

CROMARTY HARBOUR TRUST

The Harbour, CROMARTY IV11 8YN
VAT Reg No GB 743 1486 35

“A friendly, flexible, safe working harbour open to visitors and locals”

Privacy Notice

The privacy notice for Cromarty Harbour Trust (CHT) explaining how CHT deals with personal information that it collects and uses for its own purposes.

 Updated 26 Jan 2020

This is the privacy notice for the CHT explaining how CHT deals with personal information that it collects and uses for its own purposes. This privacy notice is available online or on request from info@cromartharbour.org.

INTRODUCTION

Welcome to the privacy notice for the CHT.

CHT respect your privacy and are committed to protecting your personal information (**personal data**). This privacy notice lets you know how we look after your **personal data** which either you provide to us or we obtain and hold about you and it tells you about your **privacy rights** and **how the law protects you**.

This privacy notice is available online and can be downloaded or printed as required. Please also use the Glossary to understand the meaning of some of the terms used in this privacy notice.

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1. IMPORTANT INFORMATION AND WHO WE ARE

PURPOSE OF THIS PRIVACY NOTICE

This privacy notice aims to give you information on how CHT collect and **process** your **personal data** which either you provide to us or we obtain and hold about you through your use of our websites (including any data you may provide when you subscribe to receive updates through the News Hub or contact us using the online contact form) or through other interactions with CHT (including any data that you provide when you contact us for guidance, ask us to make payments, ask us to liaise with professionals on your behalf or in the case of members of staff and volunteers of CHT, when you perform services for us).

It is important that you read this privacy notice together with any other privacy notice or fair processing notice we may provide on specific occasions when we are collecting or dealing with **personal data** about you (e.g. employment privacy notices) so that you are fully aware of how and why we are using your data. This privacy notice supplements the other notices and is not intended to override them.

CONTROLLER

Trustees for CHT is the controller and responsible for your personal data (collectively referred to as CHT, “we”, “us” or “our” in this privacy notice).

We have appointed a data privacy manager who is responsible for overseeing questions in relation to this privacy notice. If you have any questions about this privacy notice, including any requests to exercise your legal rights, please contact the data privacy manager using the details set out below.

CONTACT DETAILS

If you have any questions about this privacy notice or our privacy practices, please contact our data privacy manager in the following ways:

Full name of legal entity:	Cromarty Harbour Trust
Postal address:	The Manse Denny Road Cromarty IV11 8YT
Name of Data Privacy Manager:	Colin Dickie
Telephone number:	01381 600596
Email:	info@cromartyharbour.org
Web:	www.cromartyharbour.org

You have the right to make a complaint at any time to the Information Commissioner’s Office (ICO), the UK supervisory authority for data protection issues (www.ico.org.uk). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

CHANGES TO THE PRIVACY NOTICE AND YOUR DUTY TO INFORM US OF CHANGES

We keep our privacy policy as set out in this privacy notice under regular review.

We have the right to update and amend the provisions of this notice to ensure continual compliance with data protection legislation. We will provide you with copies of the new notice wherever it is practically possible to do so but please check the online notice regularly to see if any updates have been made. It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

THIRD-PARTY LINKS

Our websites may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our websites, we encourage you to read the privacy policy of every website you visit.

2. THE DATA WE COLLECT ABOUT YOU

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

We may collect, use, store personal data about our Trustees, volunteers, harbour users, visitors to our harbour, individuals who provide services to us, agencies that we work with, those you kindly donate to us and individuals who contact us. We have grouped the different kinds of personal data together as follows:

