



## Privacy Notice

### Introduction

This document refers to personal data, which is defined as information concerning any living person (a natural person who hereafter will be called the Data Subject) that is not already in the public domain.

The General Data Protection Regulation (GDPR) seeks to protect and enhance the rights of data subjects. These rights cover the safeguarding of personal data, protection against the unlawful processing of personal data and the unrestricted movement of personal data within the EU. It should be noted that GDPR does not apply to information already in the public domain.

Carloway Estate Trust (Urras Oighreachd Charlabhaigh) is pleased to provide the following Privacy Notice:

### Personal Data

Carloway Estate Trust (Urras Oighreachd Charlabhaigh) uses the information collected from you to provide community landlord services, membership information and services, information regarding events and land management services. In making initial contact you consent to Carloway Estate Trust (Urras Oighreachd Charlabhaigh) maintaining a dialogue with you until you either opt out (which you can do at any stage) or we decide to desist in offering our services. Carloway Estate Trust (Urras Oighreachd Charlabhaigh) may also act as a data processor.

Some personal data may be collected about you from forms and surveys you complete, from records of our correspondence and phone calls and details of your visits to our website, including but not limited to personally identifying information like Internet Protocol (IP) addresses. Carloway Estate Trust (Urras Oighreachd Charlabhaigh) may from time to time use such information to identify its visitors. Carloway Estate Trust (Urras Oighreachd Charlabhaigh) may also collect statistics about the behavior of visitors to its website.

Carloway Estate Trust's (Urras Oighreachd Charlabhaigh) website may use cookies, which is a string of information that a website stores on a visitor's computer, and that the visitor's browser provides to the website each time the visitor returns. Cookies may be used to help Carloway Estate Trust (Urras Oighreachd Charlabhaigh) identify and track visitors and their website access preferences. Carloway Estate Trust (Urras Oighreachd Charlabhaigh) website visitors who do not wish to have cookies placed on their computers should set their browsers to refuse cookies before using Carloway Estate Trust (Urras Oighreachd Charlabhaigh) website.

Any information Carloway Estate Trust (Urras Oighreachd Charlabhaigh) holds about you and your business encompasses all the details we hold about you and any sales transactions including any third-party information we have obtained about you from you, public sources and our own suppliers.

Carloway Estate Trust (Urras Oighreachd Charlabhaigh) will only collect the information needed so that it can provide you with the services noted above and does not sell or broker your data.

### Legal basis for processing any personal data

To meet Carloway Estate Trust's (Urras Oighreachd Charlabhaigh) contractual obligations to clients and to also respond to marketing enquiries.

## Legitimate interests pursued by Carloway Estate Trust (Urras Oighreachd Charlabhaigh) and/or its clients

To manage the services offered by Carloway Estate Trust (Urras Oighreachd Charlabhaigh) and/or to market the events, services and/or products offered by Carloway Estate Trust's (Urras Oighreachd Charlabhaigh) existing clients.

## Consent

Through agreeing to this privacy notice you are consenting to Carloway Estate Trust (Urras Oighreachd Charlabhaigh) processing your personal data for the purposes outlined. You can withdraw consent at any time by emailing [info@carlowayestatetrust.co.uk](mailto:info@carlowayestatetrust.co.uk) or by writing to us, see last section for full contact details.

## Disclosure

Carloway Estate Trust (Urras Oighreachd Charlabhaigh) may on occasions pass your Personal Information to third parties exclusively to process work on its behalf. Carloway Estate Trust (Urras Oighreachd Charlabhaigh) requires these parties to agree to process this information based on our instructions and requirements consistent with this Privacy Notice and GDPR.

