

# **INTRODUCTION**

Welcome to the Bank of Scotland Foundation's website privacy notice.

Bank of Scotland Foundation is an independent charity working with charities across Scotland supporting people and their local communities.

The Bank of Scotland Foundation respects your privacy and is committed to protecting your personal data. This privacy notice will inform you as to how we look after your personal data when you visit our website (regardless of where you visit it from) and tell you about your privacy rights and how the law protects you.

You can download a pdf version of the policy [here](#).

## **IMPORTANT INFORMATION**

### **PERSONAL DATA**

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We do not collect any Special Categories of Personal Data about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health, and genetic and biometric data) nor do we collect any information about criminal convictions and offences.

### **PURPOSE OF THIS PRIVACY NOTICE**

This privacy notice aims to give you information on how the Bank of Scotland Foundation collects and processes your personal data through your use of this website.

If you are a grant applicant, please consult our Grants Privacy Notice when you are applying for a grant through our online application process found at: <https://secure.bankofscotlandfoundation.org>.

If you are a Matched Giving applicant, please consult our Matched Giving Privacy Notice which is held on the Lloyds Banking Group Interchange site for Lloyds Banking Group Employees. Please note the Bank of Scotland

Foundation Matched Giving Scheme is only open to Lloyds Banking Group Employees based in Scotland.

Please note, more than one privacy notice might apply to you. It is important that you read this privacy notice together with any other privacy notices we make available to you so that you are fully aware of how and why we are using your data. This privacy notice supplements other privacy notices and is not intended to override them.

This website is not intended for children and we do not knowingly collect data relating to children.

## DATA CONTROLLER AND CONTACTING US

Bank of Scotland Foundation (a private company limited by guarantee with Company Number SC229825) is the data controller and responsible for your personal data (collectively referred to as “BoS Foundation”, “we”, “us” or “our” in this privacy notice).

If you have any questions about this privacy notice, including any requests to exercise your legal rights, please contact us at using the details set out below:

Email address: [enquiries@bankofscotlandfoundation.co.uk](mailto:enquiries@bankofscotlandfoundation.co.uk)  
Postal address: The Mound, Edinburgh, EH1 1YZ  
Telephone number: 0345 124 1351

## CHANGES TO THE PRIVACY NOTICE

We keep our privacy policy under regular review. This version was last updated on 22 April 2021.

## THIRD-PARTY LINKS

This website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements.

When you leave our website, we encourage you to read the privacy notice of every website you visit.

## COMPLAINTS

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues ([www.ico.org.uk](http://www.ico.org.uk)).

We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

## HOW WE USE YOUR DATA

### THE DATA WE COLLECT

If you contact us using the details provided on our website, we may collect your personal data including first name, last name, title, address, email address and/or telephone numbers.

For statistical purposes , we may collect feedback from you if you have attended our events or if your charity has received from us. This feedback will be anonymous unless you specify otherwise.

We also collect, use and share **Aggregated Data** such as bandwidth use. Aggregated Data may be derived from your personal data but is not considered personal data in law as this data does not directly or indirectly reveal your identity. For example, our website provider may aggregate bandwidth use so that we can consider the performance of our website.

We do not collect any other technical data or personal data from your use of our website.

### YOUR DUTY TO INFORM US OF CHANGES

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

### HOW WE COLLECT YOUR DATA

We only collect data from you from **Direct Interactions** if you contact us using the details provided on our website, correspond with us by post, phone, email or otherwise, register to attend an event we are hosting, or provide us with feedback.

## HOW WE USE YOUR DATA

We will only use your personal data as permitted by law. We will use your personal data to:

- give you information relating to our Foundation and to process and respond to any queries you raise with us,
- manage your attendance when you register for our virtual events, including creating social media posts and making recordings of the events available on our website, and
- analyze and respond to feedback you provide to us.

## HOW WE SHARE YOUR DATA

We may share your personal data with the parties set out below:

- **Service providers** who provide us with IT and system administration services.
- **DRPG** who manage and administer events on our behalf. (You can access their privacy policy by clicking [here](#).)
- **Professional advisers** including lawyers, bankers, auditors and insurers based in consultancy, banking, legal, insurance and accounting services.
- **Law enforcement agencies, regulators and other authorities and government bodies** who require reporting of processing activities in certain circumstances.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

We do not transfer your personal data outside the European Economic Area (EEA).

## HOW LONG WE KEEP YOUR DATA

We will retain your personal data for as long as required to give you information relating to our Foundation and to process and respond to any queries you raise with us.

If we host a virtual event, the event will be recorded and shared on our website and on our social media channels. Our copy of the recording and

data from the registration site will be deleted no later than 18 months after the date of the event.

In some circumstances, you can ask us to delete your data. See [Request erasure](#) below for further information.

## DATA SECURITY

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed.

In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

## LEGAL RIGHTS

### YOUR LEGAL RIGHTS

Under certain circumstances, you have rights under data protection laws in relation to your personal data. You may have the right to:

**Request access** to your personal data (commonly known as a “data subject access request”). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.

**Request correction** of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.

**Request erasure** of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed

your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

**Object to processing** of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

**Request restriction of processing** of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

**Request the transfer** of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

**Withdraw consent at any time** where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

## EXERCISING YOUR LEGAL RIGHTS

If you wish to exercise any of the rights set out above, please [Contact us](#).

You will not have to pay a fee to exercise any of the other rights. However, we may charge a reasonable fee if your request is clearly unfounded,

repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.