



Privacy Policy

This policy outlines how Policy Scotland uses your personal information, what we do to ensure the safety and security of it, and who we share your information with. We will also inform you of your rights and how the law protects you.

Who are we?

We are Policy Scotland, with our default web address being www.policyscotland.org.uk

In this privacy policy:

- “we/us” means Policy Scotland
- “Third party” means someone who is not you or us

Policy Scotland is registered through HMRC (we can provide our UTR details if required) whose trading office is 64a Cumberland Street, Edinburgh, EH3 6RE. If you have any comments or concerns, you can contact us here:

- jules@policyscotland.org.uk
- (+44) 07808 888 096

Our Privacy Principles and Promise

Policy Scotland is committed to respecting your privacy. Below are our core Privacy Commitments. We aim to put these commitments at the heart of everything we do. We will:

- Keep your data safe and private
- Not sell your data
- Never share your details without checking with you beforehand, unless you have specifically asked us to do so

If you have contracted us to share your data, or similar

As well as our Privacy Promise, your privacy is protected by law and this section explains how that works. Data Protection regulations state that we can use personal information only if we have a proper reason to do so, this includes sharing it outside Policy Scotland. We would only share your data:

- To fulfil a contract, we have with you; or
- When it is our legal duty; or
- When you consent to it; or
- If you have requested for us to do so on your behalf

Your Rights

At any point while we are in possession of or processing your personal data, you as the data subject have the following rights:

- **Right To Access**
You have the right to request a copy of the information that we hold about you.
- **Right To Rectification**
You have a right to correct data that we hold about you that is inaccurate or incomplete.
- **Right Of Portability**
Often when people leave an organisation and onto another, they pass Policy Scotland their new details. You have the right to have the data we hold about you transferred to another organisation or wiped.
- **Right To Object**
Policy Scotland does not send any mass marketing. Were this to ever change, we would check with you in advance before you are being added to any mailout list(s). You have the right to object to certain types of processing such as direct marketing at any time and can assume we shall not direct mail you unless agreed in advance.

We may Use Your personal information to

- Manage our relationship with you or your business
- Develop new ways to meet our customers' needs and to grow our business
- Study how our clients use products and services from us and other organisations
- Provide advice or guidance about our products and services

Where we collect personal information from

We may collect personal information about you (or your business) from these sources:

- Data you give to us
- When you approach us for our products and services
- When you contact us for a different matter

Third Parties

We also obtain data from publicly available sources such as information held in Companies House, and information about you that is openly available on the internet. However, we would never purchase or sell contact information.

Training

All staff have undergone GDPR training which will be ongoing to ensure they are aware of relevant information, legislation and controls.

GDPR Review

We have reviewed our process and appropriate changes have and will be made to provide appropriate data management. We will continually review our procedures for IT and data management to keep up to date with changing technology and systems.

- Data we collect when you use our services.
- Companies that introduce you to us
- Social networks

Who would we share your information with?

We may share your personal information these organisations:

- Organisations that introduce you to us
- Companies we have a joint venture or agreement to co-operate with
- Companies that we introduce you to
- Network, or other service providers who provide the services for your contract
- HM Revenue & Customs, regulators, and other authorities
- Companies you ask us to share your data with
- Law enforcement agencies, regulatory organisations, courts, or other public authorities if we must, or are authorised to do so. In the event we sell or buy any business or assets, in which case we may disclose your personal data to the prospective seller or buyer of such business or assets as part of the process of evaluation and to ensure continuity of service

Cookies

Our website does not use cookies to distinguish you from other users of our website.

The Physical Measures We Take to Protect Your Data

- Restriction of access to our building, as necessary
- Adequate locks on all exterior doors.
- Monitoring of unauthorised access.

The Technical Measures We Take to Protect Your Data

- Restricting access to systems depending on the sensitivity/criticality of such systems
- Fingerprint and password protection for all systems
- Security over wireless networks and remote access tools, always using own data as the default setting
- Added security on mobile devices

- Automatic device locking

Marketing

We do not currently choose to market our services or publications. Were this to ever change, we would contact you in advance to gain your permission, or for you to opt out of this as an option.

How Long We Keep Your Personal Information

Policy Scotland reviews all contacts every 3 years as standard, with a continuous ongoing update as changes take place or are requested.

How To Get A Copy Of Your Personal Information [Referred To As Subject Access Request]?

You can request access to the personal information we hold on you, by writing to us at this address: Policy Scotland, 64a Cumberland Street, Edinburgh, EH3 6RE. You can also email us at jules@policyscotland.org.uk. To ensure we are only sending the information to someone authorised to have it, we may (at our discretion) require you to provide ID from the below list:

- Passport
- Driving licence
- Birth certificate
- Utility bill (from last 3 months)
- Bank statement (from last 3 months)

Letting Us Know If Your Personal Information Is Incorrect

You have the right to question any information we have about you that you think is wrong or incomplete. Please contact us if you want to do this. If you do, we will take reasonable steps to check its accuracy and correct it. Our main aim is to maintain records that reflect you, and what you wish us to hold.

What If You Want Us to Stop Using Your Personal Information?

You have the right to object to our use of your personal information, or to ask us to delete, remove, or stop using your personal information if there is no need for us to keep it. This is known as the 'right to object' and 'right to erasure', or the 'right to be forgotten'. There may be legal or other official reasons why we need to keep or use your data. But please tell us if you think that we should not be using it, or you'd like us to remove your information from our records.

You Can Ask Us to Restrict the Use of Your Personal Information If:

- It is not accurate
- It has been used unlawfully but you don't want us to delete it
- It is not relevant anymore, but you want us to keep it for use in legal claims
- You have already asked us to stop using your data, but you are waiting for us to tell you if we are allowed to keep on using it
- If you want to object to how we use your data, or ask us to delete it or restrict how we use it or, please contact us.

How To Withdraw Your Consent for Non-Statutory Personal Information

You can withdraw your consent at any time. Please contact us if you want to do so and we shall rectify this swiftly.

Reporting Breaches

As soon as Policy Scotland become aware of any breach, we have a legal obligation to report the data breach to the ICO within 72 hours. Where feasible and if a high-risk breach, we will inform the individual effected and give the action plan we are putting in place to rectify such. All our Employees have an obligation to report actual or potential data protection compliance failures. This allows us to:

- Investigate the failure and take remedial steps if necessary
- Maintain a register of compliance failures
- Notify the ICO of any compliance failures that are material either individually or as part of a pattern of failures

Any employee who fails to notify of a breach or is found to have known or suspected a breach has occurred but has not followed the correct reporting procedures will be liable to disciplinary action.

How To Complain

Please let us know if you are unhappy with how we have used your personal information. You can contact us in writing or by email. You also have the right to complain to the Information Commissioner's Office if we do not respond to your complaint appropriately and in a timely manner. www.ico.org.uk

Our address: Policy Scotland, 64a Cumberland Street, Edinburgh, EH3 6RE

Email address for all GDPR matters: jules@policyscotland.org.uk