

DATE PROTECTION AND GDPR POLICY

for

DALGETY COMMUNITY TRUST

Introduction

DALGETY COMMUNITY TRUST (the Trust) is a registered charity as well as a company limited by guarantee. The Trust is run for the following purpose:

The Trust has been formed to benefit principally those parts of the KY11 9 and KY11 7 postcodes which lie within the Community Council area of Dalgety Bay and Hillend Community Council, as defined from time to time by Fife Council. The objectives of the Trust are:-

1. The advancement of community development (including urban and rural regeneration) principally within the community
2. The advancement of citizenship
3. The advancement of environmental protection or improvement
4. The provision of recreational facilities, or the organisation of recreational activities, with the object of improving the conditions of life for the persons for whom the facilities or activities are primarily intended
5. The advancement of the arts, heritage, culture or science
6. The relief of those in need by reason of age, ill-health, disability, financial hardship or other disadvantage

The Trust is a company limited by guarantee and a Charity, registered in Scotland and based at:

3 St David's Business Park,
Dalgety Bay,
Dunfermline,
Fife
KY11 9PF

Registered Charity Number: SC052690

Company Number: SC637544

We are committed to protecting personal data and complying with:

- **UK General Data Protection Regulation (UK GDPR)**
- **Data Protection Act 2018**
- **Guidance issued by the Information Commissioner's Office**

PART A – DATA PROTECTION POLICY (Internal Governance)

Policy Statement

The Trust recognises its responsibility to process personal data lawfully, fairly and transparently.

The Trustee-Directors have overall responsibility for ensuring that the Trust complies with data protection legislation. Day-to-day responsibility is delegated to the Company Secretary.

All Trustee-Directors and volunteers handling personal data must:

- Only access information necessary for their role
- Keep information secure
- Not share personal data without proper authority
- Report any suspected data breach immediately

Data Protection Principles

We comply with the UK GDPR principles by ensuring personal data is:

1. Processed lawfully, fairly and transparently
2. Collected for specified, explicit purposes
3. Adequate and limited to what is necessary
4. Accurate and kept up to date
5. Retained only as long as necessary
6. Kept secure
7. Processed with accountability

Lawful Bases for Processing

Depending on the activity, we rely on:

- **Consent** – for newsletters and marketing communications
- **Legitimate Interests** – for administering membership and community engagement
- **Legal Obligation** – for financial and statutory record-keeping
- **Contract** – where processing is necessary to fulfil membership arrangements

Where consent is relied upon, it may be withdrawn at any time.

Data We Process

We may process:

- Name
- Address
- Email address

- Telephone number
- Membership information
- Records of participation in events
- Website usage data (via analytics)

We do not intentionally collect special category (sensitive) data unless required for a specific lawful purpose.

Data Security

We protect personal data by:

- Storing digital records in password-protected systems
- Limiting access to Trustee-Directors/volunteers with a legitimate need
- Using secure cloud-based platforms (e.g. Mailchimp)
- Keeping paper records secure
- Ensuring Trustee-Directors use secure personal devices

Data Retention

We retain personal data only as long as necessary:

- Membership records: Duration of membership + 6 months
- Financial records: 6 years (legal requirement)
- Gift Aid records: 6 years
- Complaints or incident records: As appropriate to the nature of the matter

Data is securely deleted or destroyed when no longer required.

Data Sharing

We do not sell or trade personal data.

We may share data with:

- Professional advisers (e.g. accountants)
- Regulatory authorities where legally required
- Approved service providers (e.g. email distribution platforms)

Where third-party processors are used, we ensure appropriate data protection safeguards are in place.

Data Breaches

A data breach includes loss, unauthorised access, disclosure or alteration of personal data.

All suspected breaches must be reported immediately to the Company Secretary.

Where required, breaches will be reported to the Information Commissioner's Office within 72 hours and affected individuals will be informed where there is a high risk to their rights and freedoms.

Training and Awareness

Trustee-Directors and volunteers (where appropriate) will be made aware of their data protection responsibilities, and this policy will be reviewed annually.

PART B – PRIVACY NOTICE (External)

How We Collect Personal Information

We collect personal information when you:

- Become a member
- Subscribe to updates
- Contact us
- Participate in surveys
- Attend events
- Visit our website

Most information is provided directly by you.

Why We Use Your Information

We use your information to:

- Administer membership
- Inform you about Trust activities and events
- Conduct surveys and consultations
- Manage fundraising activities
- Maintain financial records
- Operate and improve our website

We will not use your data for unrelated purposes without informing you.

Marketing Communications

We send newsletters and updates where you have given consent or where we believe there is a legitimate interest in keeping members informed.

You can unsubscribe at any time using the link in our emails or by contacting:

secretary@dalgetycommunitytrust.co.uk

Your Rights

Under UK data protection law, you have the right to:

- Access your personal data
- Request correction of inaccurate data
- Request erasure (in certain circumstances)
- Restrict processing
- Object to processing
- Request data portability

Requests should be made to:

Company Secretary
Dalgety Community Trust
3 St David's Business Park
Dalgety Bay
Fife
KY11 9PF
secretary@dalgetycommunitytrust.co.uk

We will respond within one month.

Complaints

If you are unhappy with how we handle your personal data, please contact us in the first instance.

You also have the right to complain to the:

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF
Helpline: 0303 123 1113
Website: www.ico.org.uk

Policy Review and Approval

This policy is reviewed every two years by the Board of Directors to ensure continued compliance and proportionality.

This Policy is approved and robustly endorsed by DALGETY COMMUNITY TRUST.



Signed: _____ **PHILIP EVANS**
(CHAIR)

Date: 1st March 2026

Status Control

Version	Date	Status	Prepared By	Reason for Revision
1.1	March 2023		Lesley Sinclair	Original Document
2.0	March 2026		Phil Evans	Revision to Reflect latest best practice, compliance and guidance