

PRIVACY NOTICE FOR VOLUNTEERS

version 2.2

What is the purpose of this document?

Sunflower Scotland SCIO is committed to protecting the privacy and security of your personal information.

This privacy notice describes how we collect and use personal information about you during and after you volunteer with us, in accordance with the UK General Data Protection Regulation (UK GDPR).

Sunflower Scotland SCIO (charity number SC052092 and registered address 5 South Charlotte Street, Edinburgh EH2 4AN) is a "controller". This means that we are responsible for deciding how we hold and use personal information about you. We are required under data protection legislation to notify you of the information contained in this privacy notice.

This notice applies to current and former volunteers. We may update this notice at any time but if we do so, we will provide you with an updated copy of this notice as soon as reasonably practical.

It is important that you read and retain this notice, together with any other privacy notice we may provide on specific occasions when we are collecting or processing personal information about you, so that you are aware of how and why we are using that information and what your rights are under the data protection legislation.

Data protection principles

We will comply with data protection law, which says that the personal information we hold about you must be:

1. Used lawfully, fairly and in a transparent way.
2. Collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes.
3. Relevant to the purposes we have told you about and limited only to those purposes.

4. Accurate and kept up to date.
5. Kept only as long as necessary for the purposes we have told you about.
6. Kept securely.

The kind of information we hold about you

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the person's identity has been removed (anonymous data).

There are certain types of more sensitive personal data which require a higher level of protection, such as information about a person's health or criminal convictions.

We will collect, store and use the following categories of personal information about you:

- Personal contact details such as name, title, addresses, telephone numbers and personal email addresses.
- Date of birth.
- Gender.
- Marital status and dependants.
- Details of any military service.
- Copy of driving licence.
- Passport details.

We may also collect, store and use the following more sensitive types of personal information:

- Information about your health, including any medical conditions.

How is your personal information collected?

We collect personal information about you directly: verbally, via messenger apps, email and forms. We may sometimes collect additional information from third parties including background check agencies.

We may collect additional personal information from you in the course of you volunteering with us.

How we will use information about you

We will only use your personal information when the law allows us to, and when we need to perform charitable activities for which you volunteered. Most commonly, we will use your personal information in the following circumstances:

1. Where we need to book tickets, provide personal information for border crossing, or prepare customs declarations
2. Where we need to perform any agreement we have entered into with you.
3. Where we need to comply with a legal obligation.

4. Where it is necessary for legitimate interests pursued by us or a third party and your interests and fundamental rights do not override those interests.
5. We may also use your personal information where we need to protect your interests (or someone else's interests).

Situations in which we will use your personal information

We need all the categories of information in the list above primarily to allow us to engage you as a volunteer and to enable us to comply with legal obligations. In some cases, we may use your personal information to pursue legitimate interests, provided your interests and fundamental rights do not override those interests. The situations in which we will process your personal information are listed below.

- Planning our charitable activities.
- Booking tickets for charitable trips.
- Submitting customs declarations to authorities.
- Assessing qualifications for a particular volunteer mission.
- Making decisions about your continued engagement with us.
- Education, training and development requirements.
- Ascertaining your fitness to volunteer.
- Complying with health and safety obligations.

Some of the above grounds for processing will overlap and there may be several grounds which justify our use of your personal information.

If you fail to provide personal information

If you fail to provide certain information when requested, we may not be able to engage you as a volunteer. For example, without your passport details we will not be able to book your tickets for a humanitarian trip.

Without certain personal information we may be prevented from complying with our legal obligations (such as to ensure the health and safety of our volunteers).

Change of purpose

We will only use your personal information for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If we need to use your personal information for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal information without your knowledge or consent where this is required or permitted by law.

How we use particularly sensitive personal information

Special categories of particularly sensitive personal information, such as information about your health, require higher levels of protection. We need to have further justification for collecting, storing and using this type of personal information. We may process special categories of personal information with your explicit written consent.

Less commonly, we may process this type of information where it is needed to protect your interests (or someone else's interests) and you are not capable of giving your consent, or where you have already made the information public.

Situations in which we will use your sensitive personal information

In general, we will not process particularly sensitive personal information about you unless it is necessary for in connection with you volunteering for us. The situations in which we will process your particularly sensitive personal information are listed below.

- We will use information about your physical or mental health, or disability status, to:
 - ensure your health and safety;
 - assess your fitness to volunteer; and
 - provide appropriate adjustments relating to you volunteering with us.
- If we reasonably believe that you or another person are at risk of harm, we may process your sensitive personal information to protect you or them from physical, mental or emotional harm or to protect physical, mental or emotional well-being.

Do we need your consent?

We will ask for your written consent to allow us to process certain particularly sensitive data. If we do so, we will provide you with full details of the information that we would like and the reason we need it, so that you can carefully consider whether you wish to consent.

