

Privacy Policy

Your privacy is important to us and we are committed to safeguarding the personal data of our members, hostellers and website visitors.

We want to be clear about the data we collect and process and we have updated our Privacy Notice to reflect the high standards established with the new EU General Data Protection Regulation (GDPR).

This privacy policy explains what to expect when we collect your personal information, including your individual rights and our obligations.

Policy introduction

This introduction explains what data we collect by virtue of our interactions with us. These include: staying at our hostels, requesting information about our hostels, joining the Trust as a member, making a donation, making a complaint or suggestion for improving our services, participating in a work party, requesting that we return your property left at our hostels, attending one of our meetings, requesting payment of hostel fees.

Staying at our hostels

We take no bookings at our hostels. Our web site is not transactional. (see [cookies](#) below)

If you email us requesting information about our hostels, making a complaint or suggestion for improving our services we only use you email address to respond to your questions and to bring our conversation to a satisfactory conclusion. We send you information the hostels and details of membership together with a GDPR. If you wish to be placed on our mailing list for receipt of further information about our hostels we ask you to complete and return a consent form.

At the hostel, in order to confirm your stay, we ask you to complete the hostel register with your name, the date and length of your stay. We ask you to register the hire of any sheet sleeping bags and if you are camping (as our fee for camping is lower). We also ask for your age, if under 18 because our overnight fees are lower for under 18s. If you wish to receive a copy of our annual Crofters Newsletter we ask you to write your full postal address or email address on one of the comment cards and place it in the honesty box.

If you leave your payment in one of the envelopes provided we ask you to state your name and address (email and postal), the date of your stay and number of nights you have stayed. If you wish to receive a copy of our annual Crofters Newsletter we ask you to tick the box "Crofters Newsletter I consent."

Any other personal information which we collect about you as a consequence of you having any dealings with us by email, telephone, or letter is handled in accordance with this privacy policy. This includes asking for information about the hostels, commenting or complaining about our hostels, enquiring or attending a work party or attending our AGM or members forum.

From time like minded third party organisations ask if they can include a flier about their activities in our mailing. Such literature is added to one of our normal mailings; your details are not given to that third party organisation.

The General Data Protection Regulation (GDPR) sets out your rights as a consumer in respect of information held about you by businesses.

In summary

- We will not collect your Personal Information without your knowledge or in a manner inconsistent with this policy
- We do not share your Personal Information with any third parties outside the Gatliff Hebridean Hostels Trust and the Gatliff Trust.
- We will send you a copy of the information we hold on you, correct or remove your Personal Information and other information that is accessible at any time.
- We will take reasonable steps to protect the security of the Personal Information we collect from you

The remainder of this policy describes how we will treat your personal information.

Legitimate interests pursued by the Gatliff Hebridean Hostels Trust and the Gatliff Trust.

The information which we may hold about you

- Personal details such as title, name, nationality, age, postal address, email address and contact telephone numbers. This also applies when you make an enquiry or complete the hostel register on behalf of other people
- Information you provide regarding your mailing communication preferences.
- The source of the information we hold about you
- Information submitted to us when enquire about our hostels, when you stay at one of our hostels or complete a comment card or honesty envelope.
- Information provided by you to us whilst attending / visiting a Gatliff Hebridean Hostels Trust stall or event
- Information provided by you as a consequence of participating in one of our work parties.
- Information collected automatically when visiting the website Gatliff.org.uk (see Cookies section for more information).

Please note that when you submit your personal information and any necessary information relating to other people, you're confirming that you have permission to do so and have read and agreed the terms and conditions of this privacy notice.

The purpose for which we hold and may use your information

- For the provision of our hostels to you
- For the supply of literature which you request.
- Membership: to send member communications including newsletters and AGM information including a proxy form on which you may vote in Gatliff Hebridean Hostels Trust Executive Committee elections.
- Dialogue with you until you unsubscribe (which you can do at any stage).
- These communications include our newsletter containing news from our hostels, appeals for funds and details of work parties.

- Other communications: we may send you on-line surveys relating to improving Gatliff Hebridean Hostels Trust overall member and hostel services
- We may need to respond in relation to a query or complaint you may raise with us and to check on the level of service we provide.
- Financial: to process transactions and payments
- Legal purposes: In certain cases, we may need to use your information to handle and resolve legal disputes, and for regulatory purposes.

Investigations and compliance.

- Fraud detection and prevention: we may use your personal information for the detection and prevention of fraud and other illegal or unwanted activities
- We provide your information to the local police if they are seeking a missing person. (The police have powers to require us to provide information in certain circumstances.)
- Improving our services: finally, we use your personal information for analytical purposes, to improve our services, to enhance the user experience, and to improve the functionality and quality of our website.

Images

The Gatliff Hebridean Hostels Trust will use imagery in the course of their operation within media, print, publications such as the Hebridean Hosteller newsletter, the Newsletter of the Crofters' Hostels and social media channels. At all times the relevant prior consent will have been obtained,

Data Transfers

The Gatliff Hebridean Hostels Trust will not transfer personal data to unless they are within the EEA or a country with an adequate level of data protection as defined by the European Commission.

Cookies

The website Gatliff.org.uk uses "cookies". Cookies are small pieces of information which are sent by a website to your web browser and remain on your computer until they are deleted. If you do not wish to receive such cookies from us, please adjust your browser's settings accordingly (See "Adjusting your Browser's Cookie Settings" below). Please note however that this may restrict your use of the website Gatliff.org.uk)

Adjusting your browser's cookie settings

Adjusting your browsers cookies is dependent on the Internet browser being used. The Help feature on most browsers will tell you how to prevent your browser from accepting new cookies. Alternatively you should check with the vendor whose browser you are using for specific details on how to do this.

