**Privacy Policy Statement**

Befrienders SCIO undertakes to respect and protect the personal information (data) you have provided us with, or that we have acquired from other organisations, and to keep it safe. We are committed to collecting the minimum amount of information needed and holding this information only when it is required. For the purposes of GDPR we are the controllers and processors of the data.

This policy will outline what kinds of data we collect, why we collect it, how we will use, share, and store it, what your rights are, and how you can contact us to manage, edit or delete this information.  You can contact us regarding your personal data or information, or to request a printed (or large print) copy of this privacy policy using the contact details below:

**Telephone: 01546 603 144**

**Address:  Befrienders SCIO, PO Box 9576, Lochgilphead, ARGYLL PA31 9BB**

**Email: info@befrienders.scot**

**Who are we?**

Befrienders SCIO is a local independent charity (Charity No.SC047812). We recruit, train and support adult volunteers who act as Befrienders for children and young people aged 6-16.

**When do we collect information?**

We collect information about you when you are referred to us by another organisation with your consent. We also record brief details of any further contact we have with you e.g. calls and visits made by us or you as part of our ongoing support for you, attendance at events and activities and information from other services which is provided to us to help us support you as fully as possible.

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If you are a paid employee or volunteer with us, then we will obtain and retain information about you from your recruitment application. If you are in paid employment with us, or receive a travel or subsistence allowance as a volunteer, we will collect your financial information (bank account details).

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If you are a donor, we will collect financial information (direct debit/standing order details), and whether your donations are gift-aided.

**What kind of information do we collect and why?**

If you are client, Befrienders SCIO may collect different types of personal data directly from or about you, depending on the activities or services we are offering and that you are taking part in or using.  This can include your name, address, telephone number, email, date of birth, data relating to your personal and caring situations, religion, medical data (if pertinent to the activities or services), and some financial data if necessary to support you with finances such as accessing grants etc.

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We may collect or store information relating to your health. This information will only be held with your explicit consent and we will take extra care to ensure your privacy rights are protected.

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We collect information about you or your child in order to:

* provide information, advice and support to you or your child
* seek your views or comments on the services we provide
* notify you of changes to our service
* inform our future service development and improve our service
* provide anonymised monitoring information to our service commissioners and funders, to demonstrate the usage and efficacy of our services
* send you details about upcoming activities, relevant news and information
* respond to general and specific enquiries

If you are an employee or volunteer, we may collect name, address, date of birth, employment history, references, disclosure, professional certificates, details of emergency contacts, medical conditions. For paid employees we will collect and retain records relating to your ongoing employment with us.

**Our Website**

We do not use cookies or collect user data from our website ([www.befrienders.scot](http://www.befrienders.scot)), other than site traffic data collected in aggregate which does not include any personal information. If you use our online contact form, the details you input will be sent to us via email. We will use the contact email and information you supply to respond to your enquiry, but we will not use your details for unsolicited contact.

Our website may contain hyperlinks to some other websites. We are not responsible for the content or functionality of any of those external websites, but please let us know if a link is not working by using the 'Contact' link at the top of the page.

If an external website requests personal information from you the information you provide will not be covered by Befrienders SCIO Privacy Policy. We suggest you read the privacy policy of any website before providing any personal information.

**How do we protect your information?**

We employ a variety of physical and technical measures to keep your data safe and to prevent unauthorised access to, use or disclosure of your personal information.

Electronic data is stored on secure computer systems and we control who has access to information (using both physical and electronic means). Paper files are kept in a locked filing cabinet and only staff members have access to these.

Our staff receive data protection training and we have a set of detailed data protection procedures which personnel are required to follow when handling personal data. This includes PVG scheme certificates and staff/volunteer references.

**When will we share information about you?**

We will never sell your personal data and will only ever share it with organisations we work with where necessary and if its privacy and security are guaranteed. This could include sharing data with third party organisations who provide a service to us and are acting as data processors, for example, to administer payroll services, and partners who support us in the delivery of services to you or your child. We will undertake due diligence and will require these organisations to comply strictly with our instructions as well as data protection policies and legislation.  We regularly monitor all our data processors.

If you request that we refer you/your child to a third-party organisation we will only undertake this with your permission.

