

# The Gannochy Trust – Privacy Policy Statement

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## 1. General Data Protection Regulation (GDPR)

This notice is relevant to:

- organisations that are potential, current and past grant recipients of the Gannochy Trust;
- individuals whose personal data we hold as part of providing services to those individuals such as housing, use of the Gannochy Trust's estate and facilities;
- organisations and individuals that are interested in hearing more about the Gannochy Trust and its activities such as funding guidelines, newsletters and information about events.

## 2. What is GDPR

It is a new law coming into force on 25 May 2018 which addresses what organisations can and cannot do with personal data. Personal data is information that identifies individuals directly or from which individuals can be identified indirectly.

## 3. Privacy Policy

We are committed to protecting the privacy of your data. We wish to respect any personal data you share with us and keep it safe. We aim to be clear when we collect your data and not do anything you wouldn't reasonably expect.

Please read this Privacy Notice carefully to understand our practice and how we will collect, use and store your personal data. We may update this policy from time to time, so please check it regularly. If there are significant updates, we will inform those people with whom we are in regular contact.

## 4. Who we are

Arthur Kinmond Bell, the founder of the Gannochy Trust was a noted visionary who delivered his philanthropy with a degree of unassuming reserve. An extremely able businessman, with considerable foresight and acumen, he established the Gannochy Trust in 1937, for charitable and public purposes.

The charitable objectives of the Trust can be summarised as

- providing grants to charitable organisations across Scotland with a preference for Perth and its environs;
- managing, maintaining, developing and adapting the model housing estate which provides high quality housing at affordable rents;
- managing the Trust's wider estate, the majority of which is run in order to provide amenity for the public;
- organising, supporting and assisting community events.

A full history and more information can be found on the Trust's website .

[www.gannochytrust.org.uk](http://www.gannochytrust.org.uk)

## **5. Why we collect information about you**

Primarily, we collect information to allow us to provide you with the information or service you have requested from us and to tailor them to ensure they are relevant to you. We also want to improve how we communicate with you.

## **6. What are the lawful grounds on which we rely to process your personal data?**

There are six lawful bases for processing data. The Gannochy Trust processes information for the following two reasons:

- As necessary in the pursuit of the legitimate interests of the charity to acquire the information necessary to process applications for grants and housing;
- For compliance with legal obligations, in order to meet our legislative responsibilities as a landlord and as a funder - for example providing full and accurate information to the Office of the Scottish Charity Regulator (OSCR) as necessary.

## **7. How we collect your information**

The Gannochy Trust may collect, store and use the following kinds of personal information:

- a. Information that you give to us directly.
- b. Information that you provide to us for the purpose of applying for a grant, a tenancy, a facility on the Gannochy estate or an event.
- c. Any other information that you choose to send us or provide to us including telephone calls, letters, email or by responding to one of our surveys.

We may link our website directly to other sites. This privacy notice does not cover external websites and we are not responsible for the privacy practices or content of those sites. We encourage you to read the privacy policies of any external websites you visit.

## **8. Grantmaking**

When you make an application for grant funding, we will process information about the charity applicant, for the purpose of assessing the request for funding. In the main, the assessment requires organisational information, but may include details of trustees, the board, employees, volunteers or relevant stakeholders. We will also process information that is relevant to the organisation's finances during assessment.

When personal information is required, this will be provided by the applicant, or through public records relating to the applicant such as OSCR or Companies House. We require the applicant to have authority to include any personal data. When such data is included in the application, the applicant should have made the relevant parties aware of this privacy notice.

The Gannochy Trust processes this information for the following reasons:

- As necessary for the performance of tasks carried out in the public interest, in this case the disbursement of funds to a variety of charitable organisations who meet the Gannochy Trust's charitable objects.
- As necessary in the pursuit of the legitimate interests of the charity, in this case to acquire the information necessary to process grant applications.
- For compliance with legal obligations, in this case to provide full and accurate information to OSCR as necessary.

The terms and conditions of a grant offer from the Gannochy Trust sets out that at specific times, we will expect a report, detailing the progress that you have made against your outcomes. The information that we process at this point is provided by you. Should you reference any details of trustees, the board, employees, volunteers or relevant stakeholders in your report, it is your responsibility to have their authority to do so and to make them aware of this privacy notice.

## 9. Grant-making retention period

The Gannochy Trust reserves the right to hold data related to grant applications for archive purposes and in order to facilitate a high standard of due diligence which will enable the charity to continue to fulfil its charitable objects. Your application and associated correspondence, emails and reports will be held in our database and our files for ten years after your grant has come to an end. In some cases where the Trust has provided significant capital funding as part of a long-term investment, we will reserve the right to keep that information permanently on our records.

## 10. Housing

When you make an application to the Gannochy Trust for a tenancy, we will process information about you the tenant(s). This will include:

- Full name (and proof of your identity)
- Dates of birth of tenants and children who will occupy the house
- National insurance number (your unique identifier)
- Contact details (phone, email or correspondence address)
- Basic details (name and DOB) of all household residents
- Banking details
- Proof of housing eligibility, any interest or equity in other property
- Other personal information that will vary on a case by case basis to help us resolve any breach of tenancy, alleged anti-social behaviour or fraud
- Details of anyone authorised to act on your behalf if applicable

The information that we may collect from you includes:

- Disabilities or vulnerabilities. We use this information to tailor our service to better meet your particular circumstances and needs or those of a family member.
- Financial information . bank statements, payslips or income details including housing benefits. We will use this to assess whether you are able to make the monthly rental payments. We may also use this to help resolve arrears payments.

