



## Scottish Love in Action - Legitimate Interest Statement

As from 25th May 2018, under the General Data Protection Regulations, Scottish Love in Action (SLA) claims legitimate interest as per GDPR Article 6(1)(f).

This permits the organisation to continue to contact its supporters by post. Individuals are free to opt out of postal contact at any time.

Clear information about how individuals can opt out of contact or change their contact preferences is prominent on SLA's website and those printed materials with a data capture element.

An up-to-date Privacy Policy is available on the SLA website at [www.sla-india.org](http://www.sla-india.org)

Our detailed rationale for claiming legitimate interest is as follows:

### **The purposes for which we will use individuals' information**

- Sending fundraising appeals and updates to SLA donors who wish to support our work
- Sending updates to non-donor supporters with an interest in SLA's work

Without these contact opportunities, SLA's income generation potential is put at risk, endangering the long-term survival of the organisation and the services to its beneficiaries.

Under articles 47 and 48 of the GDPR we believe that such direct marketing activity is justified, as required, in the context of a relevant and appropriate relationship between the organisation (SLA) and the individual (the recipient).

### **The legitimate interests of third parties**

In order to deliver the direct marketing described above, SLA may provide individuals' personal contact details to mailing and fulfilment houses, supplied from our own secure database. We make every effort to ensure the data we send to suppliers is secure at every point of transfer and during all the stages of data processing. Our reputable suppliers are required to provide their security protocols on demand. Personal data may be held on servers within or outwith the EU and is securely deleted by our suppliers as soon as each mailing activity has been completed.

### **Necessity for the data processing of personal information**

SLA's communications programme is highly dependent on mail for delivering information about SLA's work. Without mail-based communications, SLA's ability to continue to generate income to fund its work would be compromised.

## **Rights and freedoms of the individual**

SLA will do the following with the personal information it holds. None of these activities infringe the rights or freedoms of individuals under the terms of the GDPR:

- Analyse personal data and actions (primarily donating) to enable us to provide information that will enhance the individuals' experience of SLA.
- Securely transfer data to third party suppliers for the purposes of producing personalised direct mail materials (see above).
- Send both generic and personalised content by mail - and, where the individual has given explicit permission, by e-mail.
- Retain the individuals' data for as long as the relationship lasts with SLA, for marketing, business analysis and administration purposes.
- We will only record and store personal data with the knowledge of the individual.
- We will only use personal data with the permission of the individual.
- We will not send marketing or fundraising information directly to children.
- We will not use external data sources to enhance the personal data we store.
- We will not use marketing data obtained from a third party without proof of third party consent for mailing having been obtained by the data owner

## **Nature of personal information held by SLA**

- Title, full name, address, postcode.
- E-mail address (if provided and opted in for contact).
- Telephone number (if provided and opted in for contact).
- Transactional data relating to the donation payment dates and amounts.
- Bank details are held securely only for processing Direct Debits or Standing Orders. Direct Debit payments are protected by the Direct Debit Guarantee.
- Card details are not retained for one-off donations or purchases.

## **Primary relationships**

The individuals whose details SLA holds fall into these primary categories. They may be active or lapsed. SLA claims legitimate interest as outlined above for the purposes of communications to reactivate lapsed supporters for income generation purposes.

Former employees' and former volunteers' data will be dealt with according to the requirements of GDPR:

- Donors
- Non-transactional supporters
- Volunteers
- Employees
- Suppliers/contractors

Please direct any queries regarding this statement to [enquiries@sla-india.org](mailto:enquiries@sla-india.org).

## **The full legal information for SLA is:**

Scottish Love in Action,  
Greyfriars Charteris Centre,  
138-140 The Pleasance,  
Edinburgh  
EH8 9RR

Scottish Charity Number: SCO30516

Company number: SC280397

**Other contact details:**

Telephone: 0131 629 9112

Email: [enquiries@sla-india.org](mailto:enquiries@sla-india.org)