We may also share your data in the following circumstances:

* Where we must comply with laws such as those for national security, taxation, or criminal investigations.
* Where we must undertake due diligence, to be sure we are not being used as a channel for criminal activities.

**Disclosure**

Befrienders SCIO has a legal duty to disclose some information:

* Safeguarding concerns will be reported to Argyll and Bute Social Services.
* Drug trafficking, money laundering, acts of terrorism or treason will be disclosed to Police Scotland.
* In addition, colleagues believing an illegal act has taken place will be required to report this to their line manager who will report it to the appropriate authorities.

We will always inform you of any disclosure.

**Legal grounds and Legitimate Interest**

When you contact us for information, advice or support, you are engaging with us in an agreement for the provision of those agreed services (known as a ‘contract’ for lawful processing).

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When we collect and use your personal information, we will make sure this is only done in accordance with at least one of the legal bases available to us under the General Data Protection Regulations.

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In all cases, we balance our legitimate interests against your rights as an individual and make sure we only use personal information in a way or for a purpose that you would reasonably expect and that does not intrude on your privacy or previously expressed marketing preferences.

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Where we process sensitive personal data, we will make sure that we only do so in accordance with one of the additional lawful grounds for processing such as where we have your explicit consent, or you have made that information manifestly public. When we do this, we will tell you what sensitive personal data we are collecting and why.

**Marketing**

If you provide your consent to us we may contact you for marketing purposes by post, telephone, email or text message. By opting into communication from Befrienders SCIO you grant us the right to use the communication methods you have indicated for the marketing purposes for which you give explicit consent such as inviting you to take part in consultations and for feedback to funders.

It is always your choice as to whether you want to receive information about our work, how we raise funds and the ways you can get involved. You can change any of your contact preferences or opt-out of our marketing communications all together. We will not use your personal information for marketing purposes if you have indicated that you do not wish to be contacted by us for such purposes. To change your marketing preferences contact us using the one of the contact methods below:

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**Email: info@befrienders.org.uk**

**Privacy and young and/or vulnerable people**

This privacy policy applies to everyone, including those who are considered to be vulnerable, young people and children. To access our service or provide any personal data to us, young people under the age of 13 must have permission or consent of a parent or guardian.  Befrienders SCIO will seek such consent where necessary.

**How long will we hold your information?**

We will only hold this data for as long as it is necessary for the purposes for which it is provided to us.  We will dispose of unnecessary personal data using secure deletion methods (electronic) or shredding.  We will contact you periodically (at least every 4 years) to confirm that the data we hold about you or your child is accurate and up-to-date and that we may continue to contact you.  We will then update our records accordingly.

We may aggregate and anonymise personal data so that it can no longer be linked to any particular person. This information can be used for a variety of purposes, such as reporting to funders and identifying trends to help inform our actions and improve our services.

**How can you manage or delete the information we have about you?**

Your rights regarding the data we hold and collect about you or your child are outlined in the data protection policies and legislation of the United Kingdom and, from 25 May 2018, the European Union.  These include: the right to access, edit and update, request the deletion of, and restrict the processing of your personal information, the right to object to the collection of your personal data and the right to lodge a complaint with a supervisory authority about your personal information.  If you would like to find out what personal information/data we hold about you, delete any of this data, (e.g. remove your name from any of our mailing lists), update your communication preferences or if you have any questions or comments about this Privacy Policy please contact us.

If you are not satisfied with our response or believe that we are not processing your personal data in accordance with the law you can complain to the Information Commissioner’s Office (ICO).  You can contact the ICO on:

Telephone: 0303 123 1113

Address:   Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF

Email:   [registration@ico.org.uk](mailto:registration@ico.org.uk)

**Changes in our Privacy Policy**

We will notify you through a notice on our website, or in some cases directly by your preferred form of communication, of any significant changes to this Privacy Policy.  This notice will be clearly highlighted on our website ([www.befrienders.scot](http://www.befrienders.scot)) for one month after the changes have been made.  The effective date of each update will be displayed at the beginning of this statement.

This Privacy Policy will be reviewed annually, and Befrienders SCIO reserves the right to modify this statement at any time.