We do not need your consent where the purpose of the processing is to protect you or another person from harm or to protect your well-being and if we reasonably believe that you need care and support, are at risk of harm and are unable to protect yourself.

Information about criminal convictions

We may only use information relating to criminal convictions where the law allows us to do so. This is usually where that processing is necessary to carry out our obligations.

We do not envisage that we will hold information about criminal convictions.

We will only collect information about criminal convictions if it is appropriate given the nature of the volunteering activities and where we are legally able to do so.

Data sharing

We may have to share your data with third parties such as travel companies, UK, EU and Ukraine customs authorities.

Why might you share my personal information with third parties?

We will share your personal information with third parties if it is required to perform our charitable activities in which you participate, and/or when it is required by law, where it is necessary to administer the relationship with you or where we have another legitimate interest in doing so.

Here is how your personal information typically is shared by us (we may share it in other ways as explained above):

Type of personal information	Who it is shared with	Purpose
Name, date of birth, passport number and expiry date	Ferry, Train, Bus operators (e.g. P&O Ferries, Ryanair, Flixbus)	Ticket booking, advance passenger information
Name	Hotels, booking websites	Hotel booking
Name, passport number	Ukrainian charity, Ukraine government	Preparing and submitting Ukraine customs declaration
Name, address, job title, driving license number	Insurance broker (e.g. Tempcover, RAC Dayinsure)	Insurance

Transferring information outside the UK

We generally do not transfer your personal data out of the UK. However, we will transfer your name and passport number to the Ukrainian authorities prior to any trip you make with us to the Ukraine (we must make this transfer of your personal data or you cannot travel to the Ukraine). Please note there are no adequacy regulations in respect of Ukraine. This means that Ukraine is not deemed by the UK government to provide an adequate level of protection for your personal information.

Data security

We have put in place measures to protect the security of your information. Details of these measures are available on request.

We have put in place appropriate security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. Additionally, we limit access to your personal information to those employees, agents, contractors and other third parties who have a business need to know.

We have put in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so.

Data retention

How long will you use my information for?

We will only retain your personal information for as long as necessary to fulfil the purposes for which we collected it, including for the purposes of satisfying any legal, accounting or reporting requirements. Details of retention periods for different aspects of your personal information are available on request.

To determine the appropriate retention period for personal data, we consider:

- The amount, nature and sensitivity of the personal data.
- The potential risk of harm from unauthorised use or disclosure of your personal data.
- The purposes for which we process your personal data and whether we can achieve those purposes through other means.
- The applicable legal requirements.

In some circumstances, we may anonymise your personal information so that it can no longer be associated with you, in which case we may use that information without further notice to you. Once you are no longer a volunteer, we will retain and securely destroy your personal information in accordance with applicable laws and regulations.

Rights of access, correction, erasure and restriction

Your duty to inform us of changes

It is important that the personal information we hold about you is accurate and current. Please keep us informed if your personal information changes during your working relationship with us.

Your rights in connection with personal information

Under certain circumstances, by law you have the right to:

- **Request access** to your personal information (commonly known as a data subject access request). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.
- **Request correction** of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.
- **Request erasure** of your personal information. This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal information where you have exercised your right to object to processing (see below).
- **Object to processing** of your personal information where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground. You also have the right to object where we are processing your personal information for direct marketing purposes.

- **Request the restriction of processing** of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.
- **Request the transfer** of your personal information to another party.

If you want to review, verify, correct or request erasure of your personal information, object to the processing of your personal data, or request that we transfer a copy of your personal information to another party, please contact us in writing.

No fee usually required

You will not have to pay a fee to access your personal information (or to exercise any of the other rights). However, we may charge a reasonable fee if your request for access is clearly unfounded or excessive. Alternatively, we may refuse to comply with the request in these circumstances.

What we may need from you

We may need to request specific information from you to help us confirm your identity and ensure your right to access the information (or to exercise any of your other rights). This is another appropriate security measure to ensure that personal information is not disclosed to any person who has no right to receive it.

Right to withdraw consent

In the limited circumstances where you may have provided your consent to the collection, processing and transfer of your personal information for a specific purpose, you have the right to withdraw your consent for that specific processing at any time. To withdraw your consent, please contact us in writing. Once we have received notification that you have withdrawn your consent, we will no longer process your information for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so in law. Please note that if you withdraw your consent you may not be able to volunteer with us.

Changes to this privacy notice

We reserve the right to update this privacy notice at any time, and we will provide you with a new privacy notice when we make any substantial updates. We may also notify you in other ways from time to time about the processing of your personal information.

I (name, surname):

of (address)

acknowledge that on (date)

I received a copy of Sunflower Scotland's privacy notice for volunteers and that I have read and understood it.

Signature: