

# The Mailler & Whitelaw Trust

## Privacy Notice

### Introduction

The Mailler & Whitelaw Trust is a registered charity in Scotland which operates Glencairn House Residential Care Home. The Mailler & Whitelaw Trust is the “Data Controller” which means we are responsible for deciding how we hold and use personal information. The “Responsible Person” is Malcolm McNaughton who can be contacted by email at [fin@glencairnhouse.org](mailto:fin@glencairnhouse.org) or by post at Glencairn House Registered Office, 178 High Street, Auchterarder, PH3 1AD

This policy is effective from 23<sup>rd</sup> September 2018.

#### **Our new policy tells you about:**

- How you can exercise your rights to control how we use your information
- How we may use your address and phone number to keep you up to date on our work
- How we tailor our communications and make sure you hear from us about things you are interested in

#### **1. Why we collect and use your information**

- We will only use your information where we have a legal basis to do so and will always respect your rights. Where we use your information, it may be because you have consented to us doing so or because we consider we have a legitimate interest to do so. Where we do rely on a legitimate interest to use your information, we will always ensure that this is done in a way so as not to be intrusive or cause distress, and that respects your rights.
- Other reasons may include using information because we have a legal obligation to do so or because we have to fulfil contractual obligations. For example; you have given us consent to use the information for a specific purpose, such as sending you marketing emails; we are using your information in pursuit of a legitimate interest such as building the awareness of Glencairn House for future events and enquiries; to manage our relationship with our clients and anyone we work with; to manage our financial transactions and prevent fraud.
- We also collect sensitive personal data which is defined as any information concerning certain information about an individual including health data and requires stricter protection. The following list identifies the kind of data that we will process and which falls within the scope of “special categories” of more sensitive personal information.

- Information relating to your race or ethnicity, religious beliefs, sexual orientation, sex life and political opinions.
- Information about your health, including any medical conditions, disabilities and health and sickness records.
- Information about criminal convictions and offences.

## **2. How we use your information to fulfil your requests and support you**

To respond to or fulfil any requests, complaints or queries you make to us if you contact us directly, we will use the information you give to us to handle your enquiry or request. This may include responding to your query or feedback or sending you relevant information such as a proposal and marketing materials. This can help us handle queries more efficiently. Where you provide contact details we will provide information and support by post, phone, mobile messaging, email, via social media and any other channels for which you have provided your details.

### **3. How we use your information**

3.1 To send you marketing communications by email, mobile messaging, or direct message on social media where you have agreed to this.

Where you have provided an email address, mobile phone number or details of your social media profiles and consented to being contacted in this way we will send you information by those channels, including direct message through social media.

3.2 To contact you by phone and post

Where it is appropriate and relevant, and you have provided us with a telephone number or a postal address, we may occasionally call or write to you to provide information about Glencairn House.

3.3 To manage your contact preferences

You can tell us to stop contacting you, or change the way in which you do so, by getting in touch with us at [fin@glencairnhouse.org](mailto:fin@glencairnhouse.org). We will keep a record of any requests to stop receiving marketing from us to ensure that we do not communicate with you in the future unless you tell us you want to hear from us again.

3.4 To target our digital and social media marketing

1. On occasion we will use the information you provide to us to target our digital and social media advertising effectively. This could include securely providing contact details such as your name and email address to digital advertising networks or social media companies such as Facebook, Google and Twitter. Any information we share with social media companies will be shared in an encrypted format and will not be used for their own purposes. You can stop your information being used for this by contacting us. You can control the kind of

advertising which you see through the relevant social media site, Facebook, LinkedIn or Twitter.

#### **4. Sharing your information with other organisations**

We will never share your information with third parties for their own purposes.

Our website may contain links to other websites of interest. However, once you have used these links to leave our site, you should note that we do not have any control over that other website. Therefore, we cannot be responsible for the protection and privacy of any information that you provide whilst visiting such sites and such sites are not governed by this privacy statement. You should exercise caution and look at the privacy statement applicable to the website in question.

#### **5. How long we keep your personal information for**

How long we keep your personal information for depends on the services we provide to you. We will never retain your personal information for any longer than is necessary for the purposes we need to use it for.

#### **6. Your online activities**

6.1 We use cookies to track your use of our website. We may use cookies to provide tailored marketing messages when you are logged into our website, if you have given us consent.

6.2 A cookie is a small file which is sent to your browser and stored on your computer's hard disc and helps us understand and track your use of our website and where we can improve the information and services provided. We use cookies solely to gather information on IP addresses, to analyse trends, administer the website, track your movements on the website and gather broad demographic information for aggregate use. For information about blocking the use of cookies, please refer to the instructions/help screen on your internet browser. Please note that you may not be able to use or access certain parts of the website or online services if you block the use of all cookies.

#### **7. Your Privacy Rights**

You have the right to object to how we use your personal information. You also have the right to see what personal information we hold about you. In addition, you can ask us to correct inaccuracies, delete or restrict personal information or to ask for some of your personal information to be provided to someone else. You can make a complaint to us and can find the best way to get in touch via the details on our website

[www.glencairnhouse.org](http://www.glencairnhouse.org).

- 7.1 **Right to object:** You can object to our processing of your personal information. Please contact us as noted above, providing details of your objection.
- 7.2 **Access to your personal information:** You can request access to a copy of your personal information that we hold, along with information on what personal information we use, why we use it, who we share it with and how long we keep it for. You can make a request for access free of charge by contacting us as noted above. Please make all requests for access in writing and provide us with evidence of your identity.
- 7.3 **Right to withdraw consent:** If you have given us consent to use personal information, you can withdraw your consent at any time and update your marketing preferences by calling us directly.
- 7.4 **Rectification:** You can ask us to change or complete any inaccurate or incomplete personal information held about you.
- 7.5 **Erasure:** You can ask us to delete your personal information where it is no longer necessary for us to use it, you have withdrawn consent, or where we have no lawful basis for keeping it.
- 7.6 **Portability:** You can ask us to provide you or a third party with some of the personal information that we hold about you in a structured, commonly used, electronic form, so it can be easily transferred.
- 7.7 **Restriction:** You can ask us to restrict the personal information we use about you where you have asked for it to be erased or where you have objected to our use of it.
- 7.8 **Make a complaint:** You can make a complaint about how we have used your personal information to us, by contacting us via the details on our website [www.glencairnhouse.org](http://www.glencairnhouse.org) or to a supervisory authority – for the UK this is the Information Commissioner’s Office at <https://ico.org.uk>. We will not make any charge for responding to any request from you to exercise your privacy rights, and we will respond to your requests in accordance with our obligations under data protection law.

