

Findhorn Nairn & Lossie Rivers Trust (Trust) Data Handling Policy

1. The Trust in pursuance of its charitable objects which include the advancement for public benefit environmental protection and improvement by conserving and enhancing all species of freshwater fish and their environments primarily but not limited to the inland and coastal waters of the catchments of the rivers Findhorn, Nairn and Lossie needs to process personal data.

The Trust accepts that it is a data controller for the purposes of the General Data Protection Regulation and that it must comply with the following six principles for the handling of personal data: -

- fairly and lawfully processed
- processed for limited purposes
- adequate and relevant and limited to what is necessary
- accurate and where necessary up to date
- not kept in a way that people can be identified from it for longer than is necessary
- processed in a way that ensures appropriate security

2. The Trust's officer responsible for compliance with GDPR is Clare Walker. She will maintain the Trust's databases in compliance with GDPR. The Trust will hold separate databases:

- A Public Task database of data held necessary to uphold the Trust's statutory duties
- A Contract database with information required in fulfilment of those contracts
- A Legitimate Interests database held subject to satisfaction of a 'legitimate interests' assessment' (LIA assessment);
- Consent database, all data held under consent of the data subjects.

3. The Trust will audit its information annually to ensure that its data bases are compliant with the six principles of GDPR. In particular, the audit will ensure:

- that data is held in compliance with the act
- data held is accurate
- that no more data is held that is necessary
- that data will be held only for so long as it is needed.

After each annual audit the responsible officer will note that the audit has taken place and that he/she certifies the Trust's databases as being compliant with GDPR.

4. The Trust will ensure that all the data held is securely stored. This will apply to physical copies of data as well as computer-based data.

5. The Trust will respond within 28 days to any written request (including by e-mail) by a data subject for details of information held by the Trust on them.

6. The Trust will publish a Privacy notice on its website.