SCOTLAND IN UNION PRIVACY POLICY MAY 2018

Scotland in Union prioritise protecting your privacy.

In this Privacy Policy, we set out the ways in which we collect and use your personal information and how you can control this.

SCOTLAND IN UNION

Scotland in Union was established in March 2015 to unite those who want Scotland's future to be firmly within the UK. We have thousands of registered supporters, many of whom volunteer with us. We run online and grassroots campaigns towards this purpose, as well as organising educational and social events and promote these activities through social and mainstream media. We constantly fundraise to ensure that we can resource our work.

We are committed to complying with all relevant data protection legislation including the General Data Protection Regulation (EU) 2016/679 (GDPR) and the Data Protection Act 2018.

We will ensure that the personal information that we hold is processed fairly and transparently, and we will only process personal information that is adequate, relevant and limited to what is required.

We retain your personal information for as long as we maintain a relationship with you. You have the right to request that information is deleted.

If you would like more information on your rights under current data legislation, you can find it at <u>Guidance from the UK Information Commissioner's Office (ICO) on individuals' rights under the General Data Protection Regulation.</u>

Scotland in Union's legitimate interests:

We exist to campaign for Scotland to remain in the UK. We can only do this with the backing of our supporters and donors.

We process your personal information for our legitimate interests after considering any potential impact on you (both positive and negative), and your legal rights. Our legitimate interests do not automatically override your interests. We will not use your personal information for activities where our interests are outweighed by the impact on you, unless we have obtained your consent, or we are required to do so by law.

You have the right to manage your preferences on how we contact you or to unsubscribe from Scotland in Union at any time.

There may be occasions where we have a legitimate interest to continue to process your data even after you have unsubscribed. An example of this would be if you requested for us to stop sending you update emails, then we keep a record of this request in order to ensure that your request is fulfilled.

Registered Supporters

If you register as a supporter, we have a legitimate interest in processing your data and contacting you about our work and campaigns.

We obtain your personal information directly from you when you sign up to become a Scotland in Union registered supporter, either by email or by signing up at a street stall with one of our volunteers.

When you sign up, we ask you for your basic information in order to begin our relationship with you and keep you up-to-date on our activities. We may also obtain your personal information when you use the contact form on our website or email us directly.

We may hold the following types of personal information:

- Name
- Address
- Telephone number
- Email address
- Social media usernames
- IP Address
- Approximate Geographical Location
- List of Scotland in Union events attended
- Record of correspondence between you and Scotland in Union

We may use your personal contact information for the following purposes, including:

- Sending our bimonthly newsletter, The Voice
- Sending campaign updates
- Invitations to events
- Requests for donations
- Invitations to sign petitions or support specific campaigns
- Alerts via social media

Most of the time we use email to contact our supporters, but occasionally we may use other methods. You can update your preferences on how we contact you, or unsubscribe from Scotland in Union, <u>here</u>.

Donors

As a donor to Scotland in Union we have a legitimate interest in processing and retaining your information and to contact you about our fundraising activities and events, either by post or by electronic means. We justify this because our activities are solely funded by donations.

We may hold the following types of personal information:

- Name
- Address
- Telephone number
- Email address
- Record of donations (amounts, dates, type and purpose) to Scotland in Union
- Social media usernames
- IP Address
- Approximate geographical location
- List of Scotland in Union events attended
- Record of correspondence between you and Scotland in Union

We may use your personal contact information for the following purposes, including:

- Sending our bimonthly newsletter, The Voice
- Sending campaign updates
- Invitations to events
- Requests for donations
- Invitations to sign petitions or support specific campaigns
- Alerts via social media

Please note that we may be required to report some donations to the Electoral Commission. You will find further information about this below, and we can provide you with direct advice on this.

Potential Donors and Supporters

Scotland in Union has a legitimate interest in processing and retaining your information about individuals who we understand to be sympathetic to our campaign and to contact you about our fundraising activities and events, either by post or by electronic means. We justify this because our activities are dependent on our supporters and are solely funded by donations.

