

# Website Privacy Notice

Citizens Advice Scotland



## Introduction

Citizens Advice Scotland (also referred to 'CAS', 'the charity', 'we', 'our', or 'us') is the Data Controller over any personal data we process about you for the purposes set out in this Privacy Notice (see below). The Citizens Advice network in Scotland is the largest independent advice service in the country. Citizens Advice Scotland is a charity within this network, alongside 59 individual Citizens Advice Bureau ('CAB' or 'CABs') across Scotland and Great Britain, which all operate as independent charities in their own right.

Citizens Advice Scotland is responsible for keeping your personal data safe and making sure, we use it in accordance with data protection law. We are registered as a data controller with the Information Commissioner's Office and our registration number is Z9715836.

## Scope of this Privacy Notice

This notice outlines what personal data the charity collects and processes about you when you become a client of CAS, or when you contact us to make an enquiry via our website or over the phone or email or via web chat.

This is the CAS General Privacy Notice and it is important that you read this notice. However, it is important that you also read the other privacy notices specific to the services you receive from the charity such as the), Help to Claim, Citizens Advice England and Wales (CitA), Patient Advisory and Support Service (PASS), Money Talk Team and Armed Services Advice Project (ASAP).

## If you've used the Extra Help Unit (EHU)

The Extra Help Unit is managed by Citizens Advice Scotland and it processes your personal data to support you in resolving any problems or complaints with your energy supplier. If you have accessed the services of the EHU you should also refer to the [EHU Privacy Notice on the website](#).

## If you've used a CAB

This Privacy Notice only tells you how CAS uses your personal data when you visit [www.cas.org.uk](http://www.cas.org.uk) or use CAS central services. Where you have sought advice from a Citizens Advice Bureau or have accessed services from Citizens Advice Bureau you should also refer

to that CAB's own Privacy Notice on their website or contact them directly to request a copy. See here [to find a Bureaux](#).

Each CAB is a data controller. CAS works alongside the CAB and may have joint access and control over your personal data where we are working together to support you. If you have any questions relating to how the CAB processes your personal data or wish to exercise any of your data protection rights (e.g. Right of Access) please contact the Bureau directly who will provide you with support.

Citizens Advice Bureaux use a case management system called CASTLE. CAS are Joint Controllers with each Bureaux for the data held on this system.

### **Our Purpose for Using Your Personal Data**

Citizens Advice Scotland collects and uses your personal data to help solve your problems, improve our services and tackle wider issues in society that affect citizens in Scotland. We only use the personal data we need. We always let you decide what you're comfortable telling us, explain why we need it, and will always treat it as confidential.

When we record and use your personal data we:

- > only access it when we have a good reason
- > only share what is necessary and relevant
- > don't sell it to anyone

### **Our Commitment**

CAS is committed to processing your personal data in accordance with the requirements of the UK GDPR and the Data Protection Act 2018 ('Data Protection Law'). This means that we:

- > process it fairly, lawfully and in a clear, transparent way;
- > only use it in the way that we have told you about;
- > ensure it is correct and up to date;
- > keep your data for only as long as we need it;
- > process it in a way that ensures it will not be used for any purpose you are not aware of;
- > process it in a way that ensures it will not be lost or accidentally destroyed;

### **What is personal data?**

**Personal Data:** is any information that could be used to directly, or indirectly identify a living person ('data subject') such as a name, an identification number, location data, an

online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

**Special Category Data:** means personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, and the processing of genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning a natural person's sex life or sexual orientation.

When we use the term 'personal data', we mean both personal data and special category of data.

### How we collect Personal Data

We will collect data directly from you when you contact us to seek support or make an enquiry.

We also obtain personal data from third parties, other Citizen's Advice Bureaux's, and via our CAS service teams Extra Help Unit (EHU) or Help to Claim, our Patient Advisory and Support Service (PASS), the Money Talk Team, and Armed Services Advice Project (ASAP), Citizens Advice England and Wales, public authorities and referral sources.

We may also obtain your personal data if you kindly make a donation to us using one of our third-party fundraising platforms providers (such as Just Giving).

Our website is not intended for children and we do not knowingly collect data relating to children from our website. However, we may collect information relating to children from you when we ask about dependents during the course of delivering some support services. Please see the below table for further details.

Our website contains links to the sites of third parties (e.g. other bureaux). When you visit these sites, we suggest that you read their privacy policies. CAS is not responsible for the privacy policies or the content of such sites.

We may utilise social media platforms to undertake targeted advertising e.g. Facebook or X/Twitter. We do not process your personal data to do so however should you interact with the advertisement to make contact with CAS we will process your data based on one or more of the purposes listed below.

## Our Processing

**Personal Data** is collected in several different ways depending on your interaction with us. The table below sets out what personal data we process about you, where we get it from, why we use it, our legal basis and whom we share it with.

