

## **Scottish Cave Rescue Organisation (SCRO)**

### **Privacy Notice for General Business Contacts (version 0.1)**

#### **1. Introduction**

This is the Scottish Cave Rescue Organisation's data handling statement for general business contacts, including contacts in other rescue organisations, contacts in public bodies, suppliers of goods and services and our Independent Accounts Examiner.

We have two separate Privacy Notices for (a) current, former and potential members of SCRO and (b) casualties and other subjects of rescue operations; these are on our website.

If you have any queries about the data relating to you that we hold and process or wish to exercise any of the rights described below in relation to your data, please contact us by email at [data@scro.org.uk](mailto:data@scro.org.uk). Alternatively, please contact The Secretary, Scottish Cave Rescue Organisation, 12 Ashburnham Loan, South Queensferry, EH30 9LF, telephone 0131 331 5205.

#### **2. The Personal Data which we Process**

The personal data relating general business contacts that we may hold and process may include some or all of: -

- Name, address, email address, telephone numbers
- Bank details in the case of suppliers paid by bank transfer

All of this data is collected direct from the data subject; we do not obtain data from third parties. We do not hold or process sensitive "special category" data in relation to general business contacts.

#### **3. Our Purpose and Lawful Basis for Processing your Data**

We hold and process your personal data only to further the charitable purposes for which SCRO is established. These are to provide an underground rescue service in Scotland; to promote safety and good practice in underground exploration; and as requested to assist other emergency and search and rescue services in operations.

The lawful bases for our processing data in respect of general business contacts are: -

- (a) Legitimate Interest: contacts in other organisations and bodies have supplied contact information to us because we wish to communicate about matters of mutual interest, for example over joined-up training or equipment purchases. We do not use such contact details for any unexpected or surprising purposes.
- (b) In the case of suppliers, Contract. We need to hold information about suppliers in order to negotiate, enter into and perform contracts for acquisition of goods and services.

We do not use any personal data in automated decision-making processes.

#### **4. Sharing Data with other Parties**

We may share your data with our IT partners, Expert IT Solutions – who provide our webhosting and other IT services – as data processors only and under a GDPR compliant data processing contract.

We would share contact details of suppliers and other business contacts with other rescue teams and like contacts if making an introduction between the two parties appeared likely to be of mutual interest and benefit to those parties.

We do not and will not sell your personal data to any party. We do not and will not transfer your personal data out-with the European Economic Area.

## **5. Data Retention Periods**

In general, any personal data relating to business contacts will be retained for 5 years from the end of the financial year in which the last communication or transaction with the contact took place. This period may be extended if the data is relevant to any pending court proceedings or dispute resolution process.

In line with HM Revenue and Customs' guidance, data relating to taxation matters requires to be retained for 7 years from the end of the relevant tax year, or longer if it is relevant to a tax investigation.

Further details are given in our [Data Retention Policy](#).

## **6. Your Rights in Relation to Data SCRO hold about You**

Under Data Protection Law, you are entitled to make the follow types of request in relation to the data that we hold about you: -

**Subject access:** the right to request information about how personal data is being processed, including whether personal data is being processed and the right to be allowed access to that data and to be provided with a copy of that data along with the right to obtain the following information:

- the purpose of the processing

- the categories of personal data

- the recipients to whom data has been disclosed or will be disclosed

- the retention period

- the right to lodge a complaint with the Information Commissioner's Office

- the source of the information if not collected direct from the subject, and

- the existence of any automated decision making

**Rectification:** the right to allow a data subject to rectify inaccurate personal data concerning them.

**Erasure:** the right to have data erased and to have confirmation of erasure, but only where:

- the data is no longer necessary in relation to the purpose for which it was collected, or

- where any consent to the processing of the data is withdrawn, or

- where there is no legal basis for the processing, or

- there is a legal obligation to delete data

**Restriction of processing:** the right to ask for certain processing to be restricted in the following circumstances:

if the accuracy of the personal data is being contested, or

if our processing is unlawful but the data subject does not want it erased, or

if the data is no longer needed for the purpose of the processing but it is required by the data subject for the establishment, exercise or defence of legal claims, or

if the data subject has objected to the processing, pending verification of that objection

**Object to processing:** the right to object to the processing of personal data relying on the legitimate interests processing condition unless SCRO can demonstrate compelling legitimate grounds for the processing which override the interests of the data subject or for the establishment, exercise or defence of legal claims.

## **7. Right to lodge a complaint with Supervisory Authority**

For data protection matters, SCRO is subject to the supervisory authority of the UK Information Commissioners' Office ([ico.org.uk](http://ico.org.uk)), to which any complaint may be made.

For matters other than data protection, our regulator is the Office of the Scottish Charity Regulator ([oscr.org.uk](http://oscr.org.uk)).