We may hold the following types of personal information:

- Name
- Address
- Telephone number
- Email address
- Record of donations (amounts, dates, type and purpose) to Scotland in Union
- Social media usernames
- IP Address
- Approximate geographical location
- List of Scotland in Union events attended
- Record of correspondence between you and Scotland in Union

We may use your personal contact information for the following purposes, including:

- Sending our bimonthly newsletter, The Voice
- Sending campaign updates
- Invitations to events
- Requests for donations
- Invitations to sign petitions or support specific campaigns
- Alerts via social media

You have the right to manage your preferences of how we contact you or to request that we delete your information at any time.

Event Attendees

If you register for and/or attend a Scotland in Union event, we have a legitimate interest in retaining your personal information and to contact you about future events by email.

We may hold the following types of personal information:

- Name
- Address
- Telephone number
- Email address
- List of Scotland in Union events attended
- Social media usernames
- IP Address
- Approximate geographical location
- Record of correspondence between you and Scotland in Union

We may use your personal contact information for the following purposes, including:

- Sending our bimonthly newsletter, The Voice
- Sending campaign updates
- Invitations to events
- Requests for donations
- Invitations to sign petitions or support specific campaigns
- Alerts via social media

We have a legitimate interest in inviting people to our events in order to promote our campaigns, carry our work and fundraise.

Website users

Our website is hosted by Wix.com, and we also use NationBuilder to manage data collected on the website.

We use data collection tools (cookies) to monitor user interaction. Cookies are small files that are placed on your computer. This is common to most websites. We use cookies that are necessary for the basic functions of our website or to help improve

its performance for you. You may delete and block all cookies from this site, however this may affect your interaction with parts of the site.

We may collect the following types of personal information:

- IP address
- Approximate geographical location
- Device type (i.e. phone, tablet or PC)
- Internet browser
- Operating system

For more information on cookies, please see our <u>Cookie Policy</u>.

We may also collect the personal information you give us if you sign a petition on our website or complete the contact form.

Articles on our website often contain hyperlinks that lead to other websites. We do not have any control over the contents or actions of any other website, therefore we are not responsible for the protection and privacy of any information which you provide while visiting other sites.

Politicians

From time to time we contact elected members and/or their staff in the process of our work. To do this we use personal information that is publicly available (for example on parliamentary websites or politicians' own websites).

We may hold the following types of personal information, depending on our relationship with you:

- Name
- Address
- Email address
- Contact telephone number
- Social media usernames
- Job title
- Place of employment
- Correspondence between with Scotland in Union
- List of Scotland in Union events attended
- Political affiliation (where this is publicly available)

We may use your personal information for email, telephone and postal direct marketing purposes, including:

- Regular email bulletins
- Press releases or research
- Invitations to sign petitions or join specific campaigns
- Invitations to events
- Alerts via social media
- To discuss a particular policy or issue

- Freedom of Information requests
- To conduct business with you or your employer

Journalists

We also regularly contact members of the media as part of our research and outreach. We obtain personal information from publicly available sources, such as company websites, or when we correspond directly with a member of the media. We may also obtain personal information from a third-party provider.

We may hold the following types of personal information, depending on our relationship with you:

- Name
- Address
- Email address
- Contact telephone number
- Social media usernames
- Job title
- Place of employment
- List of Scotland in Union events attended
- Correspondence with Scotland in Union

We may use this information to contact you to provide press releases or to send invitations to events.

Suppliers

If you do business with us on your own behalf or your employers, we may collect the personal information you provide us with for our accounts and for possible future work.

We may hold the following types of personal information:

- Name
- Address
- Email address
- Contact telephone number
- Job title
- Place of employment
- Bank details (for payments to you)

This information would only be used to in order to conduct our business with you or your employer.

Miscellaneous

We may retain personal information that you provide us when you correspond with us by phone, email or any other method. You can request that we delete this information at any time.

