

Seamab Privacy Notice

for children and families, donors and fundraisers, and external contractors

1. Contact and introduction

Our contact details

Name: Seamab

Address: Rumbling Bridge, Kinross, KY13 0PT

Phone Number: 01577 840307

E-mail: info@seamab.org.uk

Our charity number: SC011002

Data Protection Officer: our Data Protection Officer is Lesley Selbie, from RGDP. If you need to contact Lesley, please speak to Wendy Michie in the first instance.

Privacy Policy Updated: June 2022

This privacy notice tells you about the personal data we at Seamab collect, how we handle and store it and the measures we take to keep it safe. It also tells you what rights you have in relation to personal data we hold about you. This notice is for children and families who use our services, our donors, supporters and fundraisers, and our commercial, or professional contacts, contractors and supplies. We have a separate Staff Privacy Notice for our employees, volunteers and trustees; if you need to access our Staff Privacy Notice please contact us.

We promise to use the information we collect about you in accordance with the General Data Protection Regulation (2018) (GDPR), the Data Protection Act (2018) and the Privacy and Electronic Communications Regulations (PECR, 2003). We aim to be clear when we handle your data and not do anything you wouldn't reasonably expect.

If you need further information which is not covered in the notice, about how we use or store your personal data please do get in touch with us using one of the methods listed above.

When we make changes to this Privacy Notice we will let you know by providing an announcement on our website.

2. What does Seamab do?

At Seamab we look after, educate and support young people aged between 5 and 18 who have complex needs. We also employ staff, work with visiting specialists and contractors for different types of projects.

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3. The type of personal information we hold

We currently collect and process personal information about the following people:

- Children and families who use our service
- Our donors, supporters and fundraisers
- Commercial or professional contacts, suppliers or contractors
- People who visit our website.

3.1 Children and Families

The information we hold about children and families

We may hold some, or all, of the following information about the children and families (including adoptive or foster families, or kinship carers/guardians) who use our services:

- Full name
- Contact details (addresses, email addresses, contact numbers)
- Information about family background, personal experiences and circumstances, social work and education involvement, health and wellbeing
- Information given to us, or created by us, in the course of Seamab providing services
- Some of the information given to use or created by us may include:
 - Special category personal data revealing race or ethnic origin, religious or political beliefs, genetic or health information, information about an individual's sex life or revealing a person's sexual orientation
 - Information about any criminal convictions that have been committed against an individual, or which an individual has committed
 - Information about an individual's finances and financial situation
- Information about an individual's legal status (in terms of whether or not they are on a Child Protection Register, whether or not a supervision requirement is in place, or whether or not they are looked after at home or away from home)
- Information about advocates or other representatives we may encounter in the delivery of services

However, the information we will process about children and families will vary depending on individual circumstances.

Sources of the personal information

Some of the personal information we have about children and families is given to us by other organisations. These may include, but are not limited to:

- Local authority social work departments, educational psychologists, and teachers
- NHS staff, and other health care professionals
- Police Scotland

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Some of the personal information we hold is created by our staff at Seamab or disclosed to us by the children.

Legal basis for processing the data

We use this information to help us provide children and families with the services they require. We may be under a legal obligation to collect, handle, share or record information in connection with an individual’s legal status.

Under the UK General Data Protection Regulation (UK GDPR), the lawful basis we rely on for processing this information is Article 6.1 (c) – processing is necessary for compliance with a legal obligation to which the controller is subject.

Under the GDPR the lawful basis we rely on for processing special category data is Article 9.2. (h) – processing is necessary for the provision of social care services.

Information sharing

We may need to share this information with the following individuals or organisations

- Local authorities, social work professionals, education professionals
- Police Scotland
- Health and wellbeing professionals
- External specialists we may employ to work with the children
- Safeguarding bodies and others in connection with Children’s Hearings
- Other charities or public sector organisations that may be providing services to the children and family
- Other family members (where agreement has been sought)
- Statutory bodies in connection with legal and formal processes

Information storage

The personal information is stored on our secure IT systems, supported by a third-party IT provider. Information is also stored on paper, in locked cabinets, in a locked and alarmed building.

Information retention

We keep this information for as long as we provide services to the child concerned. Once the child leaves our service we keep the information for 100 years from the date of birth of the child concerned. We keep the information in case the child wants to access it at any point in the future to find out more about their childhood and life.

At the time of this notice the Scotland Historical Child Abuse Inquiry is ongoing and we cannot destroy any data which may be relevant to that Inquiry. For this reason we currently keep children’s records for 100 years from the date of birth. This may be subject to change once the Inquiry issues its findings.

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Information rights

Children and families have the following rights under data protection law:

- The right of access. You have the right to ask us for copies of your personal information.
- The right of rectification. You have the right to ask us to rectify personal information you think is inaccurate. You also have the right to ask us to complete information you think is incomplete.

3.2 Our donors, supporters and fundraisers

The information we hold about donors, prospective supporters and fundraisers

We may need to collect, use and store the following information:

- Full name
- Contact details (address, email, and contact number)
- Payment information (which may include bank account details if you have set up a direct debit to support us, and information that we require to comply with Gift Aid requirements)
- The amounts you have donated or raised and your donation, or fundraising history
- Records of your correspondence and engagement with us, including events which you have attended
- Details on individuals, companies or trusts that you have chosen to share with us
- Your occupation and biographical information
- Date of birth (where this is required for participation in an event or for young people who wish to help with fundraising, since accompaniment by an adult may be required depending on the activity)
- Photographs, videos or audio recordings
- Whether or not you have agreed to receive further information from us about news, events and other marketing

We use this information as necessary to process your donation and to ensure that your donation is properly recognised. Information may also be used on an anonymous basis for internal financial management purposes, so that we can validate our internal finance records and compare financial data against expectations, budget and previous years.

