

Scottish Cave Rescue Organisation (SCRO)

Privacy Notice for Members, Former Members and Potential Members (version 0.1)

1. Introduction

This is the Scottish Cave Rescue Organisation's data handling statement for current, former and potential members of the organisation. 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. 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 current, past and potential members that we may hold and process may include some or all of: -

- Name, address, email address, telephone numbers
- Records of participation in call-outs, exercises and training activities
- Bank details (where expenses payments have been made by bank transfer)
- Gift Aid declarations, where donations have been made under the Gift Aid scheme
- Photographs

All of this data is collected direct from the data subject; we do not obtain data from third parties. We do not currently collect next-of-kin or emergency contact details, but may do so in future. We do not hold or process sensitive "special category" data in relation to current, past or future members.

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 basis for our processing data in respect of current, past and potential members is legitimate interest. SCRO is a voluntary membership organisation. Members understand when joining that the organisation requires to process some personal data- mainly contact details – in order to function, maintain a call-out list for rescue call-outs, arrange effective training and liaison with other search and rescue teams, and to comply with tax laws and report to regulators and funders.

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

4. Sharing Data with other Parties

We 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.

In order to maintain the rescue call-out system, names and mobile phone numbers of current members are shared with and processed by the system provider, SARCALL. It is intended that this will also be regulated by a GDPR compliant data processing contract.

Contact details of office bearers (Management Board Members and Rescue Wardens) are shared with the British Cave Rescue Council (BCRC) and Scottish Mountain Rescue (SMR.) Where practical, we will de-personalise these details by providing reference to the title of the office, not the name of the current holder of that office.

By statute, details of the organisation's Charity Trustees (who are the Management Board Members) and expenses payments made to them require to be included in our annual return to the Office of the Scottish Charities Regulator (OSCR), which is then published by OSCR.

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, personal data relating to members will be retained for 5 years from the end of the financial year in which the individual ceased to be a member of the organisation. This period may be extended if the data is relevant to any pending civil or criminal court proceedings or official inquiry (for example, a fatal accident inquiry.)

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), 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).