



## ACE Newburgh Privacy Policy

**Introduction:** ACE Newburgh (“we” or “us”) is committed to respecting and protecting your privacy. As a Scottish Charitable Incorporated Organisation (SCIO), we comply with the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018. This Privacy Policy explains in plain English how we collect, use, store, and protect personal information. It applies to our volunteers, members, supporters, and anyone who provides personal data to ACE Newburgh. We want our community to feel confident that their personal information is safe with us, and we only use it in ways you would expect.

**Who We Are:** For purposes of data protection law, ACE Newburgh is the “data controller” for the personal information you provide to us. You can contact us with any questions about your data at [dpo@ace-newburgh.org](mailto:dpo@ace-newburgh.org) (please note this email is monitored by our trustees).

**What Information We Collect:** We only collect personal information that is relevant and necessary for your involvement with ACE Newburgh. This may include:

- **Contact Details:** name, address, postcode, email address, and telephone number.
- **Membership Information:** if you become a member of the charity, we record details needed to administer your membership (such as the date you joined, membership type, and whether you live or work in the Foveran area to meet our membership criteria).
- **Volunteer Information:** if you sign up as a volunteer, we may ask for information via a Volunteer Application Form (for example, your contact details as above, and any relevant skills or availability you wish to share). If a volunteer is under 18 (minimum age 14), we will also collect parental/guardian consent and emergency contact details.
- **Event Participation:** if you register for an event or project, we might note your name and contact info to organise the activity, including any specific needs or emergency contact if relevant.
- **Mailing List:** if you opt to receive our newsletter or updates, we will collect your name and email address for that purpose.
- **Website usage data:** generally, our website does **not** use tracking cookies or analytics to collect personal data on visitors on [ace-newburgh.org](http://ace-newburgh.org). We do not collect any personal information automatically through our site. If in the future we add features like contact forms or analytics, we will update this policy accordingly.

We **do not** collect sensitive personal data (such as health, race, religious beliefs, etc.) unless it is voluntarily provided for a specific purpose (for instance, if you have a medical condition, we should be aware of for volunteering, you may choose to tell us, but we do not actively seek this information).

**How We Use Personal Data:** We will only use your information for the purposes it was provided. Typical uses of your data include:

- **Administration of Membership and Volunteering:** We use your contact and relevant details to communicate with you about ACE Newburgh activities. For members, this includes sending notices of meetings (like the AGM), membership renewals, or important updates. For volunteers, this includes informing you of volunteering opportunities, event details, changes or cancellations, and coordinating activities.
- **Service Delivery:** To organise projects and events you've signed up for. For example, if you volunteer for a tree-planting day, we might use your phone number to update you on meeting point changes or use your email to send a reminder of what to bring.
- **Legal and Regulatory Compliance:** To fulfil our legal obligations as a charity. For instance, we keep a register of members and trustees as required by charity law, and we may need to collect certain information to comply with health and safety or child protection laws if applicable. We may also use data to ensure we are inclusive and meeting any equality duties (e.g. if you disclose an accessibility need, we use that to make reasonable adjustments).
- **Communication and Updates:** We send newsletters or updates about ACE Newburgh's work, events, and community news **only** to those who have consented or where we have another lawful basis (such as our members, for our legitimate interests in furthering the charity's aims). You can opt out of these communications at any time.
- **Internal Records and Planning:** We maintain internal records of our volunteers and members to help us plan activities and understand our volunteer base (for example, keeping track of how many active volunteers we have, or what skills our volunteers are happy to offer).
- **Fundraising and Donations:** If you donate to us or attend a fundraising event, we will use your information to process that donation (and claim Gift Aid if applicable). We do not cold-call or mass-mail for fundraising; any fundraising communications will be targeted and appropriate, or part of general updates you signed up for.

We will **not** use your personal data for any purpose that is incompatible with the original purpose it was collected for, unless we obtain your consent or are required by law to do so.

