DATA PRIVACY STATEMENT
(including the use of Cookies)

North Berwick Pipe Band (the Band) ("we") promise to respect the confidentiality of any personal data you share with us, or that we have access to through Royal Scottish Pipe Band Association (RSPBA), to keep it safe, and we will always take every effort to protect your privacy.

We pride ourselves on our honesty and openness and will always be clear how, when and why we collect and process your information; we promise we will never do anything with your details that you wouldn't reasonably expect.

Developing a better understanding of our members and supporters is crucial, and your personal data allows us to manage your membership and provide the services you are entitled to.

It is expected that band officers may also process member personal data on behalf of the Band and they too will also be bound by this privacy notice.

We collect information in the following ways:

When you give it to us DIRECTLY
There are many ways you may give us your information. For example, when you join as a member, begin volunteering, make a donation, purchase our products or communicate with us either by phone, in writing, including email or in person. We are responsible for your data at all times.

When you give it to us INDIRECTLY
Your information may be shared with us by independent organisations. These independent third parties will only share your information when you have consented. You should check their Privacy Notice when you provide your information to understand fully how they will process your data.

Via Social Media
Depending on your settings or the privacy notices for social media and messaging services like Facebook, WhatsApp, LinkedIn or X (formerly known as Twitter), you might give us permission to access information from those accounts or services.

Via information available publicly
This may include information found in places such websites Companies House and information that has been published in articles/newspapers.

Cookies
Like most websites, we use "cookies" to help us make our site, and the way you use it, better. We do not store any personal data in the cookies that we use.
Cookies mean that a website will remember you. They're small text files that sites transfer to your computer (or phone or tablet). They make interacting with a website faster and easier – for example by automatically filling your name and address in text fields.

In addition, the type of device you're using to access our website or apps and the settings on that device may provide us with information about your device, including what type of device it is, what specific device you have, what operating system you're using, what your device settings are. Your device manufacturer or operating system provider will have more details about what information your device makes available to us.

The type and quantity of information we collect and how we use it depends on why you are providing it. You should be able to control what cookies are placed on your device through your browser settings. Go to **www.aboutcookies.org** to find out more about cookies, including how to see what cookies have been set and how to manage and delete them.

We do not analyse the use of our website or collect any data relating to its use.

What personal information we collect and how we use it
We will only ever capture the minimum amount of information that we need to in relation to your membership, donation or services we provide to you and we promise to keep your information secure. The personal data we will usually collect is:

- Your name
- Your contact details
- Your date of birth
- Your bank or credit card details (as relevant to the service provided)
- Details of the enquiry, service or product

Where it is appropriate, we may also ask for additional information which will be explained to you at the time.

How we will use your data
We will use your personal data for the legitimate interest of conducting core business activities, these will include:

- Administer your membership or donation, including processing Gift Aid
- Provide you with the services, products or information you asked for.
- Providing services, products, guidance or information for general activities, including Disclosure and Barring Service checks
- Communicating organisational messages and information to members and band officers
- Facilitate training, meetings and other special event planning
- Providing information and updates to Band officers
- Preparation of Band directories
- To present our website and its contents to you and to allow you to participate in interactive features on our website
- Keep a record of your relationship with us
- Understand how we can improve our services, products or information
- In any other way we may describe when you provide the information
- For any other purposes with your consent

Sensitive information
We do not collect any personal information on members classified as 'sensitive' under GDPR.

Under 18's data
We do collect name, date of birth and contact information from under 18's through their parents or legal guardians. This information is used to intimate short notice changes to tutoring or practises, to inform of upcoming engagements and to comply with restrictions when entering youth events.

Data Sharing

1) Our service/host providers

We will ensure that data processing agreements, compliant to GDPR, are in place before sharing with, or giving access to, your data with any of our service/host providers, for instance:

- **IONOS** –our secure hosting service provider.
- **Banking organisations** – those that provide our banking/payment services.
- **HMRC** – for Gift Aid, tax and employment details.
- **Royal Scottish Pipe Band Association** – when required for registering members for competitions.
- **WhatsApp** – for group communication within the Band.

We will ensure that data processing agreements, compliant to GDPR, are in place before sharing with, or giving access to, your data with any of our service/host providers.