- **Administrative Data** includes details about you included in minutes taken at Trustee and Harbour Management Group meetings and external meetings; invoices; supplier and contractor details; customer or client details, and back-up files e.g. something that you said in a meeting that could identify you.
- **Contact Data** includes home address, email address and telephone numbers e.g. information used to contact you.
- **Correspondence Data** includes information and opinions expressed in correspondence that you enter into with us via our website contact functions, email, post, form completion and records of telephone conversations with us.
- **Expenses Data** includes details of expenses claimed by you and payments made to you including those relating to out of pocket expenses relating to attendance at meetings and events.
- **Financial Data** includes bank account and payment card details.
- **Identity Data** includes first name, maiden name, last name, username or similar identifier, marital status, title, date of birth, signature and gender including any copy ID documents that you may provide to us from time to time, e.g. insurance documents.
- **Image Data** includes photographs taken of you where it is possible to identify you e.g. portraits of employees and Board members on our websites, images of you caught by any CCTV or similar devices at our premises and images of you taken to be used in training videos, webinars or promotional materials.
- **Marketing and Communications Data** includes your preferences in receiving information from us about CHT and our third parties and your communication preferences.
- **Member Data** includes details of your involvement in CHT including any offices held, other duties and roles that you may carry out in relation to CHT and, where relevant, biographical information, including qualifications
- **Official Records** includes lists of Trustees, Management Group, minutes of meetings, records of inspection of CHT premises and lists of visitors to the Harbour.
- **Recruitment Data** includes information relating to candidates for paid and unpaid roles with CHT including CVs, application letters and forms, interview records and score sheets.

- **Special Categories of Data** includes your race or ethnicity, your religious beliefs, sex life, sexual orientation, information about your health, also information about criminal convictions and offences in keeping with the Safeguarding Policy of the CHT (if applicable).
- **Tax Data** includes national insurance numbers and other information that may be required by HMRC relating to tax related payments and receipts.
- **Technical Data** includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access our website or social media operated by us or our suppliers.
- **Transaction Data** includes details about payments to and from you and personal information contained in deeds and documents relating to transactions e.g. sales, purchases, tenancies, leases and licences that you enter into with us relating to premises.
- **Usage Data** includes information about how you use our website, products and services.

We also collect, use and share **Aggregated Data** such as statistical or demographic data for any purpose. Aggregated Data could be derived from your personal data but is not considered personal data in law as this data will not directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy policy.

IF YOU FAIL TO PROVIDE PERSONAL DATA

Where we need to collect personal data by law, or under the terms of a contract we have with you and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with accommodation under a tenancy agreement or process berthing payments). We will notify you if this is the case at the time.

3. HOW YOUR PERSONAL DATA IS COLLECTED

We use different methods to collect data from and about you including through:

- **Direct exchanges.** You may choose to provide personal information to us direct e.g. by speaking to us over the telephone, in person, by corresponding with us by post, phone, email, through the online contact form or otherwise. This includes personal data you provide when you:
 - apply for paid or voluntary roles with us;
 - or enter into contracts with us to provide services;
 - or sign up to receive notifications from us;
 - complete forms including update forms and expense forms; provide identification documents;
 - or otherwise contact us.
- **Automated technologies or interactions.** As you interact with our website, we will automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, server logs and other similar technologies. Please see our cookie policy when this is available.
- **Third parties or publicly available sources.** We may receive personal data about you from various third parties and public sources as set out below:
 - Other harbours;

- Credit agencies;
- Local authorities;
- Members of the public who contact us from time to time;
- Recruiters;
- Identity and Contact Data from publicly available sources such as Companies House, the Charity Commission and the Electoral Register.

4. HOW WE USE YOUR PERSONAL DATA

FAIR PROCESSING

We take our obligations under data protection law (including the General Data Protection Regulation (GDPR) and the Data Protection Act 2018) seriously. We keep personal data as up to date as possible and take active steps to rectify any personal data we find to be incorrect. We store and destroy personal data securely and do not collect or retain personal data which is in excess of our processing activities. We take steps to protect all personal data (including **Special Category Data**) from loss, misuse, unauthorised access and disclosure by ensuring that appropriate measures are in place to protect personal data.

We ensure that personal data is processed in accordance with the principles of the GDPR and is processed:

- Lawfully, fairly and in a transparent manner;
- For specified, explicit and legitimate purposes and not processed in a manner which is incompatible with those purposes;
- Accurately, relevantly and limited to what is necessary in relation to the purposes for which it is processed;
- Kept accurate and where necessary kept up to date, with all reasonable steps being taken to ensure that all inaccurate data is erased or rectified without delay;
- Is not kept longer than is necessary for the purposes for which the personal data is processed; and In a manner that ensures appropriate security of the Personal Data including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage by using appropriate technical and organisational measures.

