

## **POLICY**

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### **Introduction**

We take the security and privacy of your personal information very seriously. This privacy policy will give you a clear understanding of what kinds of personal information we collect, how we use the personal information that you provide and our measures for protecting it. The policy will also outline your subject access rights and the options you have to control your personal information and protect your privacy.

## **GENERAL PRIVACY POLICY**

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### **Policy Content:**

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### **1. Who We Are**

This privacy policy applies to **The MDS Estates Ltd** and its subsidiaries and affiliated entities, and are collectively referred to as "**The MDS Estates Ltd**," "we," "us" or "our" in this policy.

Any questions in relation to this privacy policy should be sent to [dataprotection@buccleuch.com](mailto:dataprotection@buccleuch.com) or addressed to Data Protection, 27 Silvermills Court, Henderson Place Lane, Edinburgh, EH3 5DG.

### **2. Personal Information We May Collect About You**

We will only collect the personal information that we need, and this may include:

- Information about who you are e.g. your name, date of birth and contact details
- Information in connection with specific activities such as event registration, donations, volunteering, employment etc.
- Information about your correspondence with us e.g. meetings, phone calls, emails/letters
- Information that is automatically collected e.g. via cookies when you visit one of our websites
- Information that is automatically collected via log files e.g. IP address, browser type, Internet service provider, referring/exit pages, and date/time stamps.
- Information if you visit one of our sites e.g. visual images collected via (CCTV)
- Information classified as 'sensitive' personal information e.g. relating to your health, marital or civil partnership status. This information will only be collected and used where it is needed to provide the product or service you have requested or to comply with our legal obligations.

### **3. How We Collect Your Personal Information**

We collect your personal information in a number of ways, and depends on how you interact with us.

- When you contact us (email, call or write to us).
- When you register for an event or sign up for one of our services.
- When you visit our website or engage with our social media channels.
- When you sign up to receive email updates or our e-newsletter subscription list.
- When you participate in any of our competitions or promotions.
- When you make a purchase from us.

### **4. How We Use Your Personal Information**

We take your privacy and the protection of your personal information seriously, and we will only ever collect and use personal information where it is necessary, fair and lawful to do so. We'll collect and use your personal information for a variety of different purposes, including:

- To respond to any correspondence including your requests, enquiries, or comments.
- To engage with you in relation to any events, promotions, services, etc, that you have signed up for.
- To send you marketing communications on the provision that you have provided consent to do so.
- To process any applications that you send us; volunteering applications, etc.

### **5. How We Protect Your Personal Information**

We take the security of your personal information very seriously. We have adopted appropriate safeguards to ensure the data we collect, store or process, whether on paper, online or any other media, is protected in line with our data protection obligations.

We have implemented appropriate technical and organisational security measures, including on-going training, to protect your personal information against any unauthorised or unlawful processing and against any loss or damage through accident, negligence or deliberate actions.

Our security measures have been developed in line with industry standards and good practice, safeguarding against the risks to the privacy, integrity and availability of your personal information.

### **6. Who We May Share Your Personal Information With**

We do not sell your personal information; however, we do share it with third parties when necessary. When sharing your information, we ensure to maintain control of what they can access, how long they can access and what they are permitted to do.

Where necessary, personal information collected and processed by us may be shared with the following:

- **The MDS Estates Ltd** employees and volunteers.
- Third party hosting and IT infrastructure providers who host the website and provide IT support in respect of the website.
- Third party marketing communication providers.

## **7. How Long We Keep Your Personal Information**

We will only use and store your information for as long as it is required for the purposes it was collected for. How long it will be stored for depends on the information in question, what it is being used for and, sometimes, statutory legal requirements.

We look to find ways to reduce the amount of information we hold and the length of time that we need to keep it. For example:

- We aim to utilise a paperless approach where possible and securely destroy any paper correspondence we receive in accordance with our data retention policy, with the exception where we are required to retain it for evidential or legal purposes.
- We retain a marketing suppression list of individuals who no longer wish to be contacted by us indefinitely. We require this information to comply with their wishes not to contact them in future.

## **8. Your Individual Rights**

There are several rights that as a customer, or employee you have to gain access to or amend the information that we hold on you. These rights are:

- Right to be Informed;
- Right of Access to your data;
- Rights related to automated decision making including profiling;
- Right to object;
- Right to be forgotten / erasure;
- Right to data portability;
- Right to restrict processing;
- Right for your information to be rectified

If you would like further information on your rights, or you wish to exercise the rights mentioned above then please do not hesitate to contact us at:

**Data Protection,**  
27 Silvermills Court,  
Henderson Place Lane,  
Edinburgh,  
EH3 5DG  
Or email us at: [dataprotection@buccleuch.com](mailto:dataprotection@buccleuch.com)

## **9. Our Cookies**

Cookies are small, often encrypted, text files, which are stored on your computer when you visit some websites. They are used to remember useful information which allows certain functionality within the website to work, for example remembering where you have reached within an order process, or if you've logged in to a site. Cookies can't harm your computer. Most web browsers allow some control of most cookies through the browser settings. To find out more about cookies, including how to see what cookies have been set, visit [www.aboutcookies.org](http://www.aboutcookies.org) or [www.allaboutcookies.org](http://www.allaboutcookies.org).

Find out how to manage cookies on popular browsers:

[Google Chrome](#)

[Microsoft Edge](#)

[Mozilla Firefox](#)

[Microsoft Internet Explorer](#)

[Opera](#)

[Apple Safari](#)

To find information relating to other browsers, visit the browser developer's website.

To opt out of being tracked by Google Analytics across all websites,

visit <http://tools.google.com/dlpage/gaoptout>.

## **10. Contact Us**

If you have any questions, would like to report a problem or exercise your subject access right, please contact us by email at [\*\*dataprotection@buccleuch.com\*\*](mailto:dataprotection@buccleuch.com) or in writing at:

### **Data Protection,**

27 Silvermills Court,  
Henderson Place Lane,  
Edinburgh,  
EH3 5DG.

**This Policy was last updated on 22<sup>nd</sup> May 2018.**