

# WEAll Scotland Privacy Notice

## 1. Purpose of this Privacy Notice

The Wellbeing Economy Alliance Scotland (“WEAll Scotland”, “we”, “us” or “our”) takes the protection of your personal data seriously. This Privacy Notice explains how we use any personal information that you supply to us, or that might be collected from a third party, and sets out your rights in respect of our processing of your personal information.

In particular, this Notice explains:

- the kinds of personal information we collect about you;
- the means by which we obtain your personal information;
- the ways in which we use your personal information;
- the basis on which we use your personal information;
- the length of time that we keep your personal information;
- who we share your personal information with;
- how we protect your personal information; and
- where and why we transfer your personal information outside of the EU.

We may collect your personal data in your capacity as: official Ally, member of one of our networks (including, but not limited to, the Scottish Policymakers Network on a Wellbeing Economy and the Cross Party Group on Wellbeing Economy), partner in a project, donor or participant in our events or training sessions, subscriber to our mailing lists.

You provide your personal data to us on a voluntary basis. But without providing us with your personal data, you will be unable to (as appropriate) receive our regular update and events emails, join as an Ally or in one of our other networks, access our training courses, make a donation or apply for employment with us.

This Privacy Notice is intended to assist you in making informed decisions about your personal data. Please take a moment to read and understand it. We may update this Privacy Notice from time to time without notice to you, so please check it regularly.

## 2. About us

WEAll Scotland (Wellbeing Economy Alliance Scotland) is a Scottish charitable incorporated organisation. We are a collaboration of organisations, movements and individuals working to transform the economic system into one that delivers social justice on a healthy planet. We believe that our economy needs to be redesigned so it provides us with what matters most - dignity,

connection, nature, fairness and meaningful participation. We collaborate with a growing network of Allies across Scotland to drive change by changing the narrative, driving collaboration and advocating for wider policy change.

WEAll Scotland is the Scottish hub of the global Wellbeing Economy movement. The global movement is coordinated by the Wellbeing Economy Alliance (<https://weall.org/>). WEAll Scotland both legally and operationally a separate organisation from the global Wellbeing Economy Alliance, but we work closely together to achieve our goals.

WEAll Scotland is the data controller responsible for your personal information. We are registered in Scotland under charity number SC049174. Our registered address is 60 Duddingston Park, Edinburgh EH15 1JY.

### 3. How we collect your personal information

We may collect your personal information in the following ways:

#### (1) When you give it to us DIRECTLY

You may give us your personal data in various ways, including when you apply to join as an Ally, join one of our other networks, opt-in to receive our update emails on our general work or on specific projects, when you apply to participate in our events, when you share information on our Allies platform (currently a Slack channel), when you share information about our work on Facebook, Twitter and/or via email, when you contact us by phone, email or post, and/or when you donate money to us.

Please note that our website (<https://wellbeingeconomy.org/scotland>) is administered by the Wellbeing Economy Alliance. We receive your information if you sign up to our mailing list on the website or fill out the contact form. Any other information collected by the website is processed only by the Wellbeing Economy Alliance. You can find their Privacy Policy here:

<https://wellbeingeconomy.org/privacy-policy>

#### (2) When you give it to us INDIRECTLY

Your information may be shared with us by others including our strategic partners (including, among others, the (global) Wellbeing Economy Alliance), Allies and members of our other networks, business contacts, sponsors and supporters of our organisation. Your information will also be provided to us when you follow us or otherwise interact with us on or via Twitter, when you like and/or join a Facebook managed by us or interact with us in other ways on or via Facebook.

### (3) When you give permission to OTHER ORGANISATIONS to share it or it is AVAILABLE PUBLICLY

We may combine information you provide to us with information available from external publicly available sources. Depending on your privacy settings for social media services, we may also access information from those accounts or services. We use this information to gain a better understanding of our audience and to improve our communications, network facilitation, training and fundraising activities.

## 4. What information do we collect?

We may collect, store and use the following kinds of personal data:

- your name and contact details, including physical address, telephone number and e-mail address, and social media identity
- financial information, such as payment-related information, including bank details or debit/credit card details
- the information you add to your profile on our Allies' platform (currently a Slack Channel), and the posts you make on the platform, including reactions to other people's posts.
- other personal information we receive in the course of working with you, including details of why you have decided to contact us/join as an Ally/attend one of our events, details of events you have attended and your contributions during events, details of topics/areas of interest to you, responses to surveys you have completed, equal opportunities monitoring information and information about any health and disability-related requirements
- marketing information, including information about the services you use, services and products of interest to you or any marketing and/or communication preferences you give; and/or any other information shared with us as per paragraph 1 above.

