

Street Fit Scotland

Privacy Policy

Street Fit Scotland respects your privacy and is committed to protecting your personal information. This privacy policy will inform you as to how we look after your personal information. This notice explains what personal information we hold about you, how we collect it, how we process it and how we use and may share information about you. Please ensure that you read this policy and any other similar policy we may provide to you from time to time when we collect or process personal information about you.

Who collects the information?

Street Fit Scotland is the 'data controller' in connection with this policy and gathers and uses certain information about you. Where Street Fit Scotland is also a 'data processor', we will process information received from third parties about you.

How do we collect and use personal information

We collect information about you direct whenever you interact with us. This includes when you:

- Fill in forms or by correspond with us by post, phone, email or otherwise
- Visit our website
- Enquire about our services
- Receive a service from Street Fit Scotland
- Register with us or subscribe to our online content or take any of our online surveys
- Engage with us via social media
- Make a complaint
- Donate to, or fundraise for Street Fit Scotland

We may also receive information about you when:

- You interact with third parties that we work with
- Via independent event organisers of fundraising sites. This will be highlighted at the time of interaction where you will have indicated that you wish to support Street Fit Scotland and you have given your consent for your information to be shared
- You give permission to other organisations to share your information
- Information is publicly available

We also use cookies on our website to collect information about how our visitors are using our website to improve the content and to make it more user friendly. You can choose not to accept cookies but this could make the website more difficult to navigate.

How will we use that information?

We may use your information to:

- Provide services, advice or information you have asked for.
- Improve our services or our internal processes.
- Invite you to participate in voluntary surveys or research.
- Analyse and improve the content and operation of our website.
- Perform the contract we are about to enter into or have entered into with you.

- Provide you with information about our plans which may include information about surveys, training, services, policy initiatives, fundraising initiatives, if you have given consent.
- Help us to ensure that our communications to you are relevant.
- Undertake analysis and statistical reporting.
- Keep a record of your relationship with us and to keep your information up to date and accurate.
- Administer your donation, support your fundraising and/or process gift aid.
- Send you fundraising updates and appeals we think you might be interested in if you have given your consent.
- Organise our data to help us target our resources more effectively and to provide an improved experience to people who choose to support us.
- Comply with a legal obligation.
- Providing support to counselling services (with your consent only).
- Participate in “track and trace” required activities to reduce the spread of Covid-19.

We will only use your personal information for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us.

If we need to use your personal information for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal information without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

About the information we collect and hold and when we may share your information

We use your personal information to provide you with the best possible service and will only use your personal information when the law allows us to. The personal information we collect and how we use it will depend on how you interact with us.

The table set out on the following pages, appendix 1, summarises the information we collect and hold, how and why we do so. Details on how we use it and with whom it may be shared can be found in appendix 2.

We ensure that all information sharing is done securely, and that it is proportionate. This means that we share only the minimum amount of personal information required, and only with those that need to have access.

In delivering our services Street Fit Scotland will normally only share personal information with another agency/organisation with your consent, such as other, Voluntary Organisations, Edinburgh Council and/or Police Scotland.

There are exceptional circumstances where we may have to disclose personal information without your knowledge or consent. These are:

- If we believe that either you or someone else is at risk of significant harm. Street Fit Scotland staff has a duty to report any issues relating to child protection or adult safeguarding.
- Where there is another legal reason or requirement to disclose your personal information.

We will notify you of any changes to information we collect or to the purposes for which we collect and process it.

It is important that the personal information we hold about you is accurate and current. Please keep us informed if your personal information changes during your relationship with us. Generally, we do not rely on consent as a legal basis for processing your personal information although we will get your consent before sending third party direct marketing communications to you via email or text message. You have the right to withdraw consent to marketing at any time by contacting us.

How long we keep your information

We will only retain your personal information for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. We may retain your personal information for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

When determining the length of time to hold personal information we will consider the amount, nature, sensitivity of the personal information, the potential risk of harm from unauthorised use or disclosure of your personal information, the purposes for which we process your personal information and the applicable legal requirements.

