



FINDHORN,
NAIRN AND LOSSIE
RIVERS TRUST

Findhorn, Nairn and Lossie Rivers Trust

Fisheries Office,
Logie Steading,
Dunphail, Forres,
Moray IV36 2QN

07501767501
admin@fnlrt.org.uk
www.fnlrt.org.uk

FNLRT Privacy Notice

Registered name: Findhorn Nairn & Lossie Rivers Trust

Who We Are

The Findhorn Nairn & Lossie Rivers Trust (FNLRT) holds certain personal data for the purpose of fulfilling its charitable objects as set out in its constitution, which includes 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.

We are the controller of your personal data. For more information on controllers and their responsibilities please see the Information Commissioners Officer (ICO) guidance on [data protection principles, definitions, and key terms](#).

This privacy notice tells you what to expect us to do with your personal information.

- Contact details
- What information we collect, use, and why
- Lawful bases and data protection rights
- Where we get personal information from
- How long we keep information
- Who we share information with
- Sharing information outside the UK
- How to complain

Contact Details

FNLRT is a company registered in Scotland, **Company No: 350687** and a registered Scottish Charity, **No: SC040152**. We can be contacted using the following information:

Post

Our registered office is at Fisheries Office, Unit 17, Logie Steading, Dunphail, Forres, Moray, IV36 2QN.

Telephone

07501767801

Email

admin@fnlrt.org.uk

We are registered on the Information Commissioner's Office Register, registration number **ZA094408** and we act as data processor, data controller and co-controller depending on the circumstances.

What Information we Collect and Why

To enable us to **provide ecological services** we need to collect the following information:

- Names and contact details
- Addresses

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- Payment details (including card or bank information for transfers and direct debits)
- Information relating to compliments or complaints

When **receiving donations or funding and when organising fundraising activities**, we need collect some personal information from our supporters, including:

- Names and contact details
- Addresses
- Payment or banking details
- Donation history
- Tax payer information (for Gift Aid purposes)
- Gifts in wills

To keep our supporters, stakeholders and beneficiaries up to date with **service updates or for marketing purposes** we may use:

- Names and contact details
- Addresses
- Marketing preferences
- Records of consent, where appropriate

We collect or use the following personal information for **scientific or historical research purposes, for statistical purposes or for archiving in the public interest** in these instances you will be informed in advance of our intention and given the opportunity to opt out:

- Names and contact details
- Recorded images, such as photos or videos
- Personal information used for administration of research
- Personal information used for the purpose of research
- Records of consent, where appropriate

Sometimes we are required to collect and use personal information to **comply with legal requirements**, this may be:

- Name
- Contact information
- Financial transaction information
- Any other personal information required to comply with legal obligations
- Health and safety information
- Safeguarding information

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 Barring Service (DBS), Access NI or Disclosure Scotland checks)

To enable us to effectively handle **queries, complaints or claims** we may need to collect some personal information:

- Names and contact details
- Address
- Witness statements and contact details
- Relevant information from previous investigations
- Customer or client accounts and records

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- Financial transaction information
- Information relating to health and safety (including incident investigation details and reports and accident book records)
- Correspondence

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](#) or in our [Data Protection Policy](#). Which lawful basis we rely on may affect your data protection rights which are set out in brief 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. There are some exemptions which means you may not receive all the information you ask for. Read more about the right of access.
- **Your right to rectification** - You have the right to ask us to correct or delete personal information you think is inaccurate or incomplete. Read more about the right to rectification.
- **Your right to erasure** - You have the right to ask us to delete your personal information. Read more about the right to erasure.
- **Your right to restriction of processing** - You have the right to ask us to limit how we can use your personal information. Read more about the right to restriction of processing.
- **Your right to object to processing** - You have the right to object to the processing of your personal data. Read more about the right to object to processing.
- **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. Read more about the right to data portability.
- **Your right to withdraw consent** – When we use consent as our lawful basis you have the right to withdraw your consent at any time. Read more about the right to withdraw consent.

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.

Cookies

Our website www.fnrlt.org.uk uses Cookies. By visiting our website with your personal browser settings configured to accept cookies implies to us that you are consenting to our use of cookies as described below. Our Cookies Policy is available <https://www.fnrlt.org.uk/cookies>

Our lawful bases for the collection and use of your data

Our lawful bases for collecting or using personal information to **provide ecological services** 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.
- **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.
- **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.

Our lawful bases for collecting or using personal information to **receive donations or funding and organise fundraising activities or events** 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.

Our lawful bases for collecting or using personal information for **service updates or for 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.
- Legitimate interests – we're collecting or using your information because it benefits you, our organisation or someone else, without causing an undue risk of harm to anyone. All of your data protection rights may apply, except the right to portability. Our legitimate interests are:
 - Providing people with information on our activities, services, fundraising, newsletter requests and to comply with legal obligations.

For more information on our use of legitimate interests as a lawful basis you can contact us using the contact details set out above.

