



## Privacy Notice - Website

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## 1.0 Who are we?

SiMBA is a Scottish registered Charity that uses the trading name of SiMBA (referred to as "SiMBA", "we", "our" or "us" in this notice).

The registered office is McSence Business Park, 32 Sycamore Rd, Mayfield, Dalkeith EH22 5TA.

Scottish Registered Charity Number: SC038243

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## 2.0 Overview

Maintaining the security of your data is a priority at SiMBA, and we are resolute in respecting your privacy rights. We commit to handle your data fairly and legally always. SiMBA is also dedicated to being transparent about what data we collect about you and how we use it.

This notice, which applies whether you use our services, use your mobile device or access our sites from any internet enabled device, provides you with information about:

- how we use your data
- How we share data
- How long your data is retained
- what personal data we collect
- how we ensure your privacy is maintained
- your legal rights relating to your personal data

## 3.0 How we use your data

### 3.1 General

SiMBA uses your personal data:

- to provide a range of services to you
- to make our website and other social media content available to you
- to verify your identity
- for crime and fraud prevention, detection and related purposes (if mandated by law)
- with your agreement, to contact you electronically about promotional offers and services which may interest you
- for market research purposes and to better understand your needs
- to enable SiMBA to manage service interactions with you
- where we have a legal right or duty to use or disclose your information (for example in relation to an investigation by a public authority or in a legal dispute)

### 3.2 Newsletters and updates about SiMBA activities

We use your personal data for electronic marketing purposes (with your consent) and may send you posted mail or electronic messages to update/inform you on the latest news or events of interest.

You have the right to opt out of receiving promotional communications at any time, by:

- making use of the simple "unsubscribe" link in emails
- contacting us via the contact channels set out in this notice.

### 3.3 Web banner advertising

If you visit our websites, you may receive personalised banner advertisements whilst browsing other websites. Any banner advertisements you see will relate to products you have viewed whilst browsing our websites on your computer or other devices.

### 3.4 Cookies on our website

Our websites use cookies to collect information. This includes information about browsing behaviour by people who access our website, the pages viewed and the customer journey around our site.

Our websites not knowingly used for 3<sup>rd</sup> party advertising.

You can remove or disable cookies at any time - see our cookie policy for further information.

## 4.0 How we share data

### 4.1 Our service providers and suppliers

In order to make certain services available to you, we may need to share your personal data with some of our service partners. These include HMRC, cloud storage and IT providers.

SiMBA only allows its service providers to handle your personal data when we have confirmed that they apply appropriate data protection and security controls. We also impose contractual obligations on service providers relating to data protection and security, which mean they can only use your data to provide services to SiMBA and to you, and for no other purposes.

### 4.2 Other third parties

Apart from our service providers, SiMBA will not disclose your personal data to any other third party unless we are legally obliged to do so. We will never sell or rent our customer data to other organisations for marketing purposes.

We may share your data with: -

- credit reference agencies where necessary for card payments
- governmental bodies, regulators, law enforcement agencies, courts/tribunals and insurers where we are required to do so
- to comply with our legal obligations
- to exercise our legal rights (for example in court cases)
- for the prevention, detection, investigation of crime or prosecution of offenders
- for the protection of our employees and other users of our services

## 5.0 International transfers

To deliver a full range of services to you, it may be necessary for SiMBA to share your data outside of the UK. This will typically occur when service providers are located outside the UK or if you are accessing our services from outside the UK. These transfers are subject to special rules under data protection legislation.

If this happens, we will ensure that the transfer will be compliant with data protection law and all personal data will be secure. Our standard practice will be to use 'standard data protection clauses' which have been approved for such transfers, often abbreviated to SCC's.

The SCCs contain contractual obligations on the data exporter and the receiver, and rights for the individuals whose personal data is transferred. Individuals can directly enforce those rights against the data importer and the data exporter.

## 6.0 How long your data is retained

We will not retain your data for longer than necessary for the purposes set out in this notice. Different retention periods apply for different types of data, however the longest we will normally hold any personal data is 7 (seven) years.

## Page | 4 7.0 What types of personal data do we collect

SiMBA may collect some or all the following information about you: -

- your name, age, date of birth and gender
- your contact details: postal address, telephone numbers (including business, personal & mobile numbers) and e-mail address
- your on-line browsing activities on the SiMBA website
- your communication and marketing preferences
- your interests, preferences, feedback and survey responses
- your location
- your correspondence and communications with us
- other publicly available personal data, including any which you have shared via a public platform (such as a LinkedIn profile, Twitter feed or public Facebook page)

What is actually collected will be clear and only asked for if you wish to enquire about or access our services and send us an email or complete one of our forms online or on paper.