HOW WE USE YOUR DATA

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- Where it is necessary for our **legitimate interests** (or those of a third party) and your interests and fundamental rights do not override those interests.
 - **Legitimate interests** mean our interests in running our business and providing support to Trustees and Harbour Management Group to meet our obligations as a harbour operator. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by contacting our [Data Privacy Manager](#).
- Where we need to perform the contract, we are about to enter into or have entered into with you.

- **Performance of Contract** means processing your personal data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract including employment contracts.
- Where we need to comply with a legal or regulatory obligation.
- **Comply with a legal or regulatory obligation** means processing your personal data where it is necessary for compliance with a legal or regulatory obligation that we are subject to.

In rare cases we may need to use your personal data in the following circumstances:

- Where we need to protect your **vital interests** e.g. in an emergency life or death situation where the emergency services are called to treat you when you are with us.
 - Vital interests means where it is necessary to use your personal data to protect your "vital interests" or those of another person (such as a child) in a life-or-death situation.
- Where we need to perform a task carried out in the public interest e.g. in certain safeguarding situations.

Refer to the Lawful bases for processing at the ICO's website to find out more about the types of lawful basis that we will rely on to process your personal data.

Generally, we do not rely on consent as a legal basis for processing your personal data other than to legitimise dealing with **Special Category Data**. You have the right to withdraw consent at any time by contacting the [Data Privacy Manager](#) although this will not prevent processing where the law allows us to process for a different reason in addition to consent.

SPECIAL CATEGORY DATA

Where data processing relates to **Special Categories of Data** (e.g. health information included in your employment records or dietary requests) the following processing conditions apply in addition to the legal basis identified in the table in the Annex to this privacy notice:

- **Explicit Consent** has been given by the data subject;
- Processing is necessary for carrying out obligations under employment, social security or social protection law, or a collective agreement;
- Processing is carried out by a not for profit body with a religious aim provided:
 - the processing relates to member or former members (or those who have regular contact with it in connection with those purposes; and there is no disclosure to a third party without consent;
- Processing is necessary for the establishment, exercise, defence of legal claims or where the courts are acting in their judicial capacity; or
- Processing is necessary for archiving purposes in the public interest, scientific and historical research purposes or statistical purposes.

PURPOSES FOR WHICH WE WILL USE YOUR PERSONAL DATA

We have set out in detail in the [Annex](#) to this privacy notice, in a table format, a description of the main ways we plan to use your personal data, and which of the **legal bases** we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please [contact us](#) if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table in the [Annex](#).

NOTIFYING YOU ABOUT EVENTS

We like to notify you about upcoming events including what is happening at the harbour, to issue you with regular updates using, inter alia, Harbour Matters, tell you about fundraising activities so that you can play as much of a role in the life of the Cromarty Harbour as you choose from time to time. Most of the time we will let you know about such opportunities on the basis that we have a legitimate interest in doing so.

If we decide to contact you by email or telephone where you are registered with the telephone preference service we will provide you with choices as required to do so under data protection legislation and the [Privacy and Electronic Communications Regulations 2003](#) (PECR).

THIRD-PARTY MARKETING

We will get your express opt-in consent before we share your personal information with any third party for marketing purposes.

OPTING OUT

You can ask us or third parties to stop sending you marketing messages (e.g. messages about CHT events) by following the opt-out links on any marketing messages sent to you or by contacting us at any time.

Where you opt out of receiving these marketing messages, this will not apply to personal data provided to us as a result of services provided to you e.g. although the marketing messages will be stopped we may still need to use your personal information for other purposes relating to your engagement with us, guidance we provide to you and transactional issues etc.

COOKIES

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of our websites may become inaccessible or not function properly. For more information about the cookies we use, please refer to the information available from www.aboutcookies.org.uk or see our cookie policy when it is available.

CHANGE OF PURPOSE

We will only use your personal data 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 you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact our [Data Privacy Manager](#).

If we need to use your personal data 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 data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

5. DISCLOSURES OF YOUR PERSONAL DATA

SHARING PERSONAL DATA

We may share your personal data with the parties set out below for the purposes set out in the table in the Annex.