### Do we process special categories of personal information?

Applicable law recognises certain categories of personal information as sensitive and therefore requiring more protection, including health information, ethnicity, trade union membership, religious beliefs, sexuality, and political opinions. We collect this type of data in the following circumstances:

- for our Allies application process, to monitor equal opportunities and the accessibility of our services;
- to ensure our provision is sensitive to health needs of participants;
- in the interests of positive action / anti-oppression, where we're running opportunities with limited places, if several candidates match our criteria equally, we may use this data to prioritise applications from members of underrepresented groups;

In other limited cases, we may collect sensitive personal data about you. We only collect

sensitive personal data if there is a clear reason for doing so; and only do so with your explicit consent.

## 5. How and why will we use your personal data?

We may use your personal information to:

1. Manage and administer our relationship with you, including providing you with services (such as enabling participation in our Allies network or other networks, projects, events and training), products and information you have requested,
2. Market our services, including sending you information about our projects, events, trainings, and any other information, products or services that we provide. We may do this by using marketing tools, such as Facebook marketing and by using personalisation to tailor and enhance your experience of our communications;
3. Administer payments;
4. Conduct research and data analysis into the impact of our work;
5. Deal with enquiries and complaints made by or about you relating us;
6. Deliver or administer events, projects, products, and information;
7. To carry out financial management and controls, including processing financial transactions and maintain financial controls; prevent fraud, misuse of services and money laundering; enforce legal claims; and report criminal acts and comply with law enforcement agencies;
8. Audit and/or administer our financial accounts and conduct other statutory reporting and regulatory compliance;
9. Maintain an Allies database, membership databases for other networks, and suppression lists;
10. Conduct member and supporter research;
11. Meet any other of our legal, regulatory and risk management obligations.

### Using our services

If you apply to join as an Ally, join one of our networks or participate in one of our projects or events, then we will process your personal information in order to provide that service to you and to monitor the effectiveness and reach of our services as described above.

We use Google G-suite applications and Monday.com to store and process your data, including, but not limited to Gmail, Gdrive, Google documents, Google Forms and Google contacts.

You can check Google's Privacy Policy here: <https://policies.google.com/privacy?hl=en>

And Monday.com's Privacy Policy here: <https://monday.com/l/privacy/privacy-policy/>

We use MailChimp to administer our core mailing list. You can find MailChimp's Privacy Policy here: <https://www.intuit.com/privacy/statement/>

We currently use a Slack channel as our Allies platform. You can find Slack's Privacy Policy here: <https://slack.com/intl/en-gb/trust/privacy/privacy-policy>

For some of our events we use Eventbrite to collect and process the information we need to provide the event. You can check Eventbrite's Privacy Policy here: [https://www.eventbrite.co.uk/support/articles/en\\_US/Troubleshooting/eventbrite-privacy-policy?lg=en\\_GB](https://www.eventbrite.co.uk/support/articles/en_US/Troubleshooting/eventbrite-privacy-policy?lg=en_GB)

**Supporter research:** We may use your personal information to undertake research to gather further information about you from publicly accessible sources (as per clause 1 above). This helps us to get a better understanding of your background, interests and preferences in order to improve our communications and/or interactions with you, to help ensure they are targeted to be relevant and appropriate, and to provide information (sometimes through third parties) about projects and other aspects of our work which we consider may be of interest to you.

**Marketing:** Where you have provided us with your physical address and appropriate consent, we may contact you by post. Where you have provided appropriate consent, we may also contact you by telephone and e-mail, with targeted communications to let you know about our events and/or activities that we consider may be of particular interest, about the work of the company and to ask for donations or other support.

## 6. Lawful processing

We are required to have one or more lawful grounds to process your personal information. We use your personal information on the following bases:

1. Personal information is processed on the basis of a data subject's consent
2. Personal information is processed on the basis of a contractual relationship
3. Personal information is processed on the basis of legal obligations
4. Personal information is processed on the basis of legitimate interests

### (1) Consent

We will ask for your consent to use your information to send you postal or electronic communications such as newsletters and marketing and fundraising emails and if you ever share sensitive personal information with us.

### (2) Contractual relationships

Most of our interactions are voluntary and not contractual. However, sometimes it will be necessary to process personal information so that we can enter contractual relationships with people. For example, if you apply for employment or to volunteer with us, or if you purchase something from us.

### (3) Legal obligations

Sometimes we will be obliged to process your personal information due to legal obligations which are binding on us. We will only ever do so when strictly necessary.

### (4) Legitimate interests

Applicable law allows personal information to be collected and used if it is reasonably necessary for our legitimate activities (as long as its use is fair, balanced and does not unduly impact individuals' rights). We will rely on this ground to process your personal data when it is not practical or appropriate to ask for consent.

When we use your personal information, we will consider if it is fair and balanced to do so and if it is within your reasonable expectations. We will balance your rights and our legitimate interests to ensure that we use your personal information in ways that are not unduly intrusive or unfair in other ways.

## 7. Children's data

Our services are not aimed at children and we do not knowingly process data of any person under the age of 18. If we come to discover, or have reason to believe, that you are under 18 and we are holding your personal information, we will delete that information within a reasonable period and withhold our services accordingly.

