

NFA Privacy Statement

This document explains what personal data the New Findhorn Association might hold about you and what responsibilities we have and what rights you have concerning that data.

Within this document The New Findhorn Association may be referred to as: The NFA, The Association, us, our or we. NFA members may be referred to as members or you and users/ purchasers of NFA services who are not members may be referred to as subscribers, non-members or you.

What is personal data?

When using the term 'personal data' in our Privacy Policy, we mean information that relates to you and allows us to identify you, either directly or in combination with other information that we may hold, particularly if it relates to data about sensitive information such as your health, finances and affiliations. For those of you who only want the NFA to announce your birthday in the Rainbow Bridge we may only hold your name and date of birth, but for those of you, who are members of the association and have filled in the NFA Critical Illness Form, the personal data we hold may include sensitive information about our health. (see **What types of data does the NFA store?** for more details.)

The purposes we use your personal data for

The NFA promises to only use your data to carry out its stated functions. These are:

- 1) To administer the association and ensure the collection of fees necessary to carry out its functions;
- 2) To provide, those of our services, members ask us to provide;

How will we treat your personal data?

We will:

- 1) keep the data we hold securely (see **How is my personal data kept secure?**);
- 2) limit access to the data we hold, to those who need access to it, in order that the relevant functions can be carried out (see **Who can access my personal data?**);
- 3) do our best to ensure that it is accurate;
- 4) only keep data that is required to carry out our stated functions;
- 5) only use your data:
 - a) to provide services you, or those that are legally responsible for you, have asked us to provide;
 - b) in support of our collective well-being and security;
 - c) to carry out any legal obligations not included in the above list.
- 6) only keep your personal data for as long as is necessary to fulfil our stated functions;
- 7) if requested by you, we will supply copies of the data we hold on you, once all references to other identifiable individuals have been removed, within one month;
- 8) only share your data with other trusted organisations:
 - a) when you ask us to or give us permission to;
 - b) in order to carry out our stated functions;
 - c) when the law requires us to.
- 9) Tell the ICO if we find out that your personal data has been accessed by an unauthorised person, stolen or lost.

What rights do I have?

You can:

- 1) withdraw consent for us to hold or use any part or all the personal data you have supplied us with, at any time. We will then remove from our records all the data we hold, except when this would conflict with our other contractual or legal obligations. Please note we are only able to provide you with services for which we have the relevant information;
- 2) tell us about changes to your personal data or about data we have not stored accurately and we'll re-enter your data correctly.
- 3) tell us who, if anyone, you want us to disclose your personal data too.

- 4) If you ask us for a copy of the data, we will provide you with one, within one month.

Who is responsible, in the NFA, for looking after your personal data?

The NFA council are the body legally responsible for ensuring that the NFA complies with its legal obligations in respect of the Act. Operational responsibility is delegated to the 'data controller' for the purposes of the UK General Data Protection Regulation 2018, who will be our Administrative Secretary.

Who can access my personal data?

The NFA office administrator can access all personal data held within the NFA office and on NFA office computers and NFA online accounts.

The Listener Conveners can access all the personal data held within the NFA Office and on NFA office computers and NFA online accounts, which do not contain Financial Information.

The NFA accountant can access the Financial information the NFA hold.

All information collected by NFA office volunteers, who work in the Findhorn Foundation's General Office, will be stored in a locked cabinet in the NFA office outside office hours.

NFA phone list and Website listings are in the public domain

How long will my personal data be kept?

- 1) Your financial transaction will be kept for 7 years, as we are legally obliged to do this.
- 2) We will keep your personal data (other than financial data) for the period you have given permission to keep it. That is, while you tell us you want service(s) from us, whether as a member and/ or a subscriber, we will keep the relevant personal data.
- 3) If you ask us to stop giving you a service or you no longer want to be a member of the NFA, we will delete the relevant personal data (except financial data). Every email message we send includes directions as to how to opt out of

receiving services, should you wish to. You can also contact us to change your address or email address.

- 4) If your membership/ subscription lapses and you have not given us clear instructions as what your wishes are, regarding your data, we will keep your personal data while we try and find out what your wishes are. This period will last no more than 3 months. If, after this time, you tell us you want your personal data deleted or we have not received clear instructions from you, your personal data (other than financial data) will be deleted. However, if you renew your membership and/or subscription we will keep your data for the appropriate period.
- 5) If you ask us to keep your data, even though you are not receiving a relevant service, we will keep your personal data (except for financial data) for up to two years, unless you have given us further instructions.

