

Applecross Community Company: Privacy Notice for Members, Customers and Clients

Introduction

Applecross Community Company (hereafter ACC) takes our privacy and data protection responsibilities seriously. This Privacy Policy sets out how ACC and its trading subsidiary Applecross Community Trading Ltd (ACT) will process personal data in line with requirements of the Data Protection Act 2018. It applies to all records held and managed by ACC and ACT which relate to Members, customers, tenants and leaseholders, and clients etc.

This Notice should be read in conjunction with ACC's Data Protection Policy and Records Retention Policy, available on request.

Definitions

Data Protection Act 2018 – The UK legislation that provides a framework for responsible behaviour by those using personal information.

Data Controller – The person who (either alone or with others) decides what personal information ACC will hold and how it will be held or used.

Data Protection Officer – The person(s) responsible for ensuring that it follows its data protection policy and complies with the Data Protection Act 2018.

Processing – means collecting, amending, handling, storing, destroying or disclosing personal information. This includes whether on paper, in a computer, or recorded on other material.

Personal Data – Information about living individuals that enables them to be identified – e.g. name and address, where they appear together. It does not apply to information about organisations, companies and agencies but applies to named persons, such as individual volunteers or employees within ACC or any individual for whom the ACC holds personal details.

Member – means an “Ordinary Member” of ACC, as defined by our Articles of Association.

This Notice has been developed in line with recommendations and templates provided by the [Information Commissioner's Office](#) (ICO).

Contact Details

ACC is a company limited by guarantee (No. SC342825) and a registered charity in Scotland (No. SC042865). ACC is a “Data Controller” responsible for your personal data, in line with legislation and is registered as a data processor with the ICO (registration number: 00013348017).

If you have any queries about this Notice or how we use your data, or to exercise any of your data rights, you can contact us by:

- Letter: Filling Station, Shore Street, Applecross, Strathcarron, IV54 8LR
- Email: ido@applecrosscommunitycompany.org
- Phone: 01520 930 072

What information we collect, use and why

During your interaction with ACC or ACT, eg. as a Member, client, customer, contractor, or user of our website, we may need to collect personal data about you.

a) During the provision of services and goods

- Contact details (eg name, address, telephone number or personal email address)
- Payment details (including card or bank information for transfers and direct debits)
- Financial information (eg credit checks required for agreeing tenancies and leases)
- Website user information (including user journeys and cookie tracking)
- Information relating to compliments or complaints

b) For service updates or marketing purposes

- Contact details (eg name, address, telephone number or personal email address)

c) For research purposes

- Contact details (eg name, address, telephone number or personal email address)
- Personal information used for the purposes of research
- Records of consent, where appropriate

d) In order to comply with legal requirements and prevent, detect or investigate or prosecute crimes

- Contact details (eg name, address, telephone number or personal email address)
- Identification documents
- Criminal offence data (eg. Disclosure Scotland checks)
- Safeguarding information

- “Know your customer” information disclosure requirements¹
- CCTV recordings of the Filling Station forecourt

e) In the process of procurement of contractors

- Contact details (eg name, address, telephone number or personal email address)
- Employment history (eg job application, employment references or secondary employment) and education history (eg qualifications)
- Details of any criminal convictions (eg Disclosure Scotland checks)

f) In the process of dealing with queries or complaints

- Contact details (eg name, address, telephone number or personal email address)

Our lawful bases for the processing of your data

Under UK Data Protection Law, we must have a “lawful basis” for collecting and using your personal information. There is a list of possible [lawful bases](#) in the UK GDPR and you can find out more about them on the ICO’s [website](#).

We will only use your personal data where it is permitted by the Data Protection Act 2018 and where:

- a) we need to use your personal data for procurement purposes (such as competitively tendering for contractors);
- b) we need to use your personal data to enter into a contract with you (such as being a subscriber to AppleNet broadband network);
- c) we need to use your personal data to comply with our legal or regulatory obligations (such as safeguarding or to prevent, detect, investigate or prosecute crimes);
- d) you have given us consent to use your personal data (such as becoming a Member of ACC, for service updates to the Filling Station and AppleNet Broadband, marketing or research purposes). If consent is needed we will ask for this from you separately; and
- e) it is in our legitimate business interests or the legitimate business interests of a third party we work with to use your personal data for specified purpose, and there is no disadvantage to you or risk to your personal data.