Our lawful bases for collecting or using personal information for **scientific or historical research purposes, for statistical purposes or for archiving in the public interest** 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.
- Legitimate interests – we're collecting or using your information because it benefits you, our organisation or someone else, without causing an undue risk of harm to anyone. All of your data protection rights may apply, except the right to portability. Our legitimate interests are:
 - It is important to monitor and evaluate the impact of our activities over time by maintaining data sets for research purposes. Express consent will be sought whenever any personal information is required to contribute to this legitimate interest.

For more information on our use of legitimate interests as a lawful basis you can contact us using the contact details set out above.

Our lawful bases for collecting or using personal information to **comply with legal requirements** 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.

Our lawful bases for collecting or using personal information for **recruitment 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.
- Legitimate interests – we're collecting or using your information because it benefits you, our organisation or someone else, without causing an undue risk of harm to anyone. All of your data protection rights may apply, except the right to portability. Our legitimate interests are:
 - We process personal information provided during the recruitment process on the basis of our legitimate interests in recruiting and selecting suitable employees,

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assessing candidates' suitability for employment, maintaining recruitment records, and defending any legal claims arising from the recruitment process.

For more information on our use of legitimate interests as a lawful basis you can contact us using the contact details set out above.

Our lawful bases for collecting or using personal information for **dealing with queries, complaints or claims** 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.
- **Legitimate interests** – we're collecting or using your information because it benefits you, our organisation or someone else, without causing an undue risk of harm to anyone. All of your data protection rights may apply, except the right to portability. Our legitimate interests are:
 - We process personal information relating to complaints to assist us in investigating and resolving complaints, improving our services, protecting our staff and organisation, maintaining appropriate records, and establishing, exercising or defending legal claims.

For more information on our use of legitimate interests as a lawful basis you can contact us using the contact details set out above.

Where we get personal information from

- Directly from you – this may be through signup forms, donations or gift aid forms, event registrations, recruitment applications, requests/contracts for services
- Previous employers (as part of recruitment processes)

We do not use third parties to purchase personal information.

How long we keep information

We hold your information only as long as necessary for each purpose we use it. This period will normally be for seven years after your last financial contribution or other financial activity with us, unless we have a good reason to keep your information for a longer period. This is based on any legal, regulatory or business reasons we may have to retain your information.

If you have signed subscribed to receive service updates, newsletters and other marketing, you will be able to unsubscribe using the link in our correspondence at any time and your personal information will be removed immediately.

Recruitment-related information will be retained for 6 months after the closing of the recruitment for unsuccessful candidates. For successful candidates, data will be retained according to our Data Retention Policy.

You have the right to ask us to remove your personal information from our records. We will inform you in writing when we have actioned your request and if we need to refuse you, we will give you the reasons why.

Safeguarding Your Information

We take every reasonable measure and precaution to protect and secure your personal data. Your data will be kept on our secure cloud-based server and backed up on a secure external server; our PCs are password-protected and have antivirus and security software installed.

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Who we share information with

To assist us with processing personal information we use some trusted third-party service providers to process data on our behalf. We require all data processors to protect your personal data and only process it in accordance with our instructions, below are the primary third parties that we have data processing relationships with:

Data processors:

PayPal

This data processor does the following activities for us: We use PayPal to process online donations, event sales and other fundraising transactions.

Eventbrite

This data processor does the following activities for us: We often hold events and fundraisers or volunteer opportunities using Eventbrite who act as data processors for collecting attendee information, processing ticket purchases, sending event emails at our request, and providing attendee reports.

Microsoft (365 and Cloud storage)

This data processor does the following activities for us: Microsoft provides the organisation with data and file storage both on local drives and secure cloud-based storage, some of which may contain personal data.

Rural Communications Ltd

This data processor does the following activities for us: provides additional data and file backup on secure servers, some of which may contain personal data.

MailChimp

This data processor does the following activities for us: We use Mailchimp as a sign-up platform for collecting personal information of those who opt to receive updates/marketing from us, this subscriber database is maintained within the MailChimp account.

Others we share personal information with:

- Relevant regulatory authorities
- External auditors or inspectors
- Publicly on our website, social media or other marketing and information media (with express consent)
- Previous employers (as part of recruitment process)

Sharing information outside the UK

Where necessary, we will transfer personal information outside of the UK. When doing so, we comply with the UK GDPR, making sure appropriate safeguards are in place.

For further information or to obtain a copy of the appropriate safeguard for any of the transfers below, please contact us using the contact information provided above.

Organisation name: Eventbrite

Category of recipient: Ticket Management Provider

Country the personal information is sent to: United States

How the transfer complies with UK data protection law: UK International Data Transfer Addendum (IDTA).

Organisation name: PayPal

Category of recipient: Financial Services

Country the personal information is sent to: United States

How the transfer complies with UK data protection law: Standard Contractual Clauses (SCCs) alongside the UK Addendum approved by the Information Commissioner

Organisation name: Microsoft

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Category of recipient: Cloud storage

Country the personal information is sent to: United States

How the transfer complies with UK data protection law: UK-US Data Bridge

How to complain

If you have any concerns about our use of your personal information, you can make a data protection complaint to us:

Email: admin@fnlrlt.org.uk

Telephone: 07501767801

Post: Findhorn Nairn & Lossie Rivers Trust Logie Steading Dunphail Forres IV36 2QN

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>

This Privacy Notice was last updated on 30th September 2026.