## 8. Other disclosures

In addition to the disclosures reasonably necessary for the purposes identified elsewhere in this Privacy Notice, we will disclose your information to regulatory and/or government bodies and/or law enforcement agencies upon request only when absolutely necessary to do so in order to satisfy legal obligations which are binding on us.

## 9. Security of and access to your personal data

We endeavour to ensure that there are appropriate and proportionate technical and organisational measures to prevent the loss, destruction, misuse, alteration, unauthorised disclosure or of access to your personal information.

Your information is only accessible by appropriately trained staff and contractors, apart from information you voluntarily share on our Allies' platform (currently a Slack channel). We may also use agencies and/or suppliers to process data on our behalf. We may also merge or partner with other organisations and in so doing transfer and/or acquire personal data.

Please note that some countries outside of the EEA have a lower standard of protection for personal data, including lower security requirements and fewer rights for individuals. We may transfer and/or store personal data collected from you to and/or at a destination outside the European Economic Area (“EEA”). Such personal data may be processed by agencies and/or suppliers operating outside the EEA. If we transfer and/or store your personal data outside the EEA we will take reasonable steps to ensure that the recipient implements appropriate measures to protect your personal data.

Otherwise than as set out in this Privacy Notice, we will only ever share your data with your informed consent.

## 10. Your rights

Where we rely on your consent to use your personal information, you have the right to withdraw that consent at any time. This includes the right to ask us to stop using your personal information for direct marketing purposes or to be unsubscribed from our email list at any time. You also have the following rights:

1. Right to be informed – you have the right to be told how your personal information will be used. This Privacy Notice and other policies and statements used on our website and in our communications are intended to provide you with a clear and transparent description of how your personal information may be used.
2. Right of access – you can write to us to ask for confirmation of what information we hold on you and to request a copy of that information. Provided we are satisfied that you are entitled to see the information requested and we have successfully confirmed your identity, we will have 30 days to comply.
3. Right of erasure – you can ask us for your personal information to be deleted from our records. In many cases we would propose to suppress further communications with you, rather than delete it.
4. Right of rectification – if you believe our records of your personal information are inaccurate, you have the right to ask for those records to be updated.
5. Right to restrict processing – you have the right to ask for processing of your personal data to be restricted if there is disagreement about its accuracy or legitimate usage.
6. Right to data portability – to the extent required by the General Data Protection Regulations (“GDPR”) where we are processing your personal information (i) under your consent, (ii) because such processing is necessary for the performance of a contract to which you are party or to take steps at your request prior to entering into a contact or (iii) by automated means, you may ask us to provide it to you – or another service provider – in a machine-readable format.

To exercise these rights, please send a description of the personal information in question using the contact details in section 14 below. To unsubscribe from our email lists or remove your data from our Allies’ platform please email [hello@scotland.weall.org](mailto:hello@scotland.weall.org) with your request.

Where we consider that the information with which you have provided us does not enable us to identify the personal information in question, we reserve the right to ask for (i) personal identification and/or (ii) further information.

Please note that some of these rights only apply in limited circumstances. For more information on your rights as a data subject, please consult guidance from the Information Commissioner's Office ("ICO"). – <https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/> – or please contact us using the details in section 13 below.

You are further entitled to make a complaint about us or the way we have processed your data to the ICO. For further information on how to exercise this right, please see the guidance at <https://ico.org.uk/for-the-public/personal-information>.

The contact details of the ICO can be found here: <https://ico.org.uk/global/contact-us/>.

## 10. Data retention

In general, unless still required in connection with the purpose(s) for which it was collected and/or is processed, we remove your personal information from our records six years after the date it was collected. However, if before that date (i) your personal information is no longer required in connection with such purpose(s), (ii) we are no longer lawfully entitled to process it or (iii) you validly exercise your right of erasure, we will remove it from our records at the relevant time. In the event that you ask us to stop sending you direct marketing/fundraising/member/other electronic communications, we will keep your name on our internal suppression list to ensure that you are not contacted again.

## 11. Policy amendments

We keep this Privacy Notice under regular review and reserve the right to update it from time-to-time by posting an updated version on our website, not least because of changes in applicable law. We recommend that you check this Privacy Notice occasionally to ensure you remain happy with it. We may also notify you of changes to our Privacy Notice by email.

## 12. Updating information

You can check the personal data we hold about you, and ask us to update it where necessary, by emailing us at [hello@weall.scotland.org](mailto:hello@weall.scotland.org).



## 13. Contact

We are not required by law to have a “Data Protection Officer” – however compliance with data protection regulation is the responsibility of the Director. If you have any queries or concerns whatsoever about the way in which your data is being processed, or want to exercise your privacy rights, please contact us by:

- sending an e-mail to [hello@weall.scotland.org](mailto:hello@weall.scotland.org) or
- writing to us at: Director, WEAll Scotland, 60 Duddingston Park, Edinburgh EH15 1JY