



# Ayrshire Rural and Islands Ambition (ARIA) Fund

## Privacy Policy

### Introduction

The ARIA Fund is a rural development fund covering rural and islands Ayrshire. It replaces the previous EU LEADER Programme and is part of the wider Scottish Government Community Led Local Development (CLLD) programme. It is a Scottish Government fund. It is led by the ARIA Fund Local Action Group (LAG), comprising representatives from rural and islands Ayrshire, and administered by Accountable Body South Ayrshire Council (SAC).

### The ARIA Fund and Your Data

Protecting your personal information is extremely important to the ARIA Fund. We use information on you and your organisation, including names, addresses, contact details, bank details and account information for our applications and claims processes. Our applicants expect us to manage their information privately and securely and keep their information confidential, limited to the ARIA Fund staff team, partners supporting fund delivery, the ARIA Fund LAG, certain SAC staff, other CLLD-based LAGs in special circumstances (with co-operation (cross border) projects), and the Scottish Government's Rural Communities Team.

Please click for the [Rural Communities Team Privacy Policy](#).

The ARIA Privacy Policy tells you how we will do that in line with the General Data Protection Regulation (GDPR), transposed in the UK as the UK Data Protection Act 2018. Please take a few minutes to read it and show it to anyone else connected to the policy.

As mentioned, the Accountable Body for the ARIA Fund is SAC. This policy is aligned with:

- SAC's data protection policies and processes. Please click for [SAC's Privacy Policy/information](#).
- The annual CLLD Grant Award Agreement between SAC and the Scottish Government which requires that all duties of Data Protection Laws are adhered to in relation to the CLLD programme.
- Data protection policies and procedures of the Scottish Government and associated bodies such as the Scottish Rural Network.

### What is Personal Information?

When we talk about personal information we mean information about an individual that can identify them, such as their name, address, e-mail address, telephone number and financial details. Any reference to "information" or "data" in this policy is a reference to personal information about a living individual.

### What Information Do We Hold?

We may collect and process the following personal information about you:

Type of data	Description	Examples of how we use it
<b>Contact</b>	<ul style="list-style-type: none"> <li>Name</li> <li>Address (work/business/home)</li> <li>Contact details: telephone and email address</li> </ul>	<ul style="list-style-type: none"> <li>To promote future rounds of funding</li> <li>Contacting you regarding your project</li> <li>Processing your application</li> </ul>
<b>Organisation Information</b>	<ul style="list-style-type: none"> <li>Name and address of organisation</li> <li>Contact details of organisation: telephone and work email address</li> <li>Position within organisation</li> <li>Website URL</li> <li>Organisation type</li> <li>Organisation registration number (Charity/Company Number)</li> <li>VAT registration number</li> <li>Constitution/ Articles and Memorandum</li> <li>Incorporation document</li> </ul>	<ul style="list-style-type: none"> <li>To promote future rounds of funding</li> <li>Contacting you regarding your project</li> <li>Processing your application</li> </ul>
<b>Financial Information</b>	<ul style="list-style-type: none"> <li>Bank details (of main applicant: organisation or individual)</li> <li>Bank/credit card statements</li> <li>Organisation accounts</li> </ul>	<ul style="list-style-type: none"> <li>Processing your application</li> <li>Processing your claims</li> </ul>
<b>Project Related</b>	<ul style="list-style-type: none"> <li>Title deeds of property/land ownership</li> <li>Lease of land/property</li> <li>Relevant insurance documents</li> </ul>	<ul style="list-style-type: none"> <li>Processing your application</li> </ul>

### Where Do We Get our Information From?

Information you give us when:

- You contact us by phone or email – we will ask your permission if it is Ok to record your data.
- You complete the application process.
- You complete claims.

### How Do We Use Your Information?

We use personal information that we hold about you:

- To contact you at any time about your project idea/application/project.
- To promote new funding opportunities to you, including ARIA.
- To provide information to other CLLD grant-based areas who may potentially be involved (for example, if your project is a co-operation project).
- To process and assess your application.
- To assess and process your claims.
- To draw money down to SAC from the Scottish Government via the Rural Communities Team.