- Health information when we require this to support an application for sheltered housing or funding for adaptations made to the property you are living in.
- Photo ID.
- Guarantor information if we require a third party to pay your rent if you cannot pay it.
- In some cases, details of key contacts for tenants who hold a Power of Attorney.

If you do not provide the information we need then you may not be able to hold a tenancy or lease with the Trust.

The Gannochy Trust processes this information for the following reasons:

- As necessary in the legitimate interests of the Trust to acquire the information required to process applications for housing and to consider your suitability for a tenancy
- For the performance of tasks relating to your tenancy
- Managing your rent payments, including arrears
- Managing the repairs, maintenance and potential adaptations of our properties
- Managing and assessing the support required by some of our tenants.
- Ensuring tenancy agreement conditions are complied with
- Complying with relevant legislation and regulation

The Gannochy Trust also periodically conducts surveys relating to our processes and customer service in order to gauge satisfaction and to make improvements based on feedback. You will be given the opportunity to decide if you want to opt-in to this activity.

## **11. Housing applications retention period**

The Gannochy Trust reserves the right to hold data related to housing applications in our files and on our database until such time as you have either been offered a house or we have issued you with a letter informing you otherwise. If your application has been unsuccessful, you will have the opportunity to opt-in to receive further information should other opportunities become available.

Information relating to a tenancy or lease agreement will be kept for as long as the agreement is active or where money is owed on the account, and for a period not exceeding three years afterwards. The basic history of who held a tenancy at which property and when will be held forever.

Sensitive personal data will only be kept by us if it is either an integral part of providing you with the service that you have requested (such as health information for access to sheltered or pensioners housing) or once a decision has been made to provide you with a tenancy (such as bank statements etc. which will be kept until the tenancy agreement is signed).

In addition to the above, we will hold the following information:

Type of Record	Retention period
Housing benefit notifications	Duration of tenancy
Health and Safety assessments and records	Permanently
Third party documents eg care plans	Duration of tenancy
Records re offenders, ex-offenders	Duration of tenancy
Anti-social behaviour	Duration of tenancy
Health information that you have provided to us as part of your tenancy	Duration of tenancy

## 12. If you are a person interested in our activities or the use of our facilities

We will use the data that you provide to us to:

- Inform you, with your consent, of our relevant activities and events that we organise or are party to for example, if you have indicated that you would like to hear about our activities or you have signed up to receive one of our bulletins.
- Make you aware of any policy changes or additional requests.

We will continue to use this information until you ask us not to or you unsubscribe from our mailings.

## 13. If you apply for a role with the Trust

Should you apply for a role in our organisation as a Trustee, member of staff, or volunteer, we will retain your application data for 6 months in order to contact you should other suitable opportunities become available.

If you are a sub-contractor we will retain your contact details in case we have a future need for your expertise.

## 14. How we keep your data safe and who has access to it

The Trust will only pass on sufficient contact information that will allow agents employed by the Trust to carry out a particular task (for example, asking contractors to arrange access to provide a quote or to carry out a programme of maintenance, repair or refurbishment or the Rent Officer to achieve a certificate of fair rent).

The Trust will share personal information on residents within sheltered and pensioners housing with external organisations such as Caledonia Housing through the Sheltered Housing Manager Service; Care and Repair; TV licencing; Age UK; Perth and Kinross Council Telecare Services; and the emergency services if required. They form part of our service to you.

Personal or sensitive information will be treated with the strictest confidence. We are committed to ensuring that there are appropriate technical controls in place to protect your personal details from misuse and unauthorised access. For example, our electronic files are password protected and our network is protected and routinely tested. Manual files containing your personal or sensitive data are kept in a secure location and can only be accessed by authorised members of the Gannochy Trust staff. No personal information is kept on the Trust's laptop and only password protected memory sticks are used to store personal information.

Our contractors and service providers are required to comply with the law and our own Data Processing Agreement to ensure data is managed appropriately and for specified purposes.

There are some exceptions when we will pass on your information when it is not part of our service provision. If a tenant leaves without paying rent or making any arrangements to pay we will provide the individual's details to a tracing agent or debt collection company to enable them to collect the arrears that are owed. Should tenants move away leaving behind any unpaid utility bills, we will pass the forwarding address to the utility companies involved.

We do not subject your personal data to any automated decision making.

## **15. Communications**

We may contact you by post and telephone, and where you have provided consent, by e-mail, to let you know about the Trust's activities including any changes to rent, emergency contact numbers etc.

## **16. Your rights**

You have the right to ask for a copy of the information we hold about you. If you want to access your information, please send a description of the information you want to see and proof of your identity to [admin@gannochytrust.org.uk](mailto:admin@gannochytrust.org.uk)

Please let us know if you have any queries or concerns about the way that your data is being processed by contacting us on the details below. You are also entitled to make a complaint to the Information Commissioner's office, and for further information see the Information Commissioner's guidance here <https://ico.org.uk/for-the-public/personal-information>

## **17. Data retention**

In some cases, we are obliged to retain your personal data to comply with legal or statutory obligations (for example, to keep records of contractual or financial matters).

Whilst the specific time periods vary depending on the circumstances, in general we will not keep records that include personal data for more than 6 years after a particular matter, transaction or exchange has concluded. In the event that you ask us to stop sending you information, we will retain certain details, such as your name, to help us ensure that you are not contacted again.

## **18. Contact**

Questions, comments and requests regarding this privacy statement are welcomed and should be addressed to [admin@gannochytrust.org.uk](mailto:admin@gannochytrust.org.uk)

## **19. Changes to this privacy policy**

We keep our privacy policy under regular review. This privacy policy was last updated in May 2018.