## RHASS privacy policy

The privacy and security of your personal data is very important to us. This privacy policy sets out the ways in which we collect, use, maintain and disclose your personal data whether as a Member of the Royal Highland & Agricultural Society of Scotland ('RHASS'), a volunteer, exhibitor, competitor or sponsor at the Royal Highland Show or Showcase, a user of our websites, social media or other digital platforms or an attendee of events at the Royal Highland Centre. This privacy policy will be updated from time to time.

## 1. Who are we?

In this policy, 'we', 'us' and 'our' refers to the Royal Highland & Agricultural Society of Scotland, our wholly-owned subsidiary Highland Centre Limited, which carries on a range of commercial trading activities to generate income for RHASS's charitable purposes, and the Royal Highland Education Trust, our affiliated education charity (together, 'the Group').

## 2. What data do we collect?

## a. RHASS Members

We collect personal information including your name, address, date of birth, email address, occupation, telephone and mobile numbers and financial information in order to process and service your membership.

Your involvement with us may result in personal data being created; this could include details of your involvement with us by volunteering or donating to a particular cause.

If you buy a membership as a gift, or are the parent of one of our junior members, your details will be recorded and your association with that member will be recorded.

We sometimes conduct research and analysis on information we hold, which can, in turn, generate personal data. We may also buy anonymous external data (e.g. from MOSAIC) and combine this with your personal data at an aggregate level to help us work out what you're most likely to want to hear from us about and how.

# b. Attendees at events at the Royal Highland Centre (RHC), including the Royal Highland Show and Showcase

We collect personal information about visitors, volunteers (including judges and stewards), exhibitors, competitors and sponsors including name, address, date of birth, email address, occupation, telephone and mobile numbers and financial information as appropriate in order to effectively facilitate your involvement with us. Your involvement with us may result in personal data being created.

We sometimes conduct research and analysis on information we hold, which can, in turn, generate personal data. We may also buy anonymous external data (e.g. from MOSAIC) and combine this with your personal data at an aggregate level to help us work out what you're most likely to want to hear from us about and how.

Filming and photography takes place at the Royal Highland Show and Showcase. We will provide notices at the Show and Showcase to indicate that filming/photography is taking place. The film footage and/or photographs may be used for promotional, educational, marketing, archival and communications purposes and may also be streamed live and downloadable and published on our websites, print and social media and other digital platforms. Our legal basis for processing personal data in film footage and photographs is legitimate interests. Legitimate interests means that we need to process the personal data to fulfil our objectives, we believe it will not adversely affect you and we think you would expect it. If you do not wish to appear in such images, please write to us (see Contact Us section).

Attendees at events at the RHC may be required to prove their age for any age-restricted event or activity or to submit to a search to prevent prohibited items being brought into the RHC. In such cases we, or a security company working on our behalf, may take your personal details including

name, address, date and place of birth. These details may be shared with Police Scotland and other entities within our group.

We record details of any public safety, medical or welfare incidents, including personal data of those involved in the event including witnesses, on our internal systems.

#### c. Websites, social media and other digital platforms

We collect personal information when you visit or engage with us on our websites (www.rhass.org.uk, www.royalhighlandshow.org, www.royalhighlandshowcase.org and www.royalhighlandcentre.co.uk) including by placing an order, filling out a form and in connection with other activities, services, features or resources make available on our sites. We also collect personal information on social media or other digital platforms including Facebook, LinkedIn, Twitter, Instagram and Campaign Monitor. This may include, as appropriate, your name, address, date of birth, email address, telephone and mobile numbers and financial information.

#### Cookies, non-personal identification information and third party websites

Cookies are small text files placed on your computer or device by websites you visit. They are used to improve your experience as a visitor, and make websites function properly or more efficiently. For more information on our use of cookies please see our Cookie Policy.

We may collect non-personal identifying information when you interact with us on websites, social medial and other digital platforms.

Our website and other digital medial platforms may, from time to time, contain links to third party websites. If you follow a link to any of these websites, please note that we cannot accept any responsibility or liability for those policies. Please check the privacy policies of these websites before you submit any personal data to them.

#### d. Award and grant applicants

We collect personal information about applicants and recipients for grants and awards including name, address, date of birth, email address, telephone and mobile numbers, occupation, employer information and RHASS membership number as appropriate.

## e. Competition entrants (not Royal Highland Show or Showcase)

We collect personal information about competition entrants including name, address, date of birth, email address, telephone and mobile numbers and RHASS membership number as appropriate.

