

**Water of Leith Conservation Trust**  
**Privacy Policy Updated 2025 – Version 3**  
*With cookies policy annexed*

**Who are we?**

Water of Leith Conservation Trust (“we”, “us”, “our”) are the data controller for the purposes of the Data Protection Act 2018 (“DPA”) and the UK General Data Protection Regulation (“UK GDPR”) in respect to personal information which we hold about you.

Our full contact details are:

Email: [admin@waterofleith.org.uk](mailto:admin@waterofleith.org.uk)

Address: Water of Leith Visitor Centre, 24 Lanark Road, Edinburgh, EH14 1TQ

Telephone number: 0131 455 7367

Charity Number: SC000015

Data Controller: Water of Leith Conservation Trust

**Policy Scope**

This document sets out our data protection and privacy policy in relation to the physical processing of data at our place(s) of work and data processed electronically by staff or on our website.

The privacy and security of your personal data is of utmost importance to us. This privacy policy explains how and why we use your personal data, our data security measures and retention. We also have a CCTV Policy and a Data Protection Policy and Information Security Policy available on request.

This policy applies if you are a customer or supporter of the Trust (member, volunteer, customer or employee) or a user of, or visitor to our website

**What information we collect, use, and why**

The Water of Leith Conservation Trust collects data of individuals for the purpose of administering its charitable activities and events, recruitment and management of staff and from registered volunteers and members. The Water of Leith Conservation Trust processes personal data for the purposes of providing the service that you signed up for and also to keep you informed of activities the Trust has organised that may be of interest to you. This includes:

- Recruit you to the right volunteering role and provide ongoing support
- Process and update your membership
- Know who is attending our events and can contact you in an emergency
- Process donations and claim gift aid
- Fulfil purchases made by you
- Aid you in enquiries and / or complaints
- Employ you

We collect or use the following information to provide our services including running our volunteering and learning programmes.

- Names and contact details
- Addresses
- Emergency contact details
- Photographs or video recordings
- Age – to determine suitability of the program or opportunity
- Health information (including medical conditions, allergies, medical requirements)
- Information relating to compliments or complaints
- Marketing preferences
- Records of consent, where appropriate

In addition we collect or use the following information to receive donations or funding and organise fundraising activities and to administer our membership programme :

- Names and contact details
- Addresses
- Payment or banking details
- Tax payer information (for Gift Aid purposes)
- Marketing preferences
- Records of consent, where appropriate

We collect or use the following personal information for recruitment purposes:

- Contact details (eg name, address, telephone number or personal email address)
- Date of birth
- National Insurance number
- Copies of passports or other photo ID
- Employment history (eg job application, employment references or secondary employment)
- Education history (eg qualifications)
- Right to work information
- Details of any criminal convictions (eg Disclosure Scotland checks )
- Health information (if required for the post)

We collect or use the following personal information for dealing with queries, complaints or claims:

- Names and contact details
- Address
- Video recordings of public areas
- Video recordings of private or staff only areas
- Information relating to health and safety (including incident investigation details and reports and accident book records)
- Correspondence

### **Data Storage and Retention**

All data provided by yourself will be retained by the Water of Leith Conservation Trust for as long as it is needed to provide its function it will then be deleted and securely disposed:

- Details held about 'event' participants will be deleted within 6 months
- You can deregister as a volunteer at any time by calling or emailing and we will delete all information we hold about you within 6 months
- If you choose to leave us as a member at anytime. Please contact the Trust and / or if you chose not to renew your membership at the end of its term. We will then delete all the information we hold about you within 6 months
- The exception to this is the file pertaining to Gift Aid, which is retained for 7 years. This contains basic personal data and signed gift aid declaration.
- If you wish to unsubscribe from our news feed, use the unsubscribe link at the bottom of the email. We do not administer your subscription to this service

Personal data is kept in the private locked office of the Water of Leith Conservation Trust. Staff, Trustees and certain volunteers are admitted but it is not accessible to the public. This is also covered by CCTV at all times. No volunteers, users or other people may have access to the office without either a Trustee or staff member being present. A locked filing cabinet to be used to store paper copies of volunteer registration forms, membership applications, gift aid forms and all personal data relating to staff and trustees

All office computers containing sensitive data or access to our network are password protected. No record of passwords is stored on paper. Where necessary, certain passwords are held within an encrypted password sharing service to enable admin staff and support consultants to access shared devices and resources.

Access to these passwords is given on a need-to-know basis. All passwords also are changed on an occasional basis and whenever there is a concern over security. Data is backed up daily on to encrypted hard drives and to 'one drive' password protected cloud storage. WOLCT uses anti-virus and firewall software to prevent unwanted intrusion into our data.

Some information is stored by external servers where services are provided by third-parties (such as our mailchimp account for our mailing list, Eventbrite for events administration, memberpress and paypal for membership). These providers all have their own data protection, privacy and information security protocols

We confirm that any personal information that you provide to us will be held in accordance with the GDPR. If our data security is compromised, we will inform you immediately and the Information Commissioner within the legislated time limit and in accordance with our data breach procedures.

We do not sell data or actively share data with any outside organisation not directly involved in the delivery or support of a service we provide, such as MailChimp.com who provide our email newsletter service.

### **Lawful bases and data protection rights**

Under UK data protection law, we must have a “lawful basis” for collecting and using your personal information. There is a list of possible lawful bases in the UK GDPR. You can find out more about lawful bases on the ICO’s website.

