



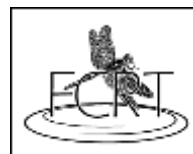
## Flow Country Rivers Trust: Data Handling Policy

1. The Flow Country Rivers Trust (FCRT) in pursuance of its charitable objectives [i] has a requirement to process a small quantity of personal data. As a Data Controller under the General Data Protection Regulation (GDPR) which comes into effect on 25 May 2018 the Trust will comply with the following six principles for the handling of personal data, namely that data must be: -
  - fairly and lawfully processed
  - processed for limited purposes
  - adequate and relevant and limited to what is necessary
  - accurate and where necessary up to date
  - not kept in a way that people can be identified from it for longer than is necessary
  - processed in a way that ensures appropriate security.
2. The Directors/Trustees are responsible for ensuring compliance with the GDPR. The FCRT is registered with Information Commissioner's Office, Reference No ZA088439, and the Secretary to the Trust is the appointed Data Protection Officer.
3. Personal information collected and held will be confined to names and contact details of individuals. The types of records held by the FCRT and their purpose are listed below, together with the legal basis for holding this data within the meaning of the GDPR.

| Database                      | Purpose                                     | Legal basis for data |
|-------------------------------|---------------------------------------------|----------------------|
| Trustees                      | Management and accountability               | Legitimate Interests |
| Friends and benefactors       | Dissemination of news, events & activities  | Consent              |
| Gift Aiders                   | Reclaiming tax on subscriptions & donations | Consent              |
| Project Partners              | Planning & undertaking initiatives          | Legitimate Interests |
| Suppliers of goods & services | Financial transactions and accounting       | Contract             |
| Receivers of services         | Provision of support & education            | Legitimate interests |

4. The Trust will audit its information annually to ensure that its databases are compliant with the six principles of GDPR. In particular, the audit will ensure that:
  - individuals have given their consent for their contact information to be held
  - records are up to date and accurate
  - there is still a legitimate requirement to hold data
  - no more data is held than is necessary
  - data will only be held for so long as is needed

A log will be maintained by the Secretary to confirm when the audit has taken place and to certify that databases comply with the GDPR.
5. The Trust will not share the personal data of any individual with any third party, other than HMRC in respect of gift aid claims and following completion of the relevant declaration. On rare occasions when it would be expedient to put individuals in contact with one another in order to progress Trust activities express permission will be requested from the individual(s) concerned before proceeding.
6. The Trust will ensure that all personal data held (physical as well as electronic) is securely stored and securely disposed of when no longer required.
7. The Trust will respond within 28 days to any written request (including by e-mail) by a data subject for details of information held by the Trust on them. Individuals have a right to complain to the Information Commissioner's Office if they are not satisfied with the way their data is handled.



8. The Trust will publish a Privacy notice on its website, to be reviewed at least once a year to coincide with the annual audit of database records.
9. When personal data is collected from individuals the Trust will provide them with key information, including FCRT contact details, the purpose for which the information is being held, the lawful basis of processing and the period for which the information will be retained. In practice the simplest way of doing this will be to include a note on all communications referring to the Trust's Privacy Statement.

20/5/18

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- [i] The aims of the FCRT include the promotion and support of initiatives that seek to further the protection of all freshwater species of fish, migratory or otherwise, within the Flow Country of Caithness and eastern Sutherland, together with the flora and fauna associated with the rivers and still waters.