

Clan MacEwen Society SCIO Data Protection Notice

1. Introduction

This privacy notice (Notice) explains how the Clan MacEwen Society SCIO (The Society, we, us) processes your personal data, and your rights in relation to the personal data we hold. The Society is a UK- based organisation and is therefore bound by data protection laws applicable in the United Kingdom.

This Notice may be updated from time to time; however, any major changes will be notified directly to those affected wherever practicable and published on our website www.ClanMacEwen.com. This Notice is effective from **April 2026** when it was last updated.

2. Data controller and contact details

The Society is the data controller of your personal data, if you have any questions about how the Society uses your personal data, whom we share it with, or if you wish to exercise any of the rights set out in this Notice, please contact us using the following email address info@ClanMacEwen.com

3. How we collect your information

We may collect your personal data in a number of ways, for example:

- Directly from you, for example, when you apply for Society membership, book and attend our events, participate in a survey; enter a competition and when you interact with us in various other ways including by phone, post, email or other online platforms;
- From the information you provide to us when you meet with one of our officers, members or representatives;
- When you make enquiries.

From time to time, we may receive information on potential sponsors and partners from third parties or from our own research. Where deemed necessary, as part of our due diligence, we may seek information from third party sources before committing to working together with them.

4. The types of information we collect

We may collect the following categories of personal data about you:

Where you have applied for membership, we will collect your name, address, contact details including email address and telephone number and any other personal information that has been included in the application form; and

- Image data, photographs, sound recordings and videos (if we have taken them at our events or activities and you have not objected to us doing so);
- Information concerning your engagement with us, including records of communications between you and us and your attendance at our events and meetings;
- Your opinion and feedback that you provide on our events;
- Special category data (e.g. data concerning health / dietary requirements etc). From time to time, we will process special category data for the following purposes:
- We may collect health data in order to ensure all possible allowances are made at events (for example, disabled access, dietary requirements etc).

Clan MacEwen Society SCIO Data Protection Notice

5. The legal bases for processing your data, how we use that data and with whom we share it

We will only process your data on a lawful basis. The lawful bases include:

5.1 Where we have a contractual relationship with you

We may process your personal data because it is necessary for the performance of a contract with you, or to take steps at your request prior to entering into such a contract. For example, we need to process personal data in order to comply with the terms and conditions of The Society membership and the terms and conditions applicable to the use of our Website. In this respect we use your personal data for the following: Society Privacy Notice

- To process membership applications and enquires in respect to membership;
- To administer your attendance at meetings and events (unless an event is free to attend in which case the legal basis will be our legitimate interests);
- To provide you with communications of general interest and relevance and updates under the terms of your membership.

In this respect, we may provide your personal data to the following:

- The Society and Clan Leadership, Society officers, Secretary and Committee members.
- Our IT support, including website host, cloud storage provider, our email and mail service providers,
- Third party suppliers, for example venue and catering providers, publishers of our bulletin / newsletter.

5.2 Legitimate interests

We may process your personal data because it is necessary for our or a third party's legitimate interest. Our legitimate interests include pursuing our mission to increase participation in Society and the Clan and to represent MacEwen's within our geographic scope in a way that promotes Scottish culture and clan culture. Our interests will always be weighed against your rights, interests and expectations. In this respect, we use your personal data for the following:

- To run events, hold meetings and elect members to positions within the Society;
- To administer our activities as a Clan Society including providing networking, social events and training;
- To administer surveys in connection to Society activities and events;
- To use your likeness (including video and sound recordings), or an attributed quote in our newsletters, on our website or in other materials that promote our work (except where it is appropriate to seek your consent);
- To conduct marketing about our events and activities (except where it is appropriate to gain your consent); and to process any enquiries in relation to Society activities.

In this respect, in addition to the recipients named in the section above, we provide your personal data to our professional advisers where it is necessary to obtain their advice or assistance.

Clan MacEwen Society SCIO Data Protection Notice

5.3 Legal obligations

In some cases, we may need to process your personal data in order to comply with our legal and regulatory obligations. In this respect we may use your personal data to comply with subject access requests of others, tax legislation, for the prevention and detection of crime, and to assist the police and other competent authorities with investigations (including criminal investigations).

5.4 Consent

In some circumstances we may seek your specific consent to process your personal data: for example, we will obtain your consent to send you our newsletters or other marketing emails where it is appropriate to do so.

We will not store information on any child member under the age of 13 without the consent of a parent or guardian.

If you have given your consent and you wish to withdraw it, please contact us using the contact details above.

6. International transfers

Our current Chair, Vice Chair, Secretary, Membership Secretary and Treasurer have access to personal information. Personal information will only be transferred outside of the UK if appropriate UK-GDPR compliance practices are in place. We may also transfer your personal data outside the UK in respect to international events. In such cases we will ensure that such transfers are conducted in compliance with data protection legislation.

7. How do we protect your data?

The Society takes the protection of your data very seriously. We use appropriate technical and organisational precautions to keep your data safe and secure. We limit access to your personal information to ensure it is processed in an authorised manner. However, please note that transmission of information on the internet is not completely secure, and we cannot guarantee the security of your data transmitted to us. Once received, we take all reasonable steps and security features to try to prevent unauthorised access.

8. Retention of your data

We will retain your personal data for only as long as is necessary to fulfil the purposes set out in this Notice and for our legitimate business purposes after the termination of your relationship with us. On expiry of the relevant retention period, your personal data will be deleted, suppressed or anonymised, as applicable.

If you are a member, we will keep your membership details throughout your period of active membership and 12 months after membership has ceased (to allow us to contact you following the initial lapse) and then limited to retain your name and last date of membership noting you are no longer a member, for at least 6 years. Details for Life members will be stored until additional information is received.

Clan MacEwen Society SCIO Data Protection Notice

9. Cookies

Cookies are small data files that are sent to and stored on your computer or mobile device from our Website. The Society may use cookies to improve the functionality of our Website. We do not currently use cookies for analytical or advertising purposes. Your browser software should however enable you to block cookies if you wish to.

10. Your rights

You have the following rights concerning your personal data:

- To obtain access to, and copies of, the personal data that we hold about you;
- To request that we erase your personal data;
- To request that we restrict our data processing activities;
- To receive from us the personal data we hold about you which you have provided to us, in a commonly used format specified by you, including in certain circumstances for the purpose of you transmitting that personal data to another data controller;
- To require us to correct the personal data we hold about you if it is inaccurate. We want to ensure that the personal data we hold is accurate. Please tell us about any changes. It is your responsibility to ensure you send accurate information and to update us if the information changes.

Please note that the above rights are not absolute, and we may be entitled to refuse requests where exceptions apply, for example, if we have reason to believe the personal data that we hold is accurate or we can show our processing is necessary for a lawful purpose set out in this Notice.

If you are unhappy with how we are processing your personal data please contact us, you can also make a complaint to the UK's Information Commissioners Office (ICO) (www.ico.org.uk), although the ICO advises that you should try and resolve any issues with us first.