#### f. CCTV images

We collect CCTV images of those visiting the Royal Highland Centre (including those attending the Royal Highland Show, Showcase and other events).

#### g. Marketing and Fundraising

See section 5 below.

## 3. Young People's data

We will not make fundraising calls or send fundraising emails to young people. We may send young people information on member benefits and volunteering and competition opportunities at the Royal Highland Show.

#### a. RHASS Members

Young people under the age of 18 can join RHASS as a junior member. We collect the junior member's name, address and date of birth. We also collect an email address, telephone and mobile number in order to process and service that membership. These will either be the contact details of the junior member or the contact details of their parent or carer.

## b. Royal Highland Show

For young people entering the Tram Trail Competition at the Royal Highland Show, we collect and store your name, mobile number and/or email address for the purposes of administering the competition.

For young people volunteering or competing at the Royal Highland Show or Showcase we collect and store your name, address, date of birth, email address, occupation, telephone and mobile numbers

and financial information as appropriate for the purposes of effectively facilitating your volunteering and administering the competition and informing you of future volunteering and competition opportunities.

## c. Website and other digital and media platforms

We do not target the provision of information society services at children.

## 4. How we use your personal data

We only use your personal data as permitted under the EU General Data Protection Regulation (the GDPR), the Data Protection Act 2018 and the Privacy of Electronic Communication Regulation 2003 (together, the 'Data Protection Legislation').

## a. RHASS Members

We use the personal data you provide as a member to service your membership. This includes keeping you informed about RHASS and our work, sending you tickets to the Royal Highland Show and ancillary information, sending membership renewal information and processing payments. We do this to fulfil our contract with you as a member. RHASS Directors review membership lists from time-to-time to ensure information on members is accurate and kept up to date.

As a member, you will be invited to participate in the election of Directors in accordance with the Bye-Laws. Candidates in geographical areas where an election is to be held are provided with the contact details of members within that area in order to canvass support.

We sometimes conduct research and analysis on information we hold in order to ensure our membership offering remains relevant and to inform future developments. We may combine this data we hold with other freely available information to better understand supporter interests and preferences.

## b. Attendees at events at the RHC, including the Royal Highland Show (RHS) and Showcase

#### Volunteers

We use the personal data you provide to facilitate your effective volunteering at the Royal Highland Show or Showcase and to inform you about future volunteering opportunities.

#### RHS or Showcase Exhibitors, Sponsors and Event Promoters

We use the personal data you provide to fulfil our contract with you and keep you informed about the event, RHASS and RHC.

#### Competitors

We use the personal data you provide to fulfil our agreement with you and administer the relevant competition. The details of competition winners will be published in the Society Magazine (which is sent to all RHASS Members) and may be published in other media for promotional purposes. We will also process your personal data to keep you informed about future competition opportunities

#### Visitors

We use the personal data you provide as appropriate in order to effectively facilitate your involvement with us. Your involvement with us may result in personal data being created.

Where you have been asked to prove your age or submit to a search, we use the personal data provided to assess whether you may enter the event or take part in an age-restricted activity and we may share that data with Police Scotland for the purposes for crime prevention or detection.

Details of any public safety, medical or welfare incident may be shared as appropriate within our Group and with our welfare and medical providers and Police Scotland.

#### c. Websites

Personal data collected on our websites may be used for the following purposes:

- To process payments in relation to an order;
- ) To run a promotion, contest, survey or other feature;

J To update you on an order, respond to your query or request and keep you informed about future events or our work. This will always be in accordance with Data Protection Legislation and with your consent where necessary.

## d. Award and grant applicants

We use the personal data you provide in order to administer the application.

Winners of awards and grants may have their details published in Society magazine and/or the RHASS website and may be asked to take part in wider publicity.

RHASS Directors review lists of long-service awards winners from time-to-time to ensure information on these is accurate and kept up to date

#### e. Competition entrants

We use the personal data you provide to administer the competition and to make the identity of winners known in line with CAP Code requirements.

We may contact you about aspects of RHASS' work but will only do this in line with the Data Protection Legislation and with your consent where necessary.

#### f. CCTV images

We use CCTV images for the purposes of detecting and preventing crime and ensuring the safety of the public, monitoring congestion and footfall. CCTV images may be shared with partner agencies, including Police Scotland.

## g. Marketing and Fundraising

See section 5 below.