## Using Your Information in Accordance with Data Protection Laws

The ARIA Fund is complying with the requirements under the UK Data Protection Act 2018 in this policy and other documents and procedures through this policy. As discussed, this is a requirement under the UK Data Protection Act 2018 and the Scottish Government via our CLLG Grant Award Agreement. If you would like to find out more please contact us using the contact details at on **page 3**.

## How Long Do We Keep Your Information For?

Our CLLD grant award agreement with the Scottish Government states that all records (applications and support documents and claims and support documents) must be maintained by the ARIA Fund for six years post expenditure. The Scottish Government may request access to the records within this time.

## Who Do We Share Your Personal Information With?

### Enquiry Stage

When you make an enquiry, information will only be shared with partners appointed to support delivery of the fund (if appointed) and where required the ARIA Fund LAG. If your enquiry is thought to lead to a co-operation (cross border) project, we will potentially share your information with fellow CLLD-based fund staff teams.

### Application Stage

At application stage, we share your information with:

- Partners supporting the delivery of the fund (if appointed).
- The ARIA Fund LAG, who assess the applications.
- For co-operation projects, staff from other CLLD fund areas and their LAGs.

### Claims Stage

At claims stage, we share your information with:

- Partners supporting the delivery of the fund (if appointed).
- For co-operation projects, staff from other CLLD fund areas.

### Drawdown Stage (reclaiming monies allocated by SAC from SG)

- The Scottish Government's Rural Communities Team

### Audit

- The Scottish Government.

## Your Rights

You have rights under data protection law including GDPR that relate to the way we process your personal data. Your rights in relation to the ARIA Fund can be found on **pages 4 and 5**. More information on these rights can be found on the Information Commissioner's website at <https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/>

## Contacts Details

If you have any questions about this privacy policy or wish to exercise any of your rights, please contact us directly at [aria@south-ayrshire.gov.uk](mailto:aria@south-ayrshire.gov.uk) or 01292 616 444.

## Your Rights

Some of the rights under GDPR apply to the ARIA Fund and some do not (those which do not are presented in italics below):

### **The right to be informed**

We will provide you with our Privacy Policy as soon as you provide us with personal data.

### **The right of access**

You can request access to the personal data we hold on you via a Subject Access Request (SAR).

### **The right to rectification**

If the information we hold on you is incorrect, you have the right to request it is rectified.

### **The right to erasure or to be forgotten**

This can be exercised at any time enquiry or application stage, *but if your application is approved and proceeds to grant payment we have a duty enforced upon us by the Scottish Government to maintain your information for six years post final payment. Please see section 'How Long Do We Keep Your Information For?'*

*The right to erasure is more applicable to private activities, for example where marketing is involved, to give people the right to stay out of the public eye.*

### **The right to restrict processing**

The ARIA Fund process assumes you are happy to proceed with your application and it is you who supplies us with information. If you do not wish to proceed through the enquiry/application process please contact us and the process will be ceased. *If your project is approved and your ARIA fund grant award agreement is in place, you would have to adhere to the conditions of this agreement.*

### **The right to data portability**

This right involves information we hold being transferred to another body. This can be exercised prior to your ARIA fund grant award agreement being put in place, *when you would have to adhere to the conditions of this agreement.*

### **The right to object**

This usually applies to marketing activities and would not be applicable to an application process where consent is assumed by the enquirer/applicant providing information of their own accord. You do however have the right to object to us holding any of your information, but it may not be possible to uphold the request depending upon the stage at which it is made.

### ***Rights in relation to automated decision making and profiling***

*This relates to use of information for consumer marketing profiling and does not apply to the ARIA Fund.*

### **How to Exercise Your Rights**

You can exercise the above rights which apply to the ARIA Fund either by contacting us directly, by email at [aria@south-ayrshire.gov.uk](mailto:aria@south-ayrshire.gov.uk) or on 01292 616 444.

We must respond without due delay, no later than one month from the request. Enquiries received verbally will be logged in our internal system.

## **Data Breaches**

Data Breaches include, for example, paper files being lost or mislaid, or electronic files being left on a computer for other members of the public to see. We must report data breaches to the Information Commissioning Officer within 72 hours. We will inform individuals affected where there is a high risk to those individuals, in line with the regulations.