- External third parties such as:

- Professional advisers including lawyers, surveyors, bankers, auditors and insurers based in the UK who provide legal, employment/HR, surveying, consultancy, banking, insurance and accounting services to CHT or internal third parties.
- Estate agents who may provide advice and administrative support in relation to transactional matters and ongoing residential tenancy matters.
- HM Revenue & Customs, regulators and other authorities based in the United Kingdom who require reporting of processing activities in certain circumstances including the Charity Commission and Information Commissioners Office.
- Recruiters.
- IT support services including those who provide development, advice, support and any external storage for our Websites, case management system and other databases that we might use.
- Providers of office equipment containing hard drives such as the photocopier and franking machine.

We will ask all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow third parties to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

6. TRANSFER of Personal Data outside of the European Economic Area ('EEA')

We may at times transfer and process personal data outside of the EEA. This is particularly relevant in relation to transactions, trust matters and data protection issues on the Channel Islands and Isle of Man.

However, storing, publishing or transmitting personal data via the internet, (this includes by email), is not completely secure and therefore whilst we take all reasonable and necessary precautions to protect personal data from unauthorised access, you acknowledge that there is a risk that your personal data may be transferred and accessed outside of the EEA.

7. DATA SECURITY

We implement reasonable and appropriate security measures against unlawful or unauthorised processing of personal data and against the accidental loss of, or damage to, personal data in accordance with our internal data security policy. In addition, we limit access to your personal data to Trustees and members of the Harbour Management Group who have a need to know. They will only process your personal data on our instructions, and they are subject to a duty of confidentiality.

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

8. DATA RETENTION

HOW LONG WILL YOU USE MY PERSONAL DATA FOR?

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements. We may retain

your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

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, and the applicable legal requirements.

Full details of retention periods for data processed by us can be found in our retention policy which you can request from us by contacting us using the [contact details](#) in this privacy notice.

In some circumstances you can ask us to delete your data: see [Section 9](#) and details about [Request Erasure](#) below for further information.

In some circumstances we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

9. YOUR LEGAL RIGHTS

Unless personal data is subject to an exemption under GDPR, such as it is subject to the prevention, investigation, detection or prosecution of a criminal offence, you have the following rights with regards to your personal data:

- Where **consent** is used as the legal basis for processing personal data, you have the *right to withdraw consent* to the data processing at any time. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent or processing carried out using an alternative legal basis such as **performance of a contract** or **legal obligation**;
- The *right to request a copy* of the personal data which we hold about you (commonly known as a “data subject access request”). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it. If you would like to exercise this right, then please complete the relevant [Data Subject Access Form](#) and forward to the [Data Privacy Manager](#); The right to request that we *correct* any Personal Data which is found to be inaccurate. Note that we may need to verify the accuracy of the new data you provide to us;
- The right to request that we *erase* any Personal Data where there is no good reason for us continuing to process it. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request;
- Where consent or the performance of a contract is used as the legal basis for processing Personal Data, you have the right to **request the transfer** of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you and this right is unlikely to apply to personal data held by us.
- The right to request for a *restriction* on data processing. This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data’s accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it;

- Where legitimate interest is used as the legal basis for processing Personal Data, you have the right to *object* to the processing of personal data where there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. Note that in some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms; and
- The right to *lodge a complaint* with the Information Commissioners Office (ICO).

Contacting the ICO

Further information, guidance and advice is available from the ICO at:

Information Commissioner's Office

Wycliffe House

Water Lane

Wilmslow

Cheshire

SK9 5AF

Tel: 0303 123 1113

Web: <https://ico.org.uk/global/contact-us/>

If you wish to exercise any of the rights set out above, please contact the [Data Privacy Manager](#).

NO FEE USUALLY REQUIRED

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your 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 your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

TIME LIMIT TO RESPOND

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

10. GLOSSARY

“**controller**” is the controller described in Section 1 of this privacy notice.

“**data subject**” is a living, identified or identifiable individual about whom personal data is held. e.g. our users, volunteers and third parties such as community groups and tenants who use our premises and other third parties.

“**explicit consent**” is a very clear and specific statement of consent.