Carloway Estate Trust (Urras Oighreachd Charlabhaigh) do not broker or pass on information gained from your engagement with the agency without your consent. However, Carloway Estate Trust (Urras Oighreachd Charlabhaigh) may disclose your Personal Information to meet legal obligations, regulations or valid governmental request. The Trust may also enforce its Terms and Conditions, including investigating potential violations of its Terms and Conditions to detect, prevent or mitigate fraud or security or technical issues; or to protect against imminent harm to the rights, property or safety of Carloway Estate Trust (Urras Oighreachd Charlabhaigh), its customers, tenants and/or the wider community.

## Retention Policy

Carloway Estate Trust (Urras Oighreachd Charlabhaigh) will process personal data during the duration of any contract and will continue to store only the personal data needed for five years after the contract has expired to meet any legal obligations. After five years any personal data not needed will be deleted.

## Data storage

Data is held in Scotland using local networked PC's different. Carloway Estate Trust (Urras Oighreachd Charlabhaigh) does not store personal data outside the EEA.

## Your rights as a data subject

At any point whilst Carloway Estate Trust (Urras Oighreachd Charlabhaigh) is in possession of or processing your personal data, all data subjects have the following rights:

- **Right of access** – you have the right to request a copy of the information that we hold about you.
- **Right of rectification** – you have a right to correct data that we hold about you that is inaccurate or incomplete.
- **Right to be forgotten** – in certain circumstances you can ask for the data we hold about you to be erased from our records.
- **Right to restriction of processing** – where certain conditions apply you have a right to restrict the processing.
- **Right of portability** – you have the right to have the data we hold about you transferred to another organisation.
- **Right to object** – you have the right to object to certain types of processing such as direct marketing.
- **Right to object to automated processing, including profiling** – you also have the right not to be subject to the legal effects of automated processing or profiling.

In the event that Carloway Estate Trust (Urras Oighreachd Charlabhaigh) refuses your request under rights of access, we will provide you with a reason as to why, which you have the right to legally challenge.

Carloway Estate Trust (Urras Oighreachd Charlabhaigh) at your request can confirm what information it holds about you and how it is processed.

You can request the following information:

- Identity and the contact details of the person or organisation (Carloway Estate Trust (Urras Oighreachd Charlabhaigh)) that has determined how and why to process your data.
- The purpose of the processing as well as the legal basis for processing.
- If the processing is based on the legitimate interests of Carloway Estate Trust (Urras Oighreachd Charlabhaigh) or a third party, information about those interests.
- The categories of personal data collected, stored and processed.
- Recipient(s) or categories of recipients that the data is/will be disclosed to.
- How long the data will be stored.
- Details of your rights to correct, erase, restrict or object to such processing.
- Information about your right to withdraw consent at any time.
- How to lodge a complaint with the supervisory authority (Data Protection Regulator).
- Whether the provision of personal data is a statutory or contractual requirement, or a requirement necessary to enter into a contract, as well as whether you are obliged to provide the personal data and the possible consequences of failing to provide such data.
- The source of personal data if it wasn't collected directly from you.

To access what personal data is held, identification will be required

Carloway Estate Trust (Urras Oighreachd Charlabhaigh) will accept the following forms of ID when information on your personal data is requested: a copy of your national ID card, driving licence, passport, birth certificate and a utility bill not older than three months. A minimum of one piece of photographic ID listed above and a supporting document is required. If Carloway Estate Trust (Urras Oighreachd Charlabhaigh) is dissatisfied with the quality, further information may be sought before personal data can be released.

All requests should be made to [info@carlowayestatetrust.co.uk](mailto:info@carlowayestatetrust.co.uk) or by writing to us at the address further below.

## Complaints

In the event that you wish to make a complaint about how your personal data is being processed by Carloway Estate Trust (Urras Oighreachd Charlabhaigh) you have the right to complain to Carloway Estate Trust's (Urras Oighreachd Charlabhaigh) Chairman. If you do not get a response within 30 days you can complain to the Data Protection Regulator.

The details for each of these contacts are:

The Chairman  
Carloway Estate Trust (Urras Oighreachd Charlabhaigh),  
Carloway School  
Knock  
Carloway  
Isle of Lewis  
HS2 9AU