



The Moray Society Privacy Notice

Who are we?

The Moray Society is a Scottish registered charity (SC017546) and is a company limited by guarantee (Company no. 106529). We also own and operate Elgin Museum. We are registered with the Information Commission under registration number ZB225278.

The Moray Society is committed to protecting the rights and freedoms of data subjects and safely and securely processing their data in accordance with all of its legal obligations, including those under the UK General Data Protection Regulation ('UK GDPR'), the Data Protection Act 2018, the Data (Use and Access) Act 2025 and the Privacy and Electronic Communications Regulations. We process personal data about our employees, members and volunteers and other individuals for a variety of business purposes. This notice sets out how we seek to protect personal data.

This privacy notice tells you about the personal data we may process regarding you when you work with us, volunteer for us, are members and / or receive services from us. In processing this personal data, we are acting as a data controller and, by law, we are required to provide you with information about us, about why we use your data and about the rights you have over your data. Enquiries, requests to exercise your data subject's rights, queries and / or complaints about our processing of your personal data can be made using the contact details below:

- Email: curator@elginmuseum.org.uk
- Post: The Moray Society, Elgin Museum, 1 High Street, Elgin. IV30 1EQ
- Telephone: 01343 543675

We will process any requests to exercise data subjects' rights in accordance with the relevant legislation and generally respond to you within one calendar month. We will acknowledge all complaints within 30 days and revert to you regarding your complaint without undue delay. If you are dissatisfied with our response, you can refer the matter to the Information Commission.

What personal data do we collect?

We will only ask you for personal data that is appropriate and necessary for us to work with you and to effectively provide services we have agreed with you. The personal data may include:

- (i) For customers your name, address, telephone number and email address
- (ii) For volunteers your name, address, telephone number, email address, date of birth, gender, employment status, disability status and any support needs if applicable.
- (iii) For members your name, address, telephone number, email address, date of birth (for junior and young adult memberships) and details of your bank account when you set up a standing order mandate.

Why do we process this personal data?

We will process your personal data to make contact with you about the services we are providing to you and / or the work / volunteering that we are doing with you. We require this information to provide you with an efficient and effective service and to get in touch with you if we have information that could help you individually or your group or organisation. There are also legal obligations that require us to retain certain information for specified periods.

We may also use the personal data to:

- Undertake and perform our obligations and duties in relation to the services we provide
- Enable us to supply you with the services and information that you have requested
- Improve and develop the services we offer
- Keep you updated on any changes to our services
- Monitor our performance in relation to service delivery
- Meet our legal obligations
- Keep you updated on any changes to our services
- Progress all other purposes consistent with the proper performance of our operations and business

If you do not wish to provide your personal data

If you have a contract / potential contract with us, you will need to provide us with certain required personal data. If you do not provide this information, this may prevent our ability to enter into or maintain a contract with you

What do we do with your information?

The Moray Society and Elgin Museum will comply with the data protection principles set out in the UK General Data Protection Regulation (UK GDPR) we do to comply with these principles. These are:

1. Lawful, fair and transparent – data collection must be fair, for a legal purpose and we must be open and transparent about how the data will be used.
2. Limited for its purpose – data can only be collected for a specific purpose.
3. Data minimisation – any data collected must be necessary and not excessive for its purpose.
4. Accurate – the data we hold must be accurate and kept up to date.
5. Retention – we cannot store data longer than necessary.
6. Integrity and confidentiality – the data we hold must be kept safe and secure.

The data we process may be kept in a variety of ways. These may include paper files or electronic files held in cloud-based storage systems. All forms of storage will be legally compliant in terms of security. Your personal data will only be processed in the UK, except where international transfers are in accordance with data protection legislation.

Who do we share your personal information with?

We may disclose your personal data to any of our employees, officers, contractors, insurers, professional advisors, agents, suppliers or subcontractors, selected third parties, insofar as reasonably necessary, and in accordance with data protection legislation.

We may also disclose your personal data:

- With your consent;
- To the extent that we are entitled or required to do so by law;
- If we enter into a joint venture with or merge with another business entity, your information may be disclosed to our new business partners or owners;
- If we are conducting a survey of our products and / or service, your information may be disclosed to third parties assisting in the compilation and analysis of the survey results

- If required by law, we will disclose your information to statutory bodies such as courts and Police Scotland;
- If we are making an insurance claim following an incident, we may share your information with our insurers;
- Unless required to do so by law, we will not otherwise share, sell or distribute any of the information you provide to us without your consent.

What are the legal bases for us processing your personal data?

We will only process your personal data on one or more of the following legal bases:

- contract
- consent
- our legitimate interests, including recognised legitimate interests as set out in the Data (Use and Access) Act 2025
- vital interests
- public interest / official authority
- where we have a legal obligation to do so

Processing special category personal data

Special categories of personal data means information about your racial or ethnic origin; political opinions; religious or philosophical beliefs; trade union membership; health; sex life or sexual orientation; criminal convictions, offences or alleged offences; genetic data; or biometric data for the purposes of uniquely identifying you.

The special categories of personal information referred to above require higher levels of protection. We need to meet additional legal requirements for collecting, storing and using this type of personal information.

How long do we keep your personal data for?

We will keep your information for no longer than necessary and this will vary depending on the type of information we hold and will depend on the circumstances of each case. However, this will be determined in a manner consistent with legal requirements, and / or best practice. Your personal data will be deleted from our system when no longer relevant.

Your rights over your personal data

You have the right at any time to exercise your data subjects' rights in relation to the following:

- the right to be informed
- the right to access
- the right to rectification
- the right to object to processing
- rights in relation to automated decision making and profiling
- the right to be forgotten
- the right to data portability
- the rights to restrict processing

When you make a request, we are required to verify your identity and may ask you for specific information to fulfil this purpose. Normally, you will not need to pay a fee when you make any of the above requests, but we may charge a reasonable fee or refuse to comply if your request for access is clearly unfounded or excessive.

Agreed EMMC: 2 / 8 / 2026

Agreed MSB: 16 / 8 / 2026

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