Your rights to correct and access your information and to ask for it to be erased

You have the right to:

1. Request access to your personal information (commonly known as an “information subject access request”). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.
2. Request correction of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected, though we may need to verify the accuracy of the new information you provide to us.
3. Request erasure of your personal information. This enables you to ask us to delete or remove personal information 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 information 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 information 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.
4. Object to processing of your personal information where we are relying on a legitimate interest (or those of a third party) and there is something about your 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 information 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.
5. Request restriction of processing of your personal information. This enables you to ask us to suspend the processing of your personal information in the following scenarios:
 - a. If you want us to establish the information’s accuracy.
 - b. Where our use of the information is unlawful, but you do not want us to erase it.
 - c. Where you need us to hold the information even if we no longer require it as you need it to establish, exercise or defend legal claims.

To request any of the above please contact Michelle Reilly (details below). We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal information (or to exercise any of your other rights). This is a security measure to ensure that personal information 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.

Keeping your personal information secure

We have put in place appropriate security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal information to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal information 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.

The Street Fit Scotland 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 policy of every website you visit.

How to complain

We have appointed a data protection officer (DPO) who is responsible for overseeing questions in relation to this privacy policy. If you have any questions about this privacy policy, including any requests to exercise your legal rights, please contact the DPO using the details set out below.

If you have any questions about this privacy policy or our privacy practices, please contact our DPO in the following ways:

Full name of DPO: Michelle Reilly, Chief Executive, Street Fit Scotland

Email address: michelle.reilly@streetfitscotland.org

Postal address:

STREET FIT SCOTLAND, 19 South Clerk Street, Edinburgh, EH8 9JD

Telephone number: **0749 669 1911**

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

Changes to this policy

We keep our policy under regular review to ensure that it accurately reflects how we process your information. Any changes will be incorporated into this document and if the changes are significant, we will notify you.

Please look at the last updated date at the top of this policy to see when the latest update was made.

Schedule relating to the information we collect and hold

Appendix 1

The information we collect	How we collect the information	Why we collect the information and how we use it
Your name, address, date of birth, telephone number, e-mail address - (All)	From you or other agencies (as detailed in Appendix 2)	Legitimate interest: To enable us to contact you and keep you updated
General health information (including mental health) and information on any addictions - (Participants, volunteers, employees)	From you	Explicit consent To be able to provide you with tailored support that meets your needs. To ensure you can safely take part in activities
Details of your emergency contact (name, number and relationship to you) - (Participants, volunteers, employees)	From you	Vital interest: To enable us to pass relevant information to Police Scotland should we have the need to report you as a missing person.
Information on referrals we have made to other agencies with your agreement - (Participants, volunteers, employees)	From you	Legitimate interest: To be able to provide you with tailored support that meets your needs.
<p>If it is appropriate we may also collect the following information about you:</p> <ol style="list-style-type: none"> 1. Details about your mental/physical health and well-being if you are sharing your personal experience or taking part in an online survey; or if you are engaging in a physical challenge for fundraising. 2. Details of a sensitive nature about your health and wellbeing to determine which specific services would be best suited to you. 3. Ask why you have chosen to donate to Street Fit Scotland. If you are making a donation we will require your bank/credit/debit card details and taxpayer status for claiming Gift Aid 4. Contact information - includes billing address, delivery address, email address and telephone numbers. 		

5. Usage information including information about how you use our website, products and services.
6. Marketing and communication information including your preferences in receiving marketing from us and our third parties and your communication preferences

We also gather general information about the use of our website (including social media platforms). This might include which pages/platforms are most visited and event information.

Who we may share your information with (Appendix 2)

In providing our services, Street Fit Scotland will normally only share personal information with another agency/organisation with your permission. Agencies that we may need to share information with (to ensure we meet your best interests and support you the best we can) are:

- Edinburgh Council (Housing Officers, Criminal Justice Social Work) any services that are working alongside each other
- NHS Lothian (CPNs)
- Police Scotland
- Edinburgh Leisure
- Any organisation which assists with Street Fit Scotland's counselling services

Where we engage a third party to provide a service on our behalf only required information will be shared. This will be in line with data protection legislation. The third party will hold your information securely and retain it for the period we instruct.

Street Fit Scotland may share your information:

- Where you have chosen to share your story to help further our work and you have given your explicit consent, we may share sensitive information in materials promoting our services or fundraising work or in specific documents.
- In compliance and co-operation with regulatory authorities when we are legally required to do so in accordance with data protection legislation.
- Without consent or knowledge where required to by law.

Version	1.1
Effective from	04/04/2020
Authors	Nina Rogers Quintin Edwards
Approved by Chief Executive and Trustee on	

Name and Signature	Michelle Reilly (Chief Executive)  Nina Rogers (Trustee) 
Designation	SFS community Base/office
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