

A Bear Named Buttony (SCIO) SC049781

GDPR

Fair Processing Notice

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(How we use your personal information)

This notice explains what information we collect, when we collect it and how we use this. During the course of our activities, we will process personal data (which may be held on paper, electronically, or otherwise) about you and we recognise the need to treat it in an appropriate and lawful manner. The purpose of this notice is to make you aware of how we will handle your information.

Who are we?

A Bear Named Buttony (SCIO) is a Scottish Charity, SC049781 regulated by the Scottish Charity Regulator. (“we” or “us” or “the charity”) take the issue of security and data protection very seriously and strictly adhere to guidelines published in the the General Data Protection Regulation (EU) 2016/679 applicable from the 25 May 2018 and lately in the Data Protection Act of 2018 together with any domestic laws subsequently enacted.

Our trustee Jennifer Gow is notified as a data controller with the Information Commissioner's Office (ICO) under registration number **[ZA617176]** and is the data controller of any personal data that you provide to us.

Any questions relating to this notice and our data practices should be sent to **Jennifer Gow at 28 Pannanich Road Ballater AB35 5PA or info@buttonybear.com.**

How we collect information from you

We collect information about you directly, for example:

- when you request products or services, volunteer, make a donation, fundraise or otherwise provide us with your personal details;

We collect information from you indirectly, for example:

- through subcontractors and business partners acting on our behalf who provide us with payment, online donation and delivery services.
- When you interact with us on social media platforms such as Facebook and Twitter we may obtain information about you (for example, when you publicly tag us in an event photo). The information we receive will depend on the privacy preferences you have set on those types of platforms.

What type of information is collected from you?

The personal information we collect, store and use might include:

- your name and contact details (including postal address, email address and telephone number);
- your date of birth;
- still images or video which include you
- information about your activities on our website and about the device used to access it, for instance your IP address and geographical location;
- your bank or credit card details. If you make a donation online or make a purchase, your card information is not held by us, it is collected by our third party payment processors, who specialise in the secure online capture and processing of credit/debit card transactions;
- information as to whether you are a UK taxpayer so we can claim gift aid; and
- any other personal information shared with us.

Data protection laws recognise certain categories of personal information as sensitive and therefore requiring greater protection, for example information about your health, ethnicity and religion.

We may from time to time ask you information about your health to ensure we provide you with the most appropriate products and services. Where appropriate, we will make it clear why we are collecting this type of information and what it will be used for. Whenever we do request this information you are required to provide us with explicit consent which you may withdraw at any time by contacting us. Please see 'Your rights' towards the end of this document and how to exercise them.

We receive the following information from third parties:

- payments made by you to the charity;

Why we need this information about you and how it will be used

We need your information and will use your information:

- when you have provided specific consent to us using your personal information in a certain way, such as to send you e-mail, text and/or telephone information, and/or to enable us to supply you with the services and information which you have requested;
- where we are entering into a contract with you or performing our obligations under it.
- for all other purposes consistent with the proper and lawful performance of our charity's operations.

Each piece of personal data that we process must have a legal basis. References to the legal basis for processing of your personal data are a reference to the General Data Protection Regulation.

General Enquiries and Communication

To deal with general enquiries and requests for any of our products and services you can call us, email us, or contact us via our website or social media platforms and we will follow up on your enquiry to understand if we can help you.

The basis for us processing your data is your consent for us to do so.

Buttony Bear

If you request one of our bears, we will ask you to choose by 'type of surgery' – this relates to the adjustments made to the bear and does not relate to any surgery that the recipient may or may not have had. To enable our compliance with UK Conformity Assessment (UKCA) regulations we will ask for, and store, your name and address together with the type of bear which you have requested. This information will be held for up to 10 years to comply with regulation.

The basis for us processing your data is legal obligation. For more information about our obligation to comply with UKCA marking visit <https://www.gov.uk/guidance/using-the-ukca-marking>

Products and Services

If your enquiry or request for our products or services requires us to know the type of surgery you have had, we will need your explicit consent to process any of your medical information. We may request this information to ensure the products and services we make available to you are appropriate. We do so without giving any advice as to product suitability.

The basis for us processing your data is you have given explicit consent to the processing of your personal data that reveals your health. You have the right to withdraw this consent at any time by contacting us.

Marketing

If you request any of our marketing information (e.g. charity communications, newsletters) we will ask you how you wish to receive this information. You can choose how you would like to receive this information from the channels on offer at the time (e.g. post, email, SMS), .

The basis for us processing your data is your consent for us to do so. You understand that you can withdraw consent for any or all types of communication either by using an unsubscribe option (where available) or by contacting us. This does not apply if we are contacting you to keep you up to date with progress of your enquiry or to ask for additional information.

Sharing of your information

The information which you provide to us will be treated by us as confidential and will be processed only by us and any third party, acting on our behalf, in accordance with UK data protection regulation. We may disclose your information to other third parties who act for us for the purposes set out in this notice or for purposes approved by you, including the following:

- if we are investigating a complaint, information may be disclosed to regulatory authorities and others involved in any complaint
- if we are investigating payments made, your information may be disclosed to payment processors,;
- for the purposes of taxes, for example gift aid, your information may be disclosed to HMRC;
- For the purpose of providing you with our products and services which may be in conjunction with one of our agreed third party suppliers;

Unless required to do so by law, we will not otherwise share, sell or distribute any of the information you provide to us without your consent.

Transfers outside the UK and Europe

Your information will only be stored within the UK and the European Economic Area. (EEA)

Security

When you give us information we take steps to make sure that your personal information is kept secure and safe. Those steps are shown in our Privacy Policy.

How long we will keep your information

We review our data retention periods regularly and will only hold your personal data for as long as is necessary for the relevant activity, or as required by law (we may be legally required to hold some types of information), or as set out in any relevant contract we have with you. Our data retention periods are shown in Appendix 2 to our privacy policy.

Your rights

You have the right at any time to:

- ask for a copy of the information about you held by us in our records;
- require us to correct any inaccuracies in your information;
- make a request to us to delete what personal data of yours we hold where
 - we no longer need it or no longer have a legitimate reason to process your personal data
 - we are processing your personal information by consent and you withdraw consent; and
- object to receiving any marketing communications or selecting to unsubscribe from marketing communication that you have previously consented to receive from us.

You understand that by exercising your rights to discontinue processing your personal information, it may not be possible for us to withdraw use of your name, image and any personal information to which you have consented at the time where it has been published in printed format and already distributed in accordance with agreed use at the time. Where practically possible we will discontinue use and distribution of your personal information in printed format from the point at which you withdraw consent and where it is yet to be distributed by us

If you would like to exercise any of your rights above please contact us at **info@buttonybear.com**

Should you wish to complain about the use of your information, we would ask that you contact us to resolve this matter in the first instance. You also have the right to complain to the ICO in relation to our use of your information. The ICO's contact details are noted below:

The Information Commissioner's Office – Scotland
45 Melville Street, Edinburgh, EH3 7HL
Telephone: 0131 244 9001
email: scotland@ico.org.uk

The accuracy of your information is important to us - please help us keep our records up-dated by informing us of any changes to your email address and other contact details.