Our website is not intended for children (under 18 years of age), and we do not knowingly collect data relating to children.

This list is not exhaustive, and, in specific instances, we may need to collect additional data for the purposes set out in this notice. Some of the above personal data is collected directly, for example when you engage with us. Other personal data is collected indirectly, for example your browsing activity. We may also collect personal data from third parties who have your consent to pass your details to us, or from publicly available sources.

## 8.0 How we protect your data

### 8.1 Our controls

SiMBA is committed to keeping your personal data safe and secure.

Our security measures include: -

- encryption of data
- Implementing risk management and data impact assessment analysis
- regular cyber security assessments of all service providers who may handle your personal data
- security controls which protect our IT infrastructure from external attack and unauthorised access
- internal policies setting out our data security approach and training for staff

### 9.0 How you can help protect your data

We will never ask you to confirm any bank account or credit card details via email. If you receive an email claiming to be from SiMBA asking you to do so, please ignore it and do not respond to it.

If you are using a computing device in a public location, we recommend that you always log out and close the website browser when you complete an online session.

In addition, we recommend that you take the following security measures to enhance your online safety: -

- Keep your account passwords private. Remember, anybody who knows your password may be able to access your information
- When creating a password, use at least 16 characters. A combination of letters, symbols and numbers is best. Or use a combination of unrelated words. Try not to use easy to guess words like your name, email address, or other personal data that can be easily obtained. Hackers will often find information about you from social media sites so be careful what information you publish
- We also recommend that you frequently change your passwords
- Avoid using the same password for multiple online accounts

### 10.0 Accessing your Personal Data

You have a number of rights: -

- the right to ask what personal data that we hold about you at any time
- the right to ask us to update and correct any out-of-date or incorrect personal data that we hold about you
- the right to opt out of any marketing communications that we may send you

If you wish to exercise any of the above rights, please contact us using the contact details set out below.

Further information can be found on the [Information Commissioners website](#)

### 11.0 Legal Basis for processing Personal Data

#### 11.1 General

SiMBA collects and uses customers' personal data because is it necessary for: -

- the pursuit of our legitimate commercial interests
- the purposes of complying with our duties and exercising both your and our contractual obligations
- complying with our legal obligations

#### 11.2 Consent

In general, we only rely on consent as a legal basis for processing in relation to sending direct marketing communications to customers via email or text message.

Individuals **have the right to withdraw consent at any time**. Where consent is the only legal basis for processing, we will cease to process data after consent is withdrawn.

### 11.3 Our legitimate interests

This legal basis for processing personal data, is that it is necessary for the legitimate interests of SiMBA Charity, including: -

- promoting and supplying services to our service users
- protecting service users, employees and other individuals and maintaining their safety, health and welfare
- promoting, marketing and advertising our products and services
- understanding our contacts' behaviour, activities, preferences, and needs
- improving existing products and services and developing new products and services
- complying with our legal and regulatory obligations
- preventing, investigating and detecting crime, fraud or anti-social behaviour and prosecuting offenders, including working with law enforcement agencies
- handling service user contacts, queries, complaints or disputes
- managing insurance claims
- protecting SiMBA its employees and service users, by taking appropriate legal action against third parties who have committed criminal acts or are in breach of legal obligations to us and our staff
- effectively handling any legal claims or regulatory enforcement actions taken against us
- fulfilling our duties and obligations to our service users, colleagues, donors, beneficiaries and other stakeholders.

### 12.0 Contacting SiMBA

If you have any questions about how we use your personal data that are not answered here, or if you want to exercise your rights regarding your personal data, please contact us by any of the following means:

- phone us on: - 0131 353 0055
- e-mail us at: [enquiries@simbacharity.org.uk](mailto:enquiries@simbacharity.org.uk)
- write to us at: - SiMBA Charity,  
Units 6&7 Colliery Court,  
McSence Business Park,  
32 Sycamore Road,  
Mayfield EH22 5TA
- using the [Get in Touch](#) page on our website
- If you are not satisfied, after attempting to ask us to resolve a dispute, you have the right to lodge a complaint with the Information Commissioner's Office.
- Further information, including contact details, is available at <https://ico.org.uk>