details if you are joining or donating). Sometimes, we may ask for additional information where it may either help us to report to funders or apply for grants, or to help us keep our communications relevant to you.

- your name and contact details including your home address, contact telephone number and email address
- \* your date of birth
- your bank account or payment details
- \* photographs
- \* video recordings of online training courses

We will also collect information such as your Internet Protocol (IP) address for monitoring and improving the effectiveness of our website services as well its security. We may store relevant information about you that you voluntarily share with us. We will only collect sensitive personal data where absolutely necessary and with your explicit consent. All data collected will be retained only for an appropriate length of time and will be securely archived or deleted after this time.

### Who has access to your personal information?

We endeavour to ensure the security, integrity and privacy of the personal information we collect. We do our very best to ensure the security of personal information to protect it from unauthorised access, use, modification, destruction or disclosure.

Epilepsy Scotland will never sell your data to any other organisation. In certain circumstances we may share your personal information with third parties, this includes:

- setting up a regular payment agreement with our bank or a third-party processor
- \* DWP if we are supporting you with a benefit query
- \* safeguarding issues eg passing information to Social Services, schools or Police Scotland
- other organisations supporting our work eg a charity or supplier who will share materials with you as part of our service



- video recordings of virtual training courses may be shared with other participants
- \* where we are otherwise authorised or required by law to do so.

In all these cases these third parties only have access to the data they need to handle the process and do not have permission to use it for any other purposes.

Within Epilepsy Scotland, only those authorised to process your data can access your data. We work hard to ensure our staff and volunteers can only see the data they need to perform their tasks. Those who do are obliged to respect the confidentiality of any personal information held by us. All our staff are trained to understand data protection and what they need to do to keep your data secure.

### How long do we keep this information?

We'll only store your personal data for as long as is necessary to fulfil the purposes outlined in this Privacy Policy or for as long as we reasonably consider necessary to establish, exercise or defend our legal rights. Your data will be retained in line with our statutory and regulatory obligations. The criteria we used to determine these retention periods includes:

- \* the statutory retention periods for accounting records, as set by the Companies Act and HM Revenue & Customs (HMRC).
- \* the requirements of the Care Inspectorate

#### How do we use your personal information?

Epilepsy Scotland uses your data in a variety of different ways including:

- \* providing you with information or products that you have requested from us
- \* processing donations and registration or event fees received from you
- \* making enquiries or informing you about your interactions with us (eg resolving issues with Direct Debits, or informing you of changes to events)
- \* responding to any complaints from you
- \* keeping you updated on our work
- \* informing you of volunteering opportunities
- \* inviting you to participate in surveys or research
- \* inviting you to fundraising events, challenges or activities
- \* reviewing records such as for financial audits
- \* updating you on our services.

In order to do some of these tasks we may build up a profile of you based on the interactions you have had with us. Such profiling may include details of your past engagement with us. For example, in deciding who to email about a Ladies Lunch



event in Glasgow, we might look at which supporters have supported similar events or events in that area in the past. This enables us to most effectively target relevant information and appropriate requests for support. This does not affect any of your rights or limit you in how you can get involved with us and the work that we do.

### How Epilepsy Scotland will communicate with you

We may send you communications by email, mail or contact you on the telephone if we have your consent or we believe you would be interested in hearing from us, unless you have expressed a preference not to receive such content. We will continue to send members, those who make regular donations, or have made a one-off donation in the past eighteen months our supporter bulletin, The Bridge. You may also see advertising online and on some social media sites if you have supported us before, or if your use of these channels suggests that you would find our campaigns relevant. To respond to your queries we will contact you either via the medium you used to contact us or by a medium you have indicated you would like us to respond with. If we need to contact you for any administrative purposes then we will usually email you or call you depending on what contact details we have available for you.

You can unsubscribe from our emails at any time through the unsubscribe link at the end of all our emails and stop seeing any social media advertising through settings on those sites.

You can also change your mind on how you would like us to contact you or tell us that you would no longer like to hear from us by calling 0141 427 4911 or emailing us at contact@epilepsyscotland.org.uk.

#### How to find out more or make a complaint

Epilepsy Scotland operates in accordance with all relevant UK data protection laws. If you would like to find out more about these laws and how you could be affected beyond what is mentioned in this privacy policy, please visit the Information Commissioner's Office.

You have a right to ask for a copy of the information we hold about you, which we will supply to you within one month. We will ask for proof of identity and may charge a fee should any request be unusually complex or time-consuming.

If you have any specific questions about how Epilepsy Scotland processes your data which are not answered here or you would like to make a complaint about how we have managed your data then please either write, call or email us via the details below.



Mrs Lesslie A Young

Epilepsy Scotland 48 Govan Road Glasgow G51 1JL

Tel: 0141 427 4911 or email us at <a href="mailto:contact@epilepsyscotland.org.uk">contact@epilepsyscotland.org.uk</a>.

If you are not satisfied with our response to your enquiry, then you can contact the Information Commissioner's Office directly via the details on their website.

# Changes to this policy

Our Privacy Policy may change from time to time. The amended version will be published on our website and any significant changes will be communicated to supporters either on the website or directly.

This will replace any previous privacy policy wording and all conditions and terms of use will be in force from the date of publication.

Last updated: 05 June 2020

For personal information enquiries:

Attention: Data Controller

Email: contact@epilepsyscotland.org.uk

Phone: 0141 427 4911

Address: Epilepsy Scotland

48 Govan Road

Glasgow G51 1JL