**Our Legal Bases for Processing:** Under data protection law, we must have a lawful basis to process your information. Depending on the context, our basis may be:

- **Consent:** For example, we ask your consent to add you to our mailing list. You can withdraw consent at any time.
- **Contract:** When you become a member or volunteer, a form of contract (even if not formal employment) is formed – we process your data to fulfil our responsibilities to you (e.g. providing member rights or coordinating your volunteer role)
- **Legal Obligation:** We have legal duties such as maintaining proper records for the charity (e.g. membership list for voting, or information needed to satisfy

safeguarding laws). If we are required by law to disclose data (for example, a court order or for criminal investigations), we will comply.

- **Legitimate Interests:** We may process data for the legitimate interests of running and developing ACE Newburgh – for instance, to communicate with our trustees and members, or improve our volunteer programs. When we rely on this basis, we will ensure our interests are not overridden by your rights and interests.

**Who Has Access to Your Data:** We limit access to personal information strictly to those who need it:

- **Within ACE Newburgh:** Your information is accessible to trustees and certain authorized volunteers (for example, a volunteer coordinator or membership secretary), but only as necessary for their roles. All such persons are informed of the importance of confidentiality and data protection.
- **Third Parties:** We do not sell, trade, or rent your personal information to anyone – **no third-party marketing**. We will only share data with external parties in a few exceptional cases:
  - **Service Providers:** We might use trusted services to help run the charity (for example, an email newsletter platform or cloud storage). In such cases, we ensure any provider is reputable and compliant with data protection law, and only the minimum necessary data is shared. They will not have rights to use your data beyond providing the service to us.
  - **Legal Requirements:** If we are required by law to share data, we will do so. For instance, if police or regulatory authorities demand information for an investigation and have proper authority, or if OSCR (the Scottish Charity Regulator) requests information as part of our compliance.
  - **With Your Consent:** If an opportunity arises to collaborate with another group or highlight volunteer stories, etc., we would only share your information with explicit consent. (As an example, if a partner organisation wants to invite our volunteers to an event, we might facilitate that only if volunteers agree.)
- Aside from the above, your personal data stays within ACE Newburgh's control. Even within the charity, we aim to practice "data minimisation" – meaning people only access the information they genuinely need. For example, our Treasurer might have access to member lists for membership fee records (if we had fees), but a project volunteer would not need that list.

**Data Storage and Security:** We take appropriate measures to secure personal data against unauthorised access, loss, or disclosure. Measures we use include:

- **Secure Digital Storage:** Personal data is stored in digital files (such as our volunteer register or membership list) on secure systems. We use password protection and, where possible, encryption for files containing personal data. Access to these files is limited to trustees or authorised volunteers who need them.
- **Email and Communications:** Our email accounts used for ACE Newburgh business are secured with strong passwords. We avoid sending sensitive

personal data via email; most volunteer/member communications are general. If we ever needed to send something sensitive, we would take precautions (like password-protecting documents).

- **Physical Documents:** As a mostly digital organisation, we keep minimal physical records. Any paper forms (e.g. a signed consent or a sign-in sheet at an event) are stored securely and disposed of (shredded) as soon as they are no longer needed.
- **Website:** As noted, our website does not collect personal data through forms. However, if this changes (say, adding forms or cookies), we will implement appropriate encryption (SSL) and security for those features. Our website hosting is with a reputable provider to ensure its security.
- **Training and Awareness:** Given we are volunteer-led, we ensure that all trustees and any volunteer handling personal data are aware of this policy and good data protection practices. We encourage a principle of **openness** and care: as a rule, ACE Newburgh will not keep any information that we wouldn't be comfortable explaining to the person it's aboutfile-si6us6zapoy3294lhx7zjh. This approach helps us avoid unnecessary or problematic data collection.