Once the records of your membership/ subscriptions are deleted, if you want to become a member again or obtain a service from us, you will have to re-supply us with the data necessary to give you the service(s) you want.

How is my personal data to be kept secure?

Personal data is stored:

- 1) on paper will be held by the NFA in a locked cupboard in the NFA office, which is locked when no NFA staff or volunteers are present;
- 2) in the NFA database will be stored on a server located a country has incorporated GDPR into their domestic law;
- 3) on password protected computers that are kept in locked rooms when not in use.

If you ask us to send out copies of your personal data to you or to a trusted organisation, we will either send it by:

- 1) registered mail; or
- 2) email. If this method is used, your personal data will be placed within an attachment with a password, which is agreed between sender and receiver before the email is sent;

Personal data received by:

- 1) email, by methods other than described above will be transferred to the database, where applicable, and the email deleted.

What types of data does the NFA store

What types of data does the NFA need before it will admit you as a member?

- Your name(s)
- How to contact you
- Confirmation of payment method, and your account details if paying by Standing Order
- Your permission to store your data

What else to we ask?

- Your date of birth
- Who we should contact in an emergency
- How many children you have.
- Your areas of skill and experience you would like to offer or engage with.
- If and when, you've attended Experience Week
- Which of our services you want us to provide
- The additional data necessary to provide those services.

What additional data do you need to inform us of if you ask us to provide specific services?

| Service | Personal Data |
|--------------------------------------|---|
| NFA phone list | Name(s) and telephone number(s) to be entered into the phone list |
| Business listings on the NFA website | Contact details, business address and type of service, prices and description of the service. Payment details |
| Rainbow bridge birthday list | Name and date of birth |
| NFA newsletter | Email address |
| Rainbow bridge | Email address, payment details |

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| To assist the NFA and Community Care Circle in supporting you when you have care needs and to tell us what you would like to happen and who you want to be responsible after your death. | NFA Critical Illness Forms |
| Findhorn Foundation Meal Account | No additional information required |
| To inform you which NFA affiliated organisations are looking for your skills | Skills and interests offered |
| For individual members to contact your organization to offer their skills | Skills and interests required. |

What about my Payment details?

What information does the NFA collect about me when I make a financial contribution?

To process your membership fees and subscriptions we ask for your name, address, phone number and email address. We use this information to communicate with you about your payments and for financial auditing purposes.

How is online payment information processed?

If your payment or donation is made through the NFA website we do not have access to your payment card details. These are processed by Paypal please see their privacy policy for details

How are offline payments processed?

We take payments by standing order. The member will fill out a standing order form and either send to their bank directly or we will send it for them. In the case of us sending it for them, we do not keep copies of the information provided to us.

We take payments by cash and cheque. In these cases, we will record the name of the payee, the amount and the purpose of the payment. These details are kept in a transaction folder, which is kept in a locked cupboard.

How long is financial information stored?

We retain these details for 7 years to comply with HMRC regulations on financial record keeping. After this time, they are destroyed

Do you ever share my information with third parties?

We will only share your data with third parties if you ask us to.

The most common reason why you might ask us to share your data with a 3rd party is if you want us to set up a Findhorn Foundation meal account for you.

What categories of personal data do we hold without obtaining the identified individual's permission?

- 1) Any persons that you identify in the data you give us, other than yourself (e.g children, Next-of-kin or emergency contacts). It is your responsibility to be sure that you have these people's permission to record their name(s) and, where relevant, their contact details.
- 2) Sufficient information will be recorded to identify individuals refused membership or who have been expelled from the association and reason for this decision.
- 3) As part of our duty of care towards the Findhorn Community, personal data relating to individual(s) whose presence is having a serious negative impact on the community, may be held for as long as is deemed necessary to manage or resolve the situation.

What non-personal data does the NFA keep?

Data about ex-members or past periods of membership that current members have had, which is held in an anonymised state, to carry out audits or for research into ways of improving our services. There is no time limit as to how long we will keep this data.

How to contact the NFA.

The New Findhorn Association office is at: General Office, The Park, Findhorn IV36 3TZ and can be contacted via email using nfa@findhorn.cc or by phone 01309 692223.