Which lawful basis we rely on may affect your data protection rights which are in brief set out below. You can find out more about your data protection rights and the exemptions which may apply on the ICO’s website:

- Your right of access - You have the right to ask us for copies of your personal information. You can request other information such as details about where we get personal information from and who we share personal information with.
- Your right to rectification - You have the right to ask us to correct or delete personal information you think is inaccurate or incomplete. You can read more about this right here.
- Your right to erasure - You have the right to ask us to delete your personal information. You can read more about this right here.
- Your right to restriction of processing - You have the right to ask us to limit how we can use your personal information. You can read more about this right here.
- Your right to object to processing - You have the right to object to the processing of your personal data. You can read more about this right here.
- Your right to data portability - You have the right to ask that we transfer the personal information you gave us to another organisation, or to you. You can read more about this right here.
- Your right to withdraw consent – When we use consent as our lawful basis you have the right to withdraw your consent at any time. You can read more about this right here.

If you make a request, we must respond to you without undue delay and in any event within one month. To make a data protection rights request, please contact us using the contact details at the top of this privacy notice.

Our lawful bases for collecting or using personal information for provide our services including running our volunteering and learning programmes, providing service updates or marketing purposes are:

- Consent - we have permission from you after we gave you all the relevant information. All of your data protection rights may apply, except the right to object. To be clear, you do have the right to withdraw your consent at any time.
- Legal obligation – we have to collect or use your information so we can comply with the law. All of your data protection rights may apply, except the right to erasure, the right to object and the right to data portability.
- Contract – we have to collect or use the information so we can enter into or carry out a contract with you. All of your data protection rights may apply except the right to object.

### **How to complain**

If you have any concerns about our use of your personal data, you can make a complaint to us using the contact details at the top of this privacy notice.

If you remain unhappy with how we’ve used your data after raising a complaint with us, you can also complain to the ICO.

The ICO’s address:

Information Commissioner’s Office

Wycliffe House

Water Lane

Wilmslow

Cheshire

SK9 5AF

Helpline number: 0303 123 1113

Website: <https://www.ico.org.uk/make-a-complaint>

Version 3 - This policy has been prepared by Helen Brown

Approved by Trustees at the meeting held 01.03.2025

To be reviewed no later than 01.03.2028

### **Annex 1**

#### **Cookies Policy:**

The Water of Leith Conservation Trust is committed to protecting your privacy when you visit our website. We use cookies to provide you with the best possible experience and allow full use of the website. This page will tell you what cookies are, how we use them, and how you can control their use.

### **What are cookies and why do we use them?**

Cookies are small text files placed within your web browser by a website in order to record something about you, such as a unique session ID to enable you to use a shopping cart or to note your settings choices for a specific website. They are a common part of almost all websites, they cannot change settings on your computer or pass on any malware or viruses. These files are used to remember you when you next access the website or as you navigate between pages. The information held in them is used to help make a website work better, providing the best possible online experience for you and enables site owners to see how visitors use their website.

### **Which cookies do we use?**

#### First party cookies

First party cookies are set by us to enhance security, enable core site functionality and to improve our services to provide a better user experience. We do not use cookies to gather personal data about you as your privacy is important to us.

First party cookies in use across the site include:

wf\_loginalterted\_{uniqueID} - core site functionality.  
wfwaf-authcookie-{uniqueID} - core site functionality.  
wordpress\_test\_cookie - core site functionality.  
wp-settings-{number} - core site functionality.  
wp-settings-time-{number} - core site functionality.  
\_ga - set by Google Analytics which allows us to assess anonymised site usage data.  
\_ga\_{uniqueID} - set by Google Analytics which allows us to assess anonymised site usage data.

#### *Third party cookies & Embedded Content*

You may notice some cookies that are not from the Water of Leith Conservation Trust when using our website. When you visit a page with embedded content, such as YouTube videos, Twitter posts or the SoundCloud audio player, you may be given cookies from a third-party website. Embedded content from other websites behaves in the same way as if the visitor had visited that external website. These websites may collect data about you, use cookies, embed additional third-party tracking, including tracking your interaction with the embedded content if you have an account and are logged in to that website.

Third-party cookies we are currently aware of in relation to embedded content on various pages of the site include those set by :

YouTube.com - associated with embedded videos across the site.

doubleclick.net - relates to YouTube interaction.

SoundCloud.com - associated with embedded audio players within the Audio Trail section of our site.

twitter.com / platform.twitter.com - associated with embedded tweets within certain blog posts.

Facebook – which uses cookies to keep account, data and facebook products safe and secure

The Water of Leith Conservation Trust does not control these cookies. If you need further information about them, please check the third-party website.

#### *Social Networks & External Links*

In addition to this website, we also maintain a presence within a number of social media sites, which you can access via icons or share buttons across our website. If you choose to visit social networks or external sites linked to from this website, your personal data may be transmitted to the provider of that service or site. These sites may transmit data to a server in a third country and thus process data outside the European

Union. The purpose and scope of the data collection by the respective medium and the further processing of your data there as well as your rights in this regard can be found in the data protection policies of the respective responsible party.

We would like to point out that our website contains links to external third-party websites, whereby we have no influence on or responsibility for the processing of data on these third-party websites.

### **How do I change my cookie settings?**

You can block the cookies on our site by changing your browser settings. Please remember however that if you block our cookies, you may not be able to access the full functionality of this website. For more information on blocking cookies, please visit <https://www.aboutcookies.org.uk/>

### **Changes to this policy**

In keeping with legal requirements, we may need to update this cookie policy occasionally.

Version 3 updated 03.01.2025