**Data Retention – How Long We Keep Information:** We do not keep personal data longer than necessary for the purposes described. Specifically:

- **Members and Volunteers:** If you are an active member or volunteer, we will retain your information for as long as you are involved with ACE Newburgh. If you decide to resign membership or stop volunteering, or if we haven't heard from you despite attempts to confirm your continued interest, we will remove or anonymise your personal details. Typically, we aim to remove your details within **28 days** of you informing us that you have left, or within 28 days of a non-response to a membership renewal or volunteer re-engagement. (For example, if we send an annual "Are you still interested in volunteering?" email and receive no reply by the indicated date, we will take you off the active list.)
- **Event Participation Lists:** If you signed up for a one-time event and are not a regular volunteer or member, we will dispose of your contact info after the event is over and any necessary follow-up is done (unless you gave permission to keep in touch).
- **Mailing List:** If you unsubscribe from our newsletter or updates, we will immediately stop sending you emails. We may keep your email on a suppression list to ensure we respect your opt-out (so it doesn't accidentally get re-added), but no active use.
- **Financial Records (Donations, etc.):** If you donate and provide info for Gift Aid, we are required by HMRC to keep those records for a certain period (usually 6 years). In such cases, we keep the necessary data securely for that period. Other financial-related data (like expense reimbursements to a volunteer) will be kept as long as required by accounting law.
- **Legal Requirements and Archives:** In some cases, we might be required to keep data longer for legal reasons or historical record. For example, as a charity we must retain certain records of our operations. If personal data is part of those records (e.g. minutes of meetings including attendees), we will store them securely and purge any personal data we are not legally or

operationally required to keep. Once the retention period is over, we will ensure data is deleted or destroyed in a secure manner.

- We periodically review the data we hold and delete what's no longer needed. If you have a specific question about how long we keep a certain type of data, please contact us.

**Your Rights:** Individuals whose data we hold have several rights under data protection law. **Your rights include:**

- **Right of Access:** You can ask us to confirm if we hold your personal data and request a copy of that data (this is commonly known as a "Subject Access Request"). We will provide you with the information we have, normally within one month of your request.
- **Right to Rectification:** If any personal data we have is inaccurate or incomplete, you have the right to have it corrected. Please let us know if you change your contact details or spot an error in what we hold.
- **Right to Erasure:** You have the right to request that we delete your personal data if it is no longer necessary for us to keep it. (For example, if you are no longer involved and want all your info removed, we will do so unless legal obligations require retention.)
- **Right to Restrict Processing:** In certain circumstances, you can ask us to stop processing your data temporarily if you contest its accuracy or have objected to processing (we will then limit use while we address your concern).
- **Right to Object:** You may object to processing that is based on legitimate interests or direct marketing. For instance, if we ever did send marketing (which we do only with consent), you could opt out. Or if you object to any other use, we will consider your objection and whether we have compelling grounds to continue.
- **Right to Data Portability:** Applicable mostly if we were processing by consent or contract and the data is provided directly by you, this right allows you to request your data in a commonly used machine-readable format. This is rarely relevant to small charities, but we will accommodate it if it arises.

These rights are not absolute and may have some conditions or exemptions – but ACE Newburgh's approach is to honour them to the fullest extent possible. We will never penalise or refuse a legitimate request. If you wish to exercise any of these rights, please contact us at [dpo@ace-newburgh.org](mailto:dpo@ace-newburgh.org) We may need to verify your identity for security (especially for access or deletion requests) but we will make the process as smooth as we can.

**Queries and Complaints:** If you have any questions about this policy or how we handle your data, you can reach out to us via email (as above) or by writing to us at our registered address (see our website footer for the current address). We will be happy to explain or address any concerns. We take privacy seriously and aim to resolve any issues directly.

If you feel that we have not handled your personal data properly or fulfilled your rights, you also have the right to lodge a complaint with the **Information Commissioner's Office (ICO)**, which is the UK's independent authority on data protection, ACE Newburgh is registered with the ICO. You can find information on

how to report concerns to the ICO on their website [www.ico.org.uk](http://www.ico.org.uk). We would appreciate the chance to address your concerns first, but you are fully entitled to contact the ICO at any time.

**Policy Updates:** We may update this Privacy Policy from time to time to reflect changes in legislation or our practices. We will post any updated policy on the ACE Newburgh website. The date of the latest revision will be noted. If changes are significant, we may also notify our members/volunteers directly. This policy is reviewed at least annually to ensure it remains accurate and user-friendly.

Last updated: 01 November 2025