"**GDPR**" means the General Data Protection Regulation ((EU) 2016/679). Personal data is subject to the safeguards specified in the GDPR.

"**lawful bases**" are the five lawful grounds on which we can lawfully process personal data set out under Article 6 of GDPR. The lawful basis or bases on which we rely are set out under Section 4 of this privacy notice.

"**Trustees**" means the trustees of Cromarty Harbour Trust from time to time.

"**personal data**" is any information identifying a living individual or information relating to an individual that can be identified from that information/data (alone or in combination with other information in your hands or that can reasonably be accessed). Personal Data can be factual (for example, a name, email address, location or date of birth) or an opinion about that person's actions or behaviour. Personal information includes an individual's name, address, date of birth, telephone number, email address, a photograph or disability, health or ethnicity data.

"**Processing**" "**processed**", or "**process**" means any activity that involves the use of personal data. It includes obtaining, recording or holding the data, or carrying out any activity or set of activities on the data including organising, amending, retrieving, using, disclosing, erasing or destroying it. Processing also includes transmitting or transferring personal data to third parties. E.g. fulfilling obligations under an employment contract with you or responding to an enquiry that you raised with us.

"**Website**" means the website that we run at <https://www.cromartyharbour.org>.

11. ANNEX

Purposes for which we will use your personal data

Purpose/Activity	Type of data <i>Please refer to Section 2 for confirmation of what details these categories of data include</i>	Lawful basis for processing including basis of legitimate interest
A(1) Administration – General To administer our office, volunteers and trustees, suppliers, customers, including managing and maintaining our premises, facilitating meetings, keeping accounts and tax records, taking audits and recording decisions reached at meetings.	(a) Administrative (b) Contact (c) Identity (d) Financial (e) Tax (g) Technical	(a) Necessary for our legitimate interests in being able to meet our regulatory obligations (b) Performance of a contract with you (c) Necessary to comply with a legal obligation
A(2) Administration - Website	(a) Administrative (b) Contact (c) Image	(a) Necessary for our legitimate interests in being able to meet our regulatory obligations

<p>To administer, run and protect our website including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data and notifications feature and enabling you to contact us through the website</p>	<p>(d) Identity (e) Marketing and Communications (f) Member and Group (g) Technical</p>	
<p>A(3) Administration - Controller To manage and administer our role as controller including dealing with requests made by data subjects e.g. subject access requests</p>	<p>(a) Administrative (b) Contact (c) Identity (c) Member and Group (d) Official Records (e) Special Category (e.g. health or safeguarding issues that might be raised in a subject access request) (f) Transaction</p>	<p>(a) Necessary for our legitimate interests (for fulfilling the duties placed on us as controller and point of contact with the ICO, helping Trustees and approved volunteers to deal with subject access requests and other data subject rights) (b) Necessary to comply with a legal obligation</p>
<p>B(1) Contact - Internal To contact you and circulate information relating to internal matters including the Trustees and, where necessary, volunteers.</p>	<p>(a) Contact (b) Correspondence (c) Employment (d) Identity (e) Marketing and Communications (f) Member and Group (g) Technical (h) Transaction</p>	<p>(a) Necessary for our legitimate interests (to process payment, to deal with enquiries or forward information from third parties relating to property, to provide support and guidance to you and notify you about things which may be of interest to you to help you in your engagement with CHT.</p>
<p>B(2) Contact – Wider To contact you and circulate information about CHT matters and other matters that you are involved in as a Trustee, volunteer or user. To contact, update and notify you</p>	<p>(a) Contact (b) Correspondence (c) Employment (d) Identity</p>	<p>(a) Necessary for our legitimate interests (to process payment, to deal with enquiries or forward information from third parties relating to property, to notify you about things which may be of interest to you in your engagement with CHT.</p>