Data processed with your consent

Where we do use consent as our legal basis for processing your data, or process specific categories of your data on the basis of your consent, you have the right to withdraw your consent at any time. This does not affect our right to process your data before you decide to withdraw your consent.

Who we share your personal information with

In order to carry out our work, we share personal information with a number of organisations. Please note that this is solely when it is necessary for us to complete our work and meet all of our obligations. We have not and will never pass on your information for any other purpose.

We share information with the following organisations:

NationBuilder

- NationBuilder is a software platform that we use to store data, including your personal information. It is the industry leader and is secure.
- It is a campaigning tool, and we use it for supporter engagement, and promotion of our work through emailing lists. We will use it for managing your communication preferences.
- If you would like to find out more about how NationBuilder works and uses and protects—your information, please check out the following sites: nationbuilder.com/confidentiality, https://nationbuilder.com/gdpr, and nationbuilder.com/privacy.

G Suite

- G Suite is a cloud computing service we use in order to manage our email and documents.
- Personal information stored securely here includes regular email correspondence, mailing lists, records of some of our donations and documents regarding events (i.e. guest lists).
- You can find out more at https://cloud.google.com/security/gdpr/ and https://privacy.google.com/businesses/compliance.

Electoral Commission

 We are not currently regulated by the Electoral Commission, but during relevant periods leading up to an election we have been and can be required to register with them as a Non-Party Campaigner, and during these times we are regulated.

- We have to provide information to the Electoral Commission regarding donations that are given for a regulated purpose. If this applies to your donation(s) we will inform you of this.
- There may be other times that we are required to share information with the Electoral Commission at their request.
- You can find out more at https://www.electoralcommission.org.uk/privacy-notice and https://www.electoralcommission.org.uk/privacy-notice and https://www.electoralcommission.org.uk/find-information-by-subject/political-parties-campaigning-and-donations/non-party-campaign-spending-and-donations-at-elections">https://www.electoralcommission.org.uk/find-information-by-subject/political-parties-campaigning-and-donations/non-party-campaign-spending-and-donations-at-elections

PayPal

- We use PayPal to process some of our donations. It will be made clear when you make a donation if it is via PayPal
- PayPal controls the personal information you enter to make a donation in order to process that donation. For more information, please go to https://www.paypal.com/ie/webapps/mpp/ua/privacy-full and https://www.paypal.com/uk/webapps/mpp/paypal-safety-and-security.

Charity Checkout

- Charity Checkout is an online platform that we use to fundraise online and process our donations. It will be made clear when you make a donation if it is via Charity Checkout.
- Charity Checkout controls the personal information you enter to make a donation in order to process that donation. For more information, https://www.charitycheckout.co.uk/privacy/

Google Analytics

- Google Analytics tracks user interaction on our website. This helps us examine the trends of the demographics and interests of those using our website
- The information recorded by Google Analytics does not personally identify you to us. Google Analytics also records your computer's IP address, but this is not share with Scotland in Union.
- You can find out more at https://privacy.google.com/businesses/compliance.

Transfer of your information out of the EEA

Some of our third-party processors are located outside the EEA but are located in countries that are confirmed GDPR compliant.

Data Security

The security of the personal information that we hold is our priority.

We hold information securely using NationBuilder and G Suite and using additional protections when necessary (e.g. additional password protection and encryption) to protect against unauthorised access and theft.

Scotland in Union team members can only access the personal information that they require to complete their work and are subject to a duty of confidentiality.

We will report any suspected data breach to the applicable authorities and to individuals affected as soon as possible.

Privacy Policy Changes

We will regularly review this Privacy Policy and it is subject to changes that ensure that we are in compliance with our obligations under relevant legislation and are taking advantage of the most recent advice available.

How to contact us

If after reading this Privacy Policy you have any questions, please contact us via info@scotlandinunion.co.uk, or alternatively write to us at 272 Bath Street, Glasgow, G2 6AY.

Scotland in Union is Limited Company registered in Scotland, Company Registration No SC492324.