

SCOTTISH COMMUNITY DRAMA ASSOCIATION

SC021397

PRIVACY POLICY

May 2018

The data we need

Scottish Community Drama Association (SCDA) is a “controller” of the personal information that you provide to us.

Members Personal Data

When you register as a member of SCDA or renew your membership for yourself (or on behalf of another person) we may ask you for all or some of the following personal information:

- Contact details – name, address, email address
- Membership category – e.g. Youth, Full time student, Adult, Joint, etc.
- For Clubs only – in numbers only, disability, age categories, etc.
- For Clubs only – PVG contact details and insurance cover

Why we need your personal information – Contractual Purposes:

We need our member’s personal information so that we can manage your membership.

We will use our member’s personal information to:

- Provide you with core member services
- Send you membership communications by post or email in relation to essential membership services including, but not limited to, general meeting notices, communications from National Committee and HQ, membership renewals, membership fee information, etc.

If you do not provide us with all the personal information that we need to collect then this may affect our ability to offer the above membership services and benefits.

Why we need your personal information – Legitimate Purposes:

We also process our member’s personal information in pursuit of our legitimate interests to:

- Promote events including competitions. Our events and competitions may be filmed or photographed and your personal information may also be used in images captured from our competitions and events, which we use for promotional, educational and development purposes.
- Develop and maintain member’s qualifications by sending details of training opportunities etc. in connection with PVG and other relevant legislation.

- Respond to and communicate with members regarding your questions, comments, complaints, concerns in relation to SCDA or community drama in general.
- Where we process your personal information in pursuit of our legitimate interest you have the right to object to our using your personal information for the above purposes. If you wish to object to any of the above processing please contact us by email to headquarters@scda.org.uk or in writing to our office *Suite 88, STEP, Stirling, FK7 8RP*.

Volunteers Personal Data

We will need to collect personal information relating to criminal convictions or alleged commission of criminal offences where you are required to complete a PVG check under the Protection of Vulnerable Groups (Scotland) Act 2007. This information will include your PVG certificate number, PVG membership number, date of issue and any relevant information in relation to your membership of the PVG Scheme.

If your PVG certificate is not clear, we will have a legitimate interest to collect references and any other applicable information to allow us to consider whether or not you can volunteer in a regulated role with children and/or vulnerable adults.

Where we process your personal information in pursuit of our legitimate interests, you have the right to object to us using your personal information for the above purposes. If you wish to object to any of the above processing, please contact us by email to headquarters@scda.org.uk or in writing to our office *Suite 88, STEP, Stirling, FK7 8RP*.

If we comply with your objection, this may affect our ability to undertake the tasks above for the benefit of you as a volunteer.

Why we need your personal information – legal obligations:

- The Protection of Vulnerable Groups (Scotland) Act 2007 requires us to check that our volunteers are legally able to undertake regulated work with children and vulnerable adults where part of their remit.
- The Equality Act 2010, which requires us to process personal information to make reasonable adjustments where necessary;

Other uses of your personal information

We may ask you if we can process your personal information for additional purposes. Where we do so, we will provide you with an additional privacy notice with information on how we will use your information for these additional purposes.

Who we share your personal information with:

If your personal information is included in any images or videos taken by us at our competitions and events, we may share this with third parties for promotional and/or journalistic purposes.

We may be required to share personal information with statutory or regulatory authorities and organisations to comply with statutory obligations. Such organisations include the Health & Safety Executive, Disclosure Scotland, and Police Scotland for the purposes of safeguarding children and vulnerable adults.

We may also share personal information with our professional and legal advisors for the purposes of taking advice.

SCDA employs third party suppliers to provide services, including IT, payroll, etc. These suppliers may process personal information on our behalf as “processors” and are subject to written contractual conditions to only process that personal information under our instructions and protect it.

In the event that we do share personal information with external third parties, we will only share such personal information strictly required for the specific purposes and take reasonable steps to ensure that recipients shall only process the disclosed personal information in accordance with those purposes.

SCDA do not sell your personal data to third parties under any circumstances, or permit third parties to sell on the data we have shared with them.

Participants’ Personal Data

We publish the results of our competitions on our website, in our in-house magazine, Scene, and in our newsletters and may send them to third parties such as newspapers etc. This may include competitors’ names.

How we protect your personal information:

Your personal information is stored securely in paper form, and also on our electronic filing systems and our servers based in the UK / EU, and is accessed by our staff and volunteers for the purposes set out above.

We may use MailChimp from time to time to send our email communications. We understand that MailChimp’s servers are based in the US but have signed up to the “Privacy Shield”, which is an agreement between the US and EU Commission relating to the protection of personal data – this constitutes a “safeguard” under the GDPR.

How long we keep your personal information:

Members’ personal data

We will keep your personal information for as long as necessary to provide you with membership services. If you choose not to renew your membership with us we will still keep certain personal information of ex-members for longer in order to comply with legislation relating to the retention of accounting records.

Legitimate Interests

In addition to the foregoing we also use email data for the purpose of direct marketing. The lawful basis that we use for this processing is “Legitimate Interest”. This is covered in the GDPR. The

Information Commissioners Office (ICO) recommend that organisations using this basis conduct a “Legitimate Interests Assessment” (LIA) and we have done this. Our direct marketing is limited to our own branded merchandise, drama related workshops, events, competitions, etc.

Your rights

You can exercise any of the following rights by writing to us at *Suite 88, STEP, Stirling, FK7 7RP* or by emailing headquarters@scda.org.uk

Your rights in relation to your personal information are:

- you have a right to request access to the personal information that we hold about you by making a “subject access request”;
- if you believe that any of your personal information is inaccurate or incomplete, you have a right to request that we correct or complete your personal information;
- you have a right to request that we restrict the processing of your personal information for specific purposes; and
- if you wish us to delete your personal information, you may request that we do so.

Any requests received by SCDA will be considered under applicable data protection legislation. If you remain dissatisfied, you have a right to raise a complaint with the Information Commissioner’s Office at www.ico.org.uk