<p>about events and changes to the law including changes/updates to CHT policy and best practice where you have signed up to updates through our websites or otherwise.</p>	<p>(e) Marketing and Communications</p> <p>(f) Member and Group</p> <p>(g) Technical</p> <p>(h) Transaction</p>	
<p>C</p> <p>Correspondence</p> <p>To contact you to respond to/deal with enquiries that you or others within and outside the CHT have raised, to provide guidance.</p>	<p>(a) Contact</p> <p>(b) Correspondence</p> <p>(c) Employment</p> <p>(d) Identity</p> <p>(e) Marketing and Communications</p> <p>(f) Member and Group</p> <p>(g) Special Category (e.g. health or safeguarding issues that might be raised in incoming correspondence)</p> <p>(h) Transaction</p>	<p>(a) Necessary for our legitimate interests (for being able to meet our obligations to you).</p>
<p>D</p> <p>HR Management</p> <p>To administer and manage our relationship with our employees including keeping and maintaining records of staff development, carrying out reviews and appraisals, dealing with employment issues including disciplinary issues, absence, illness and requests for changes in working patterns and supporting our employees generally.</p>	<p>(a) Administrative</p> <p>(b) Contact</p> <p>(c) Employment</p> <p>(d) Financial</p> <p>(e) Identity</p> <p>(f) Image</p> <p>(g) Recruitment</p> <p>(h) Special Category (e.g. health and disciplinary information)</p> <p>(i) Tax</p>	<p>(a) Necessary for our legitimate interests (fulfilling employer responsibilities and looking after our employees)</p> <p>(b) Performance of a contract with you</p> <p>(c) Necessary to comply with a legal obligation</p>
<p>E</p> <p>Lists</p>	<p>(a) Contact</p> <p>(b) Employment</p>	<p>(a) Necessary for our legitimate interests (to operate as an organisation, keep our records</p>

<p>To keep and maintain records of:</p> <p>(a) contact details for Trustees, volunteers, employees, users, suppliers and others within and associated with the CHT</p> <p>(b) roles held by you within CHT</p> <p>(c) members of internal and external committees</p> <p>(d) attendance at training and other events that we may organise from time to time and those who have completed training.</p> <p>(e) bank details where payments are made to individuals</p>	<p>(c) Identity</p> <p>(d) Member and Group</p> <p>(e) Official Records</p> <p>(f) Recruitment</p>	<p>updated, study how our user base changes over time, identify the needs of the communities in which we operate and support our stakeholders).</p>
<p>F</p> <p>Payments</p> <p>Making payments to your bank account including to pay staff wages and other employment related benefits, to pay invoices, grants and fulfil payment requests, to reimburse you for expenses incurred by you and obtaining, keeping and maintaining records of your account details to facilitate payments.</p>	<p>(a) Contact</p> <p>(b) Employment</p> <p>(c) Identity</p> <p>(d) Financial</p> <p>(e) Transaction</p>	<p>(a) Necessary for our legitimate interests (for fulfilling our responsibilities and reimbursing people for out of pocket expenses).</p> <p>(b) Performance of a contract with you</p> <p>(c) Necessary to comply with a legal obligation</p>
<p>G</p> <p>Record keeping</p> <p>To keep and maintain records including charity records, correspondence and guidance given, discussions and decisions reached including grants given and applications considered, property and financial transactions, trustee decisions, ID records for Bank etc. and usage of our Websites.</p>	<p>(a) Contact</p> <p>(b) Correspondence</p> <p>(c) Financial</p> <p>(d) Identity</p> <p>(e) Official Records</p> <p>(f) Tax</p> <p>(g) Transaction</p> <p>(h) Usage</p>	<p>(a) Necessary for our legitimate interests (for keeping official records of decisions and running our business).</p> <p>(b) Performance of a contract with you</p> <p>(c) Necessary to comply with a legal obligation</p>

<p>H</p> <p>Recruitment</p> <p>To administer applications for job vacancies including the interview process and keeping and maintaining records of applicants and the recruitment process e.g. interview notes and scores.</p>	<p>(a) Contact</p> <p>(b) Identity</p> <p>(c) Employment</p> <p>(d) Financial</p> <p>(e) Recruitment</p> <p>(f) Special Category (e.g. health information)</p>	<p>(a) Necessary for our legitimate interests (for being able to run our business and filling job vacancies).</p>
<p>I</p> <p>Security</p> <p>To record and use images.</p>	<p>(a) Image</p> <p>(b) Identity</p>	<p>(a) Necessary for our legitimate interests (to keep our premises and our users, volunteers, employees and third parties secure)</p>

Version 1.1