



## PRIVACY NOTICE FOR MEMBERS, FRIENDS AND DONORS

*Last updated February 2019*

SuperTroop (“We”) are committed to protecting and respecting your privacy and the privacy of your children. We will not collect any information about individuals, except where it is specifically and knowingly provided by them, or in the case of children, their parents or carers.

This statement sets out the basis on which any personal data that you provide to us will be processed by us. Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it.

For the purpose of the General Data Protection Regulation (GDPR) 2016/679, the data controller is SuperTroop . Registered charity number is SC047109 and registered address is 28 Shandon Crescent, Edinburgh, EH11 1QF

### **Who are we?**

We are an Edinburgh based charity who provide residential summer breaks for children and young people with disabilities. Our goal is to provide excellent holidays, creating an environment in which holiday makers feel surrounded by peers and friends. To achieve this, we work with a youthful team of volunteers recruited from Fettes College - the school hosted our first holiday in July 2018.

### **How do we collect information from you?**

SuperTroop may collect personal information from you via an online form (e.g. Survey Monkey) and through email. In some cases information will be collected in person. Where we collect data through Survey Monkey, it will be a processor of your data.

If you donate via JustGiving or another platform (e.g. Charities Aid Foundation), that organisation may also collect information about you that they then pass to us, provided you have given permission for them to do so.

### **What type of information is collected from you?**

SuperTroop will collect only necessary personal information from you. This may include but is not limited to:

- name
- email address
- mailing address
- phone numbers

### **How is your information used?**

SuperTroop maintains strict policies to avoid unsolicited correspondence and we do not sell or share any information about individual users.

We only use the personal information we hold in relation to you for the purpose of keeping you up to date with the activities of the charity, including fundraising campaigns and events.

This information is shared with SuperTroop staff and volunteers who are involved in running the charity. We store information in password-protected files in a digital file-sharing service, such as Dropbox. This system means that all the people who need it have access to accurate, up-to-date information and we minimise circulation of information via email and other potentially-insecure services.



We may also share personal information where we are legally obliged to do so. An example of this would be an audit of SuperTroop by the Office of the Scottish Charity Regulator (OSCR).

We review our retention periods for personal information on a regular basis. We are legally required to hold some types of information to fulfil our statutory obligations. We will hold your personal information on our systems for as long as is necessary for the relevant activity, or as long as is set out in any relevant contract you hold with us. You may request a copy of our data retention policy using the postal address above.

### **Cookies**

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On our website, SuperTroop employs "cookies" to provide a better service to its users. We do not use cookies to store any personally identifying information from users except to identify a user who has chosen to log in to the site. We do not use cookies to track user activities beyond our web site. For example, we use cookies to store your country preference. This helps us to improve our website and deliver a better more personalised service.

It is possible to switch off cookies by setting your browser preferences. For more information on how to switch off cookies on your computer, visit our full cookies policy. Turning cookies off may result in a loss of functionality when using our website.

### **Your Rights**

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In addition to the company's safeguards, your personal data is protected in the UK by the General Data Protection Regulation (GDPR). You can find more information about your rights [www.ico.org.uk](http://www.ico.org.uk). This is the website of the Information Commissioner's Office. The Information Commissioner is the regulator for data protection in the United Kingdom.

GDPR provides amongst other things that the data we hold about you should be processed lawfully and fairly. It should be accurate, relevant and not excessive. We will endeavour to keep the information you provide up to date, where required, and not retained for longer than is necessary. It will be kept securely to prevent unauthorised access by other people. If you have concerns about the processing of your personal data by SuperTroop you may contact us at [sue@supertroop.org](mailto:sue@supertroop.org). If you find any inaccuracies with the personal data we retain, we will delete or correct them promptly.

We will not use your data for marketing purposes and we will not use such data for publicity without your consent.

### **Right to Access Your Information**

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The General Data Protection Regulation (GDPR) gives you the right to access any information held about you. You can assert this right at any time. We will provide a copy of your information, free of charge. However, we do reserve the right to charge a 'reasonable fee' when a request is manifestly unfounded or excessive, particularly if it is repetitive. We also reserve the right to charge a reasonable fee to comply with further copies of the same information. Any fee will be based on the administrative cost of providing the information. We will endeavour to supply this information without delay and at the latest within one month of receipt. If the request is complex or numerous we can extend this period by a further two months. You will be informed, if this is the case, within one month of the request with an explanation as to why it is necessary.

### **16 or Under**

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We are committed to protecting the privacy of children aged 16 or under. If you are aged 16 or under, please get your parent/guardian's permission before you provide us with any personal information.



*Residential breaks for youth with learning disabilities*

[www.supertroop.org](http://www.supertroop.org)

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### **Policy Changes**

SuperTroop's Privacy Policy can be found on our website. Any changes to the Policy will be publicized on our website and we will also let you know about any significant changes directly.