Where we get personal information from

We collect your information from the following places:

- Directly from you
- External Referees
- Disclosure Scotland (in relation to safeguarding checks, if required)

¹ [‘Know your customer’ guidance, accessible version - GOV.UK](#)

How long we keep information

The following table summarises the record retention periods required by legislation covering personal information ACC and ACT may collect about you.

#	Legislation	Examples of records	Retention period
1	Charities Act 2005 & Companies Act	Minutes of Director meetings and decisions made as resolutions in writing. Minutes of Annual General meetings and members resolutions passed other than at an Annual General Meeting	Minimum period is 10 years however the charity policy is to permanently retain these records
2	Charities Act 2005 and UK Data Protection Act 2018	Personal information about ACC members and volunteers	Only for period of individual's membership or involvement in activities
3	Charities Act 2005 & Companies Act	Organisational versions of ACC, ACT and group annual accounts and audits (separate to those available via Companies House)	Permanently
4	Charities Act 2005 & Companies Act	Purchase Invoices, Records of monies received and paid Grant, fundraising and gift aid records.	6 years after the end of the current period
5	HMRC	Employee details	6 years after the end of the current period
6	Taxes Management Act	Income Tax Records, P45 and P60	6 years after the end of the current period
7	Equality Act 2010 Limitations Act	Application forms and interview notes for unsuccessful candidates (recruitment of staff and contracting opportunities)	Six months to a year
8	Charities Act 2005 and UK Data Protection Act 2018	Records relating to child or adult safeguarding protection concerns	50 years
9	RIDDOR Regulations 2013	Accident books, records/reports	Legal requirement 3 years after last entry or end of investigation if later. Charity will retain for at least 6 years

For more information on how long we store your personal information or the criteria we use to determine this please contact us using the details provided above.

Who we share information with

In some circumstances, we may be required to share information with the following organisations:

- Organisations we are legally required to share information with and relevant regulatory authorities
- Disclosure Scotland (in relation to safeguarding checks)
- External auditors

ACC will not sell or rent your information to third parties, nor shall we share information with third parties for marketing purposes.

What are your privacy rights?

Data Protection Laws give you a number of rights as set out below.

- Access: you may request access to a copy of your personal information.
- Withdraw Consent: where our processing of your personal information is based on your consent, you can withdraw your consent at any time.
- Rectification: you may ask us to rectify any inaccurate information we hold about you.
- Erasure: you may ask us to delete the personal information we hold about you, where there is no reason for us to continue to hold your information.
- Portability: you may ask us to provide you with the personal information that we hold about you in a structured, commonly used, machine readable format, or you can ask us to send your information in this format to another controller.
- Object: you may object to our processing of your personal information.
- Restriction: you can ask us to restrict the personal information we use about you where you have asked for it to be erased or where you have objected to our use of it.

If you would like to exercise any of your rights, please contact us in writing.

How to complain

If you have any concerns about our use of your personal data, you can make a complaint to us using the contact details at the top of this privacy notice.

If you remain unhappy with how we've used your data after raising a complaint with us, you can also complain to the ICO. The ICO's address:

Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF

Helpline number: 0303 123 1113

Website: <https://www.ico.org.uk/make-a-complaint>

The Privacy Notice for Staff and Volunteers was approved by the Board of Directors of ACC on 5th February 2026 and will be reviewed either on 5th February 2027 or an

earlier date if a change to legislation or practice with respect to Data Protection is brought to the attention of the Board.

Document version control

Version number	Change or update	Author or owner	Date
1.0	First version	Roslyn Clarke	December 2020
2.0	Updated version	MM	5 th February 2026