Where consent is required for certain types of processing, we will only process your data where we have that consent.

## 5 Marketing and Fundraising (RHASS)

We would like to use your details to keep in touch about things that may matter to you.

RHASS fundraises from, and partners with, individuals, companies and foundations who want to support RHASS in its mission to promote and support Scotland's land-based and allied industries, to fulfil its charitable aims and to build on its heritage to ensure a sustainable and successful legacy for RHASS, its members and the wider public.

We would like to communicate with you about such matters, including by email or text if you have consented to receive such information in this way.

We may invite you to support our vital work by getting involved with a campaign, making a donation, getting involved in fundraising activities or leaving a gift in your will.

We may collect personal information to conduct supporter research and we may also analyse information you provide to us with other freely available public information to create a profile of supporter interests, preferences and level of potential donations so that we can contact you in the most appropriate way and with the most relevant information.

Before contacting you, we may use data analysis to interpret your data and predict how likely you are to be interested in or responsive to a particular campaign.

If you make a donation, we will use any personal information you provide to record the nature and amount of your gift, claim Gift Aid where you've told us you're eligible and thank you for your gift. When you interact with us we will note anything relevant and store it securely on our systems.

If you have told us that you are planning to, or are thinking about, leaving us a gift in your will, we will record this information, including any information about how you would like the gift to be directed, if you have told us this.

#### a. Major donors

If you are a current or prospective major donor, we'll provide you with bespoke further details of how we look after your data.

Where we have identified that you may have the capacity and/or affinity to support RHASS at a higher level, we may collect additional information about you and combine, analyse and compile that information into a profile in order to assist us in engaging with you in a more personalised way.

#### b. Members

As a member of RHASS, as well as your four-day pass for the RHS, one of your member benefits is the option to purchase advance tickets at a reduced rate for friends and family. We may also contact you from time-to-time with other great offers connected with the RHS or other events at the RHC.

## c. Royal Highland Show

If you have previously attended the RHS or expressed an interest in hearing about the RHS, we may contact you to tell you more about the RHS or Showcase.

#### d. Sponsors

We may contact you from time to time regarding fundraising and partnership opportunities with RHASS.

You may opt out of your data being combined and analysed for marketing purposes by contacting us as set out in the Contact Us section below.

Please note that we are required to conduct a minimum level of due diligence before seeking or accepting major donations. This means that if you opt out of analysis of your data for due diligence purposes, we may not be able to accept donations from you.

## 6 Third party processors

We may sometimes ask third parties to process personal data on our behalf. This may include the transfer of personal data outside the EEA. We will always ensure that any such processors treat your data securely, in accordance with our terms and requirements under the GDPR.

We do not sell, trade or rent your personal data to third parties outwith the RHASS Group and will only share it with organisations we work with in line with legal requirements.

We may share aggregated and anonymous demographic information (not linked to any personally identifiable information) with our business partners, trusted affiliates and advertisers.

## a. Royal Highland Show

For those exhibiting at the Royal Highland Show or Showcase, we share your personal data with Breed Societies and/or the Horse of the Year Show in order to have entries checked for validity and eligibility. Results are also sent to these bodies so that qualification and awards may be verified.

## 7 How we retain your personal data

We retain personal data properly and securely to enable us to meet legal requirements, business needs and to evidence agreements or events where required. We take appropriate technical and organisational security measures to protect your personal data.

Records containing personal data are retained in accordance with our data retention and disposal policy and procedure.

For some records, such as membership records, we retain limited personal data in our archive for our historical records. If you do not want us to retain your personal data in our historical records then please let us know using the details under 'Contact Us' below and quoting your membership number.

## 8 Your rights

Under the GDPR, you have a number of rights regarding your personal data:

- J To withdraw your consent to processing, where processing is based on consent;
- To object to processing for direct marketing, historical research and statistics and where processing is based on our legitimate interests (we will tell you if that is the case) or to ask us to restrict processing of your personal data;
- $\int$  To request rectification or erasure (in certain circumstances) of your personal data;
- ) To ask us to tell you about the personal data we hold on you (a 'Subject Access Request');

 $\int$  The right to complain to the Information Commissioner's Office.

## 9 Contact us

To notify us of any of the above or to discuss any questions you have about this policy or how we use your personal data, please contact us at <u>dataprotection@rhass.org.uk</u> or to the Society Secretary at Ingliston House, Royal Highland Centre, Ingliston, Edinburgh EH28 8NB.