



GENERAL DATA PRIVACY REGULATIONS
MAY 2018

DATA PRIVACY NOTICE

BACKGROUND:

North Highland Regeneration Fund understands that your privacy is important to you and that you care about how your personal data is used. We respect and value the privacy of all of our customers and will only collect and use personal data in ways that are described here, and in a way that is consistent with our obligations and your rights under the law.

1. Information About Us

North Highland Regeneration Fund

A company limited by guarantee, registered in Scotland under company number SC301805.

Registered address: D2003, Dounreay, Thurso KW14 7TZ

2. What Does This Notice Cover?

This Privacy Information explains how we use your personal data: how it is collected, how it is held, and how it is processed. It also explains your rights under the law relating to your personal data.

3. What is Personal Data?

Personal data is defined by the General Data Protection Regulation (EU Regulation 2016/679) (the "GDPR") as 'any information relating to an identifiable person who can be directly or indirectly identified in particular by reference to an identifier'.

Personal data is, in simpler terms, any information about you that enables you to be identified. Personal data covers obvious information such as your name and contact details, but it also covers less obvious information such as identification numbers, electronic location data, and other online identifiers.

The personal data that we use is set out in Part 5, below.

4. What Are My Rights?

Under the GDPR, you have the following rights, which we will always work to uphold:

- a) The right to be informed about our collection and use of your personal data. This Privacy Notice should tell you everything you need to know, but you can always contact us to find out more or to ask any questions using the details in Part 11.

- b) The right to access the personal data we hold about you. Part 10 will tell you how to do this.
- c) The right to have your personal data rectified if any of your personal data held by us is inaccurate or incomplete. Please contact us using the details in Part 11 to find out more.
- d) The right to be forgotten, i.e. the right to ask us to delete or otherwise dispose of any of your personal data that we have. Please contact us using the details in Part 11 to find out more.
- e) The right to restrict (i.e. prevent) the processing of your personal data.
- f) The right to object to us using your personal data for a particular purpose or purposes.
- g) The right to data portability. This means that you can ask us for a copy of your personal data held by us to re-use with another service or business in many cases.
- h) Rights relating to automated decision-making and profiling. We do not use your personal data in this way. For more information about our use of your personal data or exercising your rights as outlined above, please contact us using the details provided in Part 11.

Further information about your rights can also be obtained from the Information Commissioner's Office or your local Citizens Advice Bureau.

If you have any cause for complaint about our use of your personal data, you have the right to lodge a complaint with the Information Commissioner's Office.

5. **What Personal Data Do You Collect?**

We may collect some or all of the following personal data

- Name;
- Date of birth;
- Gender;
- Address;
- Email address;
- Telephone number;
- Business name;
- Job title;
- Profession;
- Financial information;

Your personal data may be obtained from the following third parties with which we have a Managing Agent contract:

- Caithness Chamber of Commerce

6. **How Do You Use My Personal Data?**

Under the GDPR, we must always have a lawful basis for using personal data. This may be because the data is necessary for our performance of a contract with you, because you have consented to our use of your personal data, or because it is in our legitimate business interests to use it. Your personal data may be used for one or more of the following purposes:

- Help you to apply for a Loan from us.
- Assess your Loan application.
- Manage any Loan awarded to you.
- Communicating with you. This may include responding to emails or calls from you.

7. **How Long Will You Keep My Personal Data?**

We only keep your personal data for as long as we need to in order to use it as described above in section 6, and/or for as long as we have your permission to keep it.

8. **How and Where Do You Store or Transfer My Personal Data?**

8.1 We only keep your personal data for as long as we need to in order to use it as described above in section 6, and/or for as long as We have your permission to keep it.

8.2 Some or all of your data may be stored outside of the UK and European Economic Area ("the EEA"). (The EEA consists of all EU member states, plus Norway, Iceland, and Liechtenstein). If we do store data outside the EEA, we will take all reasonable steps to ensure that your data is treated as safely and securely as it would be within the UK and under the GDPR.

8.3 Data security is very important to us, and to protect your data we have taken suitable measures to safeguard and secure data.

8.4 Steps we take to secure and protect your data include:

8.4.1 We will not hold your personal data for any longer than is reasonable;

8.4.2 We have taken reasonable steps to protect your information against unauthorised access and against unlawful processing, accidental loss, damage and destruction;

8.4.3 We will not transfer your personal details to any third party for the purpose of direct marketing without your permission. We use third party service providers who may have access to your personal data so that they can provide services to us/you. When this occurs, we have a personal data protection compliant contract in place with these third parties.

9. **Do You Share My Personal Data?**

We contract with the following third parties to supply services to you on our behalf. These include managing the grant application process; assisting potential applicants, applicants and grantees; and the day to day running of our organisation. In some cases, those third parties may require access to some or all of your personal data that we hold.

- Caithness Chamber of Commerce
- Nuclear Decommissioning Authority (funder)
- Ritsons CA (accountancy services)

If any of your personal data is required by a third party, as described above, we will take steps to ensure that your personal data is handled safely, securely, and in accordance with your rights, our obligations, and the third party's obligations under the law.

In some limited circumstances, we may be legally required to share certain personal data, which might include yours, if we are involved in legal proceedings or complying with legal obligations, a court order, or the instructions of a government authority.

10. **How Can I Access My Personal Data?**

If you want to know what personal data we have about you, you can ask us for details of that personal data and for a copy of it (where any such personal data is held). This is known as a "subject access request".

All subject access requests should be made in writing and sent to the email or postal addresses shown in Part 11. To make this as easy as possible for you, a Subject Access Request Form is available for you to use. You do not have to use this form, but it is the easiest way to tell us everything we need to know to respond to your request as quickly as possible.

There is not normally any charge for a subject access request. If your request is 'manifestly unfounded or excessive' (for example, if you make repetitive requests) a fee may be charged to cover our administrative costs in responding.

We will respond to your subject access request within less than one month and, in any case, not more than one month of receiving it. Normally, we aim to provide a complete response, including a copy of your personal data within that time. In some cases, however, particularly if your request is more complex, more time may be required up to a maximum of three months from the date we receive your request. You will be kept fully informed of our progress.

11. **How Do I Contact You?**

To contact us about anything to do with your personal data and data protection, including to make a subject access request, please use the following details (for the attention of Trudy Morris, Managing Agent, North Highland Regeneration Fund):

Email address: enquiries@nhrf.co.uk

Telephone number: 01847 500103

Postal Address: Naver Business Centre, Naver House, Naver Road, Thurso, KW14 7QA

12. **Changes to this Privacy Notice**

We may change this Privacy Notice from time to time. This may be necessary, for example, if the law changes, or if we change our business in a way that affects personal data protection.

Any changes will be made available on our website <https://www.nhrf.co.uk/about-us>