Purpose	Personal Data	Where do we get it from?	Legal Basis	Will we share it other than as set out above?
To respond to enquiries (online and otherwise) and to provide or facilitate you with our service, advice and/or support.	Name, email address, any information you provide to us.	When you submit an enquiry on our website, use our online forms, Chatbot (virtual assistant), email, text, telephone, post or when we meet you face to face.	Legitimate Interest – it is in our legitimate interest to respond to enquiries, requests and information received to ensure we provide you with the relevant support.	We may share this data with CABs for the purpose of providing you with the service, correct advice and/or support.
To provide you with CAS advice session communications by email or text.	Name, email and telephone number	From you	Legitimate Interest	No.
Images of you may be taken by CCTV systems when you have attended some of our premises, such as at door entry points, which are used by members of the public.	Camera footage	Through our CCTV devices on site	Legitimate Interest – it is in our legitimate interest to capture CCTV footage at our premises for security purposes	Only where required for the purposes of detecting or preventing crime.

Images and recordings of you may be taken via video or photography if you attend our premises or attend CAS hosted events or training.	Photographs or videos	If you attend CAS office premises or attend CAS hosted events or training, both in person or online.	Legitimate interests – it is in our legitimate interests to capture media for promotional or training purposes.	These images may be used in promotional materials or shared with CABs.  We will advise when photography or recording is taking place and provide you the opportunity to restrict processing of your personal data for these purposes.
To market our services, ideals or aims with a view to converting inquiries, send you our newsletters and similar updates, and marketing activity in relation to donations for our charity.	Name, email address, telephone, address.	From you	Our legal basis is that it is in our legitimate interest to market our services, ideals or aims.  We may also rely on consent for certain marketing activity and where this is the case, we will obtain this from you separately.	We may share and receive information from third parties such as Just Giving, where you provide your marketing preferences through their platform.
To take part in the CivTech challenges and/or improve or provide additional service benefits or solutions through technology developed via the <a href="#">CivTech challenge</a> .	Name, email address, information you provide to us through using our services, including data held within CAS's case management system.	From you or from organisations that take part in the CivTech challenge or from Citizen's Advice Bureaus.	Our legitimate interests of improving our service and keeping it up to date with current technology in order to provide offer high quality advice and access to our help.	We may share this data with organisations that take part in the CivTech challenge and/or Citizen's Advice Bureaus for the purpose of improving our service and keeping it up to date with current technology in order to provide offer high quality advice and access to our help

				and for the purpose of taking part in the CivTech challenge
To set cookies on our website.	Data about your use of our website.	From you	For essential cookies, it is in our legitimate interest to use these to operate the website.  For non-essential cookies, we rely on your consent.	Google Analytics.
To provide IT support	Data on our case management system.	From you and other bureau's	Our legal basis is that it is in our legitimate interest to manage our systems.	No.
To record and monitor calls	Call recordings	From you.	Our legal basis is that it is in our legitimate interest to ensure our calls are of good quality and public task to record calls where we are required to record calls relating to specific services, such as our Help to Claim service.	We may share this data in limited circumstance where we need to defend a complaint and legal claim and in respect to the Help to Claim service we may be required to share the information with partners we work with including Citizen's Advice Bureaus, Citizens Advice England and Wales and the Department for Work and Pensions.

Consent and responses for Customer Satisfaction Survey or any other surveys.	Name, email address, telephone, address.	From you.	Your consent.	No.
To meet Scottish National Standard of Service	Name, email address, telephone, address.	From you.	Our legal basis is that it is a legitimate interest to ensure that we are meeting the required standards of advice delivery	The Scottish Legal Aid board will be extended access to our systems to peer review client files to ensure that we are meeting the standards we are required to maintain.
We may use your personal data for monitoring purposes, our research, advocacy work, and campaigning work and to keep improving our service for citizens in Scotland.	Information you supply to use through survey responses or information supplied by bureaux's	Directly from you and from your CAB	Legitimate interest - Each CAB is an independent charity and, along with CAS, is a member of the Scottish Association of Citizens Advice Bureaux (SACAB) and we have a legitimate interest to process this data to further our organisational aims and improve our service, to provide service infrastructure services or case study data for research purposes or assess the impact of our services or for advocacy purposes.	We may use your personal data for monitoring purposes, our research, advocacy work, and campaigning work and to keep improving our service for citizens in Scotland.

