

# Dalkeith CAB

## Privacy Policy for Volunteer members of the Board of Trustees/Directors



### 1. Introduction

- 1.1 Under the General Data Protection Regulation (GDPR) and the Data Protection Act 2018, you have a right to be informed about the collection and use of your personal data. This notice sets out your rights and provides you with the information that you need to exercise those rights.
- 1.2 We will provide data privacy information to you at the time that we collect your personal data from you and within one month if we obtain personal data from other sources.
- 1.3 We will regularly review and where necessary update your data privacy information. If we start to use your information for a new purpose which you are/were not aware of, we will bring this to your attention before we begin processing it.
- 1.4 We will provide the information in a way that is concise, transparent, intelligible, easily accessible and uses clear and plain language.

### 2. The lawful basis for processing your personal data

- 2.1 Dalkeith & District Citizens Advice Bureau (CAB) needs to keep and process information about you. The information we hold and process will be used for our management and administration only. We will keep and use it to enable us to run the bureau and manage our relationship with you effectively, lawfully and appropriately, during the volunteer recruitment process, while you are volunteering with us, at the time when you leave and after you have left.
- 2.2 This includes using information to enable us to comply with any legal requirements, pursue the "legitimate interests of the bureau (for example, to prevent fraud, for administrative purposes or to report potential crimes,) and protect our legal position in the event of legal proceedings.

### 3. Purpose of processing your personal data

- 3.1 Much of the information that we hold will have been provided by you, but some may come from other external sources such as referees, Companies House or Disclosure Scotland.

- 3.2** The sort of information we hold includes your application form and references, your declaration of interest form, OSCR Trustee Declaration form, Companies House Appointment form, correspondence with or about you, information needed to reimburse your expenses, contact and emergency contact details, information needed for equal opportunities monitoring, information needed for auditing under the National Standards for Information and Advice Providers, and records relating to your service on the board like records of training or attendance at conferences.
- 3.3** Where necessary, we may keep information relating to your health. This information will be used in order to comply with our health and safety and occupational health obligations – to consider how your health affects your ability to serve as a Trustee and whether any adjustments to the role may be appropriate. This information may also be required for insurance related policies.
- 3.4** Where we process special categories of sensitive personal data relating to your race, ethnic origin, political opinions, religion, trade union membership, genetics, biometric data, health, sex life or sexual orientation, we will always obtain your explicit consent to those activities unless this is not required by the law or the information is needed to protect your health in an emergency
- 3.5** Where we are processing data based on your consent, you have the right to withdraw that consent at any time.
- 4. Retention periods for your personal data.** We will keep your records for the following periods:
- 4.1** Trustee information files and training records – 7 years after you cease serving as a Trustee for the CAB.
- 4.2** Application forms and interview notes – 1 year after the interview.
- 4.3** Disclosure Scotland checks (if applicable) – 6 years after you stop being a Trustee.
- 4.4** Health records – during the time you are a Trustee for the CAB.
- 4.5** References received – 1 year after the CAB receives these.
- 4.6** Trustee induction notes – 3 months after you stop being a Trustee.
- 4.7** References given by the CAB for you, and information to enable references to be provided – 5 years after you stop being a CAB Trustee.
- 4.8** Records related to accidents or injuries incurred while you are a trustee for the CAB – 12 years.

## **5. Who your information will be shared with.**

### **5.1 Data will be shared with the following agencies**

- 5.1.1** The Bank for purposes of administering expenses payments.
- 5.1.2** The auditors for the National Standards for Information and Advice Providers in order to provide proof of competence against those standards. Currently the organisation responsible for audit is the Scottish Legal Aid Board
- 5.1.3** Citizens Advice Scotland for the purposes of audit, complaints handling and support with HR issues (in order to comply with SACAB membership conditions)
- 5.1.4** Office of the Scottish Charity Regulator (OSCR) for the purposes of adhering to requirements of the Charities and Trustee Investment Act 2005.
- 5.1.5** Companies House for the purpose of adhering to requirements of the Companies Act 2006.

### **5.2 Other than for the purposes outlined above, we will only disclose information about you to third parties if we are legally obliged to do so.**

## **6. Your rights in relation to the processing of your personal information**

- 6.1** Under the General Data Protection Regulation (GDPR) and the Data Protection Act (DPA) 2018, you have a number of rights with regard to your personal data. You have the right to request from us access to and rectification or erasure of your personal data; the right to restrict processing or to object to processing; and (in some circumstances) the right to data portability.
- 6.2** If you have provided consent for the processing of your data, you have the right (in certain circumstances) to withdraw that consent at any time, which will not affect the lawfulness of the processing before your consent is withdrawn.
- 6.3** You have the right to make a complaint to the Information Commissioners Office if you believe that we have not complied with the requirements of the GDPR or the DPA.

## **7. Identity and contact details of the data controller and the data protection officer**

- 7.1** Dalkeith & District Citizens Advice Bureau is the controller and processor of data for the purposes of the GDPR and the DPA 2018.
- 7.2** If you have any concerns about how your data is processed you can the CAB Manager at the address at the bottom of the first page of this document.