We may also need to share information with HMRC when reporting on our taxes, however information is only shared with HMRC on an anonymous basis.

We generally retain supporter information for 6 years, in line with HMRC gift-aid requirements.

Prospect Research

As a fundraising organisation we undertake in-house research, and occasionally engage specialist external agencies, to learn more about our current supporters and to identify prospective supporters. The information we gather helps us to identify the interests of

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people and organisations and the potential for them to support Seamab financially. We do this to better understand our supporters and retain their support, and to engage new supporters, enabling us to generate philanthropic income for Seamab. The legal basis we are relying on to conduct this research is legitimate interest.

If we do engage a specialist external agency, the work they do for us will be subject to a contract with Seamab, which will specify that they will only use the data for the purpose they are engaged for, and that the data will be held securely and won't be sold or reused for another purpose.

When we undertake in-house research we will use information you have already given us, or information from publicly available sources, such as the Electoral Register, Companies House, company websites, social networks such as LinkedIn and internet search engines.

When determining whether we will undertake this type of research we will always complete an assessment that considers your rights as an individual. Any research undertaken will never be excessive and will always go through a rigorous internal due diligence process. If you would prefer us not to use your data in this way, please email us at info@seamab.co.uk

Sources of the personal information

Most of the information we receive about donors, supporters and fundraisers is received directly from the people themselves.

Some of the information we hold comes from external fundraising organisations (such as JustGiving). Please note Seamab does not have any control or oversight over any of the personal information that you may provide or submit to a third-party website. We would recommend that you check the privacy policies issued by those websites to see how they handle your information.

Legal basis for processing

This information is necessary for us to keep in contact with supporters about their activities to support us, to process the funds they donate or raise, and to ensure they are recognised for their support.

Under the GDPR the lawful basis we rely on for processing this information is Article 6.1 (f) – that is in our legitimate interest to raise funds to aid our work. In some circumstances we will need your consent to use your information, for example if we would like to mention your fundraising or donation in our marketing. We will always ask for your consent before we use your personal information.

Information sharing

The personal information may be shared with third parties we use who help us process payments. We may issue marketing communications to you, where you have agreed to receive marketing from us.

We offer the use of Blackbaud eTapestry to make donations and we have a payment gateway operated on behalf of and under contract to us by service providers which looks

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similar to our main website. Further information about the collection and use of the data will be provided for you on the relevant payment gateway.

If you use a credit or debit card to may a payment to us, we will ensure this is done securely and in accordance with the Payment Card Industry Data Security Standard.

Users of our website – when someone visits www.seamab.org.uk we use a third party service, Google Analytics, to collect standard internet log information and details of visitor behaviour patterns. We do this to find out things such as the number of visitors to various parts of the site.

This information is only processed in a way which does not identify anyone. We do not make, and do not allow Goole Analytics to make, any attempt to find out the identities of those visiting our website. If we do want to collect personal information through our website, we will make this clear and explain what we will do with it.

Our website may also include links to other websites, not owned, associated with, or managed by Seamab. While we try our best to only link to reputable websites, we cannot be held responsible for the privacy of information collected by sites not managed by us, nor can we accept responsibility or liability for them. For this reason, you should consult the privacy policy on any external website you link to before you submit any personal information to those websites.

Information storage

We do not store your credit or debit card details at all, following your transaction being completed. All card details and validation codes are securely destroyed once the payment has been processed.

If you send an email containing credit or debit card details it will be immediately destroyed.

Information retention

We keep information about financial transactions for 7 years in line with HMRC requirements.

Information rights

Under data protection law donors, fundraisers and supporters have the following rights:

- The right of access: You have the right to ask us for copies of your personal information.
- The right to data portability. You have the right to ask that we transfer the personal information you gave us to another organisation, or to you, in certain circumstances.
- Your right to object to processing. You have the right to object to the processing of your personal information in certain circumstances.
- The right to erasure. You have the right to ask us to erase your personal information in certain circumstances.

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- The right to rectification: You have the right to ask us to rectify personal information you think is inaccurate. You also have the right to ask us to complete information you think is incomplete.

3.3 Information about suppliers and contractors

We may need to collect, use and store the following information:

- Contact details (name, address, email address, phone number)
- Bank account details

Information sources

The information we hold has been provided by the data subjects themselves or found from another publicly available source such as their own website.

Legal basis for processing

Under the GDPR the lawful basis we rely on for processing this information is Article 6.1 (f) that it is in our legitimate interest to hold information about people who may be able to provide services to us.

Also, in some cases we will rely on Article 6(1)(b) when suppliers are party to a contract with us.

Information sharing

We may on occasion need to share information with our auditors who may request a sample of our invoices and statements.

Information storage

The personal information is stored on our secure IT systems, supported by a third-party IT provider. Information is also stored on paper, in locked cabinets, in a locked and alarmed building.

Information retention

We will retain the personal information for the duration of our relationship with them. We retain records of our financial transactions for 7 years in line with HMRC requirements.

Information rights

Under data protection law our suppliers and contractors have the following rights:

The right of access - You have the right to ask us for copies of your personal information.

The right to rectification - You have the right to ask us to rectify personal information you think is inaccurate. You also have the right to ask us to complete information you think is incomplete.

You are not required to pay any charge for exercising your rights. If you make a request, we have one month to respond to you.

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Complaints

You may make a complaint about our data processing activities by contacting us using the details above. Alternatively, you may make a complaint to the UK supervisory authority, the Information Commissioner’s Office by visiting their website: <https://ico.org.uk/make-a-complaint/>, by phoning them on 0303 123 1113, or by writing to them at

Information Commissioner’s Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

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