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**LINK Data Protection Privacy Statement
LINK Members, Supporters and Others**

The privacy of our members, supporter and others whose data we hold is important to LINK. Only information that is collected lawfully, in accordance with the Data Protection Act 1998 and Electronic Communications [EC Directive] Regulations 2003 [“the data protection laws”] is used.

In line with our Registration with the Information Commissioner’s Office we process personal information to enable us to provide a voluntary service for the benefit of the national public as specified in our constitution; administer membership records; to fundraise and promote the interests of the charity; manage our employees and volunteers; maintain our own accounts and records. LINK also interacts with different people and organisations in order to fulfil its remit.

LINK is a data controller for the purposes of the Data Protection Act 1998. The Chief Officer [CO] acts as the designated Data Controller and has overall responsibility for ensuring that the organisation complies with the legislation.

***How we use Data***In order to deliver services and operate the LINK network of NGOs, LINK interacts with different people and organisations to fulfil its remit and these people take on various roles in relation to their LINK network activities, including Group and Subgroup members, campaign members, Conveners and Trustees and contacts across the wider policy community at Scottish, UK and International levels. We recognise that these individuals can be both employees of NGOs and individual volunteers who support the aims of LINK. In addition there is a President and Honorary Fellows who do not directly represent any of the member organisations. For data protection purposes, the personal information of both employees and volunteers is afforded the same protection.

On becoming a member or supporter of LINK, organisations and individuals shall give their permission for LINK to share their contact details with the rest of the LINK membership and other relevant parties engaged in work to enable effective communication across the network and further the aims and objectives of Link. We will also include email addresses on LINK’s distribution lists which will be shared with the wider LINK membership as well as others within the wider policy community.

LINK may also send its members information about third parties’ services [such as courses and conferences] that may be of interest to them.

Personal data is used solely to further the work of the organisation and is not used for any direct marketing purposes. LINK’s electronic databases are held securely, and are regularly reviewed. LINK will not hold or process sensitive classes of information2 on its members or supporters.

 The Data Protection Act (1998) classes names, addresses and contact details as “personal information”.
2Sensitive classes of information includes: Physical or mental health details, Racial or ethnic origin, Religious or other beliefs of a similar nature, Offences and alleged offences, Criminal proceedings, outcomes and sentences

***Information requests***

Members, Supporters and others whose data we hold are entitled to ask, by letter or e-mail, what details of theirs are being held or processed, for what purpose and to whom they have been or may be disclosed. Under the law, LINK can make a nominal charge to cover costs involved in responding to such a request. LINK will respond to such requests within 40 days of receiving such a written request and fee.

Should a member, supporter or other party change their contact details, LINK would appreciate receiving these details as soon as possible so that accurate records can be maintained, in accordance with the law. Equally, should a members and others believe that LINK is using incorrect information then they should contact us as soon as possible so that this can be rectified. Should a member body leave LINK then their details and those of their volunteers and employees will be removed from the LINK email distribution list, but may be held for future information on the LINK outlook database (unless a request is received to be removed).

This privacy statement may change due to developments in the law, so members, supporters and others are encouraged to reread it from time to time so that they are aware of any changes in how LINK gathers and uses personal information.

In addition, LINK has several employees and the use and storage of data for employees are covered in a separate policy *‘Data Protection, LINK and its employees and volunteers’*.

**Note:** The Data Protection Act 1998 came into force on 1 March 2000. Under the Data Protection Act, anyone processing personal information must comply with eight principles of good information handling. The eight principles state that the data must be:

* fairly and lawfully processed; [[1]](#footnote-1)
* processed for limited purposes;[[2]](#footnote-2)
* adequate, relevant and not excessive;[[3]](#footnote-3)
* accurate and up to date;[[4]](#endnote-1)
* not kept longer than necessary;[[5]](#endnote-2)
* processed in accordance with the individual's rights;[[6]](#endnote-3)
* secure;[[7]](#endnote-4)
* not transferred to countries outside the European Economic area, unless there is adequate protection.
1. LINK must have legitimate grounds for collecting and using personal data, not use the data whereby there could be unjustified adverse effects, be transparent about how the data will be used, handle the data within reasonable expectations, and do nothing unlawful with it. [↑](#footnote-ref-1)
2. LINK must be clear as to why the data is being collected and what the intended use is, comply with the Act’s fair processing requirements, and ensure any use of the data that is additional or different to the original purpose be fair. [↑](#footnote-ref-2)
3. LINK must only hold personal data that is sufficient for the intended purpose and not hold more information than is required. [↑](#footnote-ref-3)
4. LINK shall take reasonable steps to ensure accuracy of data, ensure the source is clear, consider any challenges to accuracy of information, and consider whether information must be updated. [↑](#endnote-ref-1)
5. LINK shall review the length data is held, consider how long any data will be retained, securely delete data that is no longer needed, and update, archive or securely delete data that goes out of date. [↑](#endnote-ref-2)
6. Individuals have the right to access of copy of their personal data, object to processing that could cause or is causing damage or distress, prevent processing for direct marketing, object to automated decision making, have inaccurate personal data rectified, blocked, erased or destroyed, claim for damages caused by a breach of the Act. [↑](#endnote-ref-3)
7. LINK must design and organise security to fit the nature of the personal data it holds, be clear who is responsible for ensuring information security, ensure it has the right physical and technical security, and be ready to respond to a security breach quickly and effectively.

For more information visit The Information Commissioner at https://ico.org.uk/ [↑](#endnote-ref-4)