Protecting your information

The security of your personal information is important to us and we are committed to keeping data safe and secure. We have in place a number of security measures to protect against any unauthorised access or damage to, or disclosure or loss of, your personal information. However, all publicly accessible websites are susceptible to malicious practices, and we accept no liability if security is breached. Please note that as our website does not collect any of your personal information or email address, or involve and financial transactions, the impact of any breach will have only limited or no impact on your personal.

We do not broker or pass on information gained from your engagement with us without your consent. However, we may disclose your Personal Information to meet legal obligations, regulations or valid

governmental request. We may also enforce our Terms and Conditions, including investigating potential violations of our 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 the Gatliff Hebridean Hostels Trust, our people, our hostellers and/or the wider community.

We further undertake that we will not hold information about you which is excessive in respect of the purposes for which it is processed.

Your consent

There is a notice on the home page of our website which describes how we use cookies and which also provides a link to our Privacy Policy. If you use this website after this notification has been displayed to you we will assume that you consent to our use of cookies for the purposes described in this Privacy Policy.

Who will hold your information

Your information will be held by the Gatliff Hebridean Hostels Trust (also known as the GHHT and Gatliff Trust). The Gatliff Hebridean Hostels Trust has its registered office at 30 Francis Street, Stornoway, Isle of Lewis, HSI 2ND. The Gatliff Hebridean Hostels Trust is called the “Data Controller” because it has control over and responsibility for your personal information.

The Gatliff Hebridean Hostels Trust is the owner of the website www.gatliff.org.uk

Keeping your information up to date

If any of the information that you have provided to the Gatliff Hebridean Hostels Trust changes, for example if you change your email address, name or bank details paying your membership subscription please contact us by email to ghht@gatliff.org.uk

In order to help the Data Controller keep your information up to date registered users may be asked to provide details of any changes in their information at regular intervals.

Retention Policy

Unless you have consented to receiving information, the period of use of the personal data supplied by you to fulfil our contract will be held in accordance with the terms of our agreement such as membership and statutory legislative retention periods.

Data storage

Data is held in The United Kingdom using different (multiple) computers. Gatliff Hebridean Hostels Trust does not store personal data outside the EEA.

Your rights as a data subject

At any point whilst the Gatliff Hebridean Hostels Trust 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.

The Gatliff Hebridean Hostels Trust, at your request in writing can confirm what information it holds about you and how it is processed.

You can request the following information

- Contact details of the data protection officer, where applicable.
- The purpose of the processing as well as the legal basis for processing.
- If the processing is based on the legitimate interests of the Gatliff Hebridean Hostels Trust or the Gatliff Trust 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.
- Any details and information of automated decision making, such as profiling, and any meaningful information about the logic involved, as well as the significance and expected consequences of such processing.

To access what personal data is held, you will need to complete a 'Subject Access Request' form and identification will be required

All requests should be made in writing to Gatliff Hebridean Hostels Trust to; Data Protection Officer, Gatliff Hebridean Hostels Trust, 30 Francis Street, Stornoway, Isle of Lewis HS1 2ND email ghht@gatliff.org.uk .

The Gatliff Hebridean Hostels Trust will require copies of two forms of ID including one piece of photographic ID in order to fulfil any 'Subject Access' Request.

Forms of ID acceptable include your national ID card, driving license, passport, birth certificate and a utility bill not older than three months.

If the Gatliff Hebridean Hostels Trust is dissatisfied with the quality of the identification, further information may be sought before personal data can be released.

Information will be provided within 30 days of receipt of the written request to the Data Protection Officer.

In the event that the Gatliff Hebridean Hostels Trust 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.

Complaints

If you have any queries about the process or how the Gatliff Hebridean Hostels handles your information, you should bring this to our attention without any delay so that we can deal with your concerns and queries. We would also welcome any suggestions for improving our process and procedures.

In the event that you wish to make a complaint about how your personal data is being processed please contact the Gatliff Hebridean Hostels Trust. If you do not get a response within 30 days you can complain to the Data Protection Regulator.

Data Protection Officer, Gatliff Hebridean Hostels Trust, 30 Francis Street, Stornoway, Isle of Lewis HSI 2ND

E: ghht@gatliff.org.uk

Data Protection Regulator

Information Commissioner's Office (ICO), Wycliffe House, Water Lane, Wilmslow, SK9 5AF

T: 0030 123 1113

Data Protection breach

Should there be a data breach the Gatliff Hebridean Hostels Trust will inform the ICO within 72 hours. The information provided the ICO will include;

- What has happened
- When and how we found out about the breach;
- The people that have been or may be affected by the breach;
- What we are doing as a result of the breach

Contact Us: Data Protection Officer

If you require further information or have any questions regarding this Privacy Policy, please contact us at:

Data Protection Officer
Gatliff Hebridean Hostels Trust
30 Francis Street
Stornoway
Isle of Lewis
HSI 2ND

E: ghht@gatliff.org.uk

Changes to our Privacy Policy

Our privacy policy is reviewed on a regular basis and was last updated on 30th June 2018.

Definitions

The Gatliff Hebridean Hostel Trust. Registered Office: 30 Francis Street, Stornoway, Isle of Lewis HSI 2ND
Charity no: SC013660 A Company limited by guarantee Registered no 111557 Scotland

The Gatliff Trust. Registered under the Charities Act, 1960, No. 202782 C/o 264 Alexandra Park Road,
LONDON N22 7BG

This policy applies to both Trusts and all those Trustees who handle the data which is the subject of this privacy policy.