2) Sharing within the wider pipe band organisation

The Pipe Band organisation is made up of the RSPBA and the Band.
When you give information to us it will be shared within the wider organisation to facilitate your membership and to provide the service afforded to you as part of that membership. We will ensure that data processing agreements, compliant to GDPR, are in place before sharing your data within the wider organisation.

The Band is a data processor for some of your personal information associated with your membership and will process your data in accordance with the RSPBA privacy notice. The Band also collects personal data for individual Band activities and is therefore also an independent data controller. This means the Band is also legally responsible for protecting your data under GDPR legislation.

3) Sharing with third parties

We will never commercially sell your personal data to anyone else.
We will only ever share your personal data in other circumstances, not listed above, if we have your explicit and informed consent at the time of collection. However, we may need to disclose your details if required to the police, other agencies, for example HMRC, regulatory bodies or our legal advisors.

How we keep your information safe and who has access to it

We ensure that there are appropriate physical and technical controls in place to protect your personal details. For example, confidential paper records are securely stored, our online forms are encrypted and our network is protected and routinely monitored.
We undertake regular reviews of who has access to information that we hold to ensure that your personal information is only accessible by appropriate officers.
We have a duty to report certain types of personal data breaches to the relevant supervisory authority, and where feasible, we will do this within 72 hours of becoming aware of the breach. If a breach is detected and likely to result in a high risk of adversely affecting you, we will inform you without undue delay.

Where we store your information

Your personal information will be hosted securely within the UK.

How long we retain your information and how we keep it up to date
We will only keep your information for as long as we need it to assist you with your enquiry, process your membership, donation, or other services associated to your band membership. There are statutory timescales on how long we should keep your information, for example financial records must be kept for seven years, information associated with Health & Safety for three years after an event. We shall delete your information according to these statutory limits, or according to guidance issued by the Information Commissioner.
Where necessary, we will keep your information accurate and up-to-date.

Your rights
The General Data Protection Regulations gives you certain rights and these are listed below for your convenience, further clarification of your rights is available on the **Information Commissioners website** – www.ico.org.uk

- You have a right to be informed when your personal data is being collected, what is collected and how it will be used or shared.
- You have a right of access to your personal data: the right of access allows you to be aware of and verify the lawfulness of the processing of your personal data. Members and donors can request a copy of the information that we hold on you. This information will be provided free of charge, unless the request is found to be manifestly unfounded or excessive then a reasonable fee will be charged. The application should be made in writing, by letter or email, and addressed to the Hon. Secretary, North Berwick Pipe Band, contact details shown below, enclosing two proofs of identification. Applicants should be aware that where requests are manifestly unfounded or excessive, in particular because they are repetitive, the Band can:
  - charge a reasonable fee taking into account the administrative costs of providing the information; or
  - refuse to respond.
- You have a right in certain circumstances to have inaccurate personal data rectified, blocked (restrict processing), erased (right to be forgotten), or destroyed.
- You have a right in certain circumstances to object to the processing of your personal data for such reasons as direct marketing, automated decision making, profiling; although we can confirm we make no decisions on you using an automated process.
- You have a right in certain circumstances to data portability.

In certain situations, these rights may not apply, for example if you are a valid member we will need to communicate with you about your membership and those services afforded to you as part of that membership; you hold a band office and we need to communicate with you in relation to that office, in which case you will not be able to unsubscribe from these communications.
We collect and process your personal data through legitimate interests or because you have provided it to us to enable us to deliver a service to you. We will only process your personal data as you would reasonably expect us to. You can opt out of our general member mailings at any time.
Finally, if you are unhappy with how we have processed your information, you have the right to lodge a complaint with the Office of the Information Commissioner, contact details below.

Changes to this privacy notice
We may change this privacy Notice from time to time. If we make any significant changes in the way we treat your personal information we will make this clear on our website www.northberwickpipeband.co.uk or by notifying you directly.

Our contact details
Hon. Secretary
North Berwick Pipe Band
18 St. Baldred's Road
North Berwick
East Lothian
EH39 4QB
Tel: 01620 894042
Email: secretary@northberwickpipeband.co.uk

Complaints
If you are unhappy with how we have processed your personal information, please firstly contact the Hon. Secretary, details above. Requests must be made in writing or email to the Band Secretary. If you are still unhappy you may contact the following:

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire, SK9 5AF
Helpline: 0303 123 1113 (local rate) or ++44 1625 545 745

[This Privacy Policy Notice was last reviewed and updated as detailed in the page footer]