<p>We may use your personal data where it is collected when you engage with national projects such as to the extent to which we are involved in the delivery of the projects and for reporting purposes.</p>	<p>Information you provide when you engage with the national projects.</p>	<p>Directly from you and from your CAB</p>	<p>We generally rely on legitimate interests but may rely on another lawful bases as dictated by the specific national project.</p>	<p>We may share this information with government agencies and other trusted partners. We take steps to remove any data to identify you before we share it.</p>
<p>To understand who is fundraising on our behalf, if you create a fundraising page for us.</p>	<p>Name, email address</p>	<p>Directly from you, via our third-party fundraising platforms (such as Just Giving).</p>	<p>We have a legitimate interest to understand who has launched a fundraising campaign on our behalf.</p>	<p>Information will be shared between CAS and your chosen fundraising platform.</p>



Where we process **special category personal data** such as health data, and **information relation to criminal convictions**, some of the lawful bases we rely upon for processing, in addition to those set out above, include:

1. where it is necessary for the purposes of the provision of health or social care or treatment or the management of health or social care systems and services and for 'the provision of social care' and 'the management of social care systems or services' under Paragraph 1, Part 1, Schedule 1, Data Protection Act ('DPA') 2018;
2. where it is necessary for the applicable substantial public interests conditions set out in Part 2, Schedule 1 DPA;
3. where it is necessary to protect you or another person from harm;
4. in limited circumstances, with your explicit written consent;
5. less commonly, we may process this type of information where it is needed in relation to legal claims.

Please see our Appropriate Policy Document for more information.

### **Will we share your Personal Data outside of the UK?**

We rarely transfer personal information outside the UK when delivering our services but some of our service providers that process personal data may be located outside UK. Where any parties we need to share personal data with are located in a recipient country, not deemed adequate by the UK Government, we will always put in place appropriate safeguards to protect your personal data and any necessary supplementary measures as required under Data Protection Law.

### **Who we share your information with**

We will treat all personal data confidentiality and will only share it where we have a legal basis for doing so. If we share personal data with third party service providers we enter into contracts to ensure they process your personal data in line with our instructions. We will only share your personal data:

- > where we are required to share your personal data in accordance with law e.g. such as to assist with investigations carried out by the police, other authorities or any regulatory requirement to which the charity is subject;
- > with third party service providers including IT, telephone and marketing specialists and companies which provide website analytics.

- > with trusted members of the Citizens Advice network in Scotland and trusted partners including the CivTech challenge organisation and our corporate partners and other agencies with whom we collaborate, such as the DWP;
- > With donation suppliers, fundraising management sites and social media platform providers, where we have your agreement;
- > our professional advisors such as auditors, insurers and legal advisors;
- > where you contact us with a general query which relates to a specific Citizens Advice Bureau, we will pass your details on to them so that they can respond directly; and we will share anonymised data if it used as statistical data in any national research reports, or if we use it to create case studies.

### **How we protect your personal data**

Where CAS retains your personal information in one of our own data centres, all data will be stored on UK based servers. Where CAS utilises cloud-based storage, your data may be stored in a data centre in an additional country within the European Economic Area for resilience. Core systems are only accessible by CAS staff and a small number of contract for service practitioners.

Security measures in place within CAS's data centres include:

Physical security measures; Strong passwords; Password lock out policy; Managed permissions; Two factor authentication; Encryption; Antivirus software; Anti-malware software; Data loss prevention software; Secure Email Gateway; Software patch management; Appropriate data backup arrangements.

Your personal information may also be stored on third party, cloud based solutions. Where this is the case, CAS will ensure that that third party complies with the UK GDPR when processing your data.

Please be aware that data transmission over the internet is inherently insecure, and we cannot guarantee the security of data sent over the internet.

### **How long we keep your personal data**

In line with data protection principles, we will not keep your personal data for any longer than is reasonably necessary. We have a record retention schedule that sets out the periods for retaining and reviewing all information that we hold and is updated regularly. All data will be securely destroyed or disposed of once it is no longer needed.

## Your rights

You have certain rights under data protection law, which are summarised below. You can exercise these by contacting our DPO [dpo@cas.org.uk](mailto:dpo@cas.org.uk)

- you can withdraw your consent (including for marketing) at any time, at which point we shall stop processing your personal data in that way. Please note this does not affect the legality of our processing up to the date of your withdrawal of consent.
- you can seek to restrict our processing of your personal data, ask us to rectify any personal data we hold about you and to ask us to complete information you think is incomplete, and to object to us processing your personal data for the purposes stated above.
- you have the right to request access to a copy of the personal data held by us about you.
- in certain circumstances you have the right to ask us to provide you with your personal data in a structured, commonly used and machine-readable format to allow you (or us on your behalf) to transmit this information to another party.
- in certain circumstances you have the right to ask us to erase the personal data we hold about you. We will consider any such request in line with UK GDPR. Please note this is not an absolute right and there may be circumstances where we choose not to delete all of the personal data we hold about you.

You have the right to lodge a complaint with the Information Commissioners Office (ICO) if you think that we have infringed your rights. You can find more information about reporting a matter to the ICO at the following link: <https://ico.org.uk/>

## Contact

Questions, comments and requests regarding this privacy notice are welcomed and should be emailed to [dpo@cas.org.uk](mailto:dpo@cas.org.uk), or sent in writing to:

Citizens Advice Scotland  
Broadside  
Spectrum House  
2 Powderhall Road  
Edinburgh EH7 4GB

## Changes

We reserve the right to amend this privacy notice from time to time.

Last Updated: December 2024