Privacy Notice
Citizens Advice Scotland

Citizens Advice Scotland (CAS) is aware of its obligations under the General Data Protection Regulation (GDPR) and is committed to processing your data securely and transparently. This privacy notice sets out, in line with GDPR, how we collect and use your personal data during and after you contact us or access our services.

It is important that you read this notice, together with any other privacy notice we may provide on specific occasions when we are collecting or processing personal information about you, so that you are aware of how and why we are using your data.

As part of the Citizens Advice network in Scotland, we collect and use your personal information to help solve your problems, improve our services and tackle wider issues in society that affect citizens in Scotland.

We only ask for the information 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 information we:

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

Data Controller Details

Citizens Advice Scotland and the local Citizens Advice Bureau whose services you may access are both responsible for keeping your personal information safe and making sure we comply with data protection law. This means we are joint data controllers.

Each local Citizens Advice Bureau is an independent charity and, along with CAS, is a member of the Scottish Association of Citizens Advice Bureaux (SACAB). This means we use your information for monitoring purposes, our research and campaigning work and to keep improving our service for citizens in Scotland.

We are registered as a data controller with the Information Commissioner's Office and our registration number is Z9715836.
If you’ve used a local Citizens Advice Bureau

This Privacy Policy will tell you most of what you need to know about what happens to your personal information when you visit our website (ww.cas.org.uk) or otherwise come into contact with CAS’s services.

If you have accessed services from a local Citizens Advice Bureau, you should also read their own Privacy Policy as it will contain additional information around how your data is stored or shared by that bureau. Please contact the relevant bureau directly and ask to see their Privacy Policy, or visit their website. You can find contact details for all Scottish bureaux here.

Data Protection Principles

In relation to your personal data, we will:

> process it fairly, lawfully and in a clear, transparent way
> collect your data only for reasons that we find proper for the course of your employment in ways that have been explained to you
> 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 anything that you are not aware of or have not consented to (as appropriate)
> process it in a way that ensures it will not be lost or accidentally destroyed

Types of Data We Hold and Collect

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

CAS may collect and process the following personal data about you:

> Information that you provide by filling in forms on this website or provide to CAS directly, including your name, address, email address, phone numbers, date of birth, gender, age, and financial and credit card information
> Correspondence with you (either via email, record of call, voicemail message or otherwise)
> Details of your visits to our websites including, but not limited to, traffic data, location data, weblogs, other communication data and the resources that you access (see the Cookies section below for more information on this)
> Images of you may be taken by CCTV systems when you have attended some of our premises used by members of the public. These images are for the purposes of public and staff safety and crime prevention and detection. CCTV is also installed on the outside of some of our buildings for the purposes of monitoring...
building security and crime prevention and detection. Images saved by CCTV will not be stored in our systems longer than necessary

> Any information that you choose to send us via email or social networking tools such as Twitter, Facebook and Instagram

**Cookies**

When you visit our website, we collect ‘cookies’ to help us understand more about how our site is used by visitors, and to develop and enhance our services to you. A 'cookie' is a bit of information kept on your computer. It tells us things like what device you're using and what pages you click on.

We use cookies to:

> track aspects of user visits, including the length of a user’s visit, their browser, geographic location and the use of the search facility on this website
> remember users selected contrast and/or text resizing style preferences for this website
> record a user's video preferences for our videos viewed on this website

**How we use your information**

When we are providing a service to you, we may use information held about you in the following ways:

> To contact you to provide you with information, products or services that you request from us
> To administer our website
> To ensure that content from our website is presented in the most effective manner for you and for your computer
> To notify you about changes to our products or services where we have consent to communicate with you via marketing
> To process any accessibility information provided if relevant in order to ensure adequate facilities are provided for individuals
> To process email addresses or other contact details to provide marketing or communications, request customer feedback only where individuals provide consent for us to carry out this type of activity

**Our legal basis for processing your personal data**

We will only process your personal information where we have a legal basis to do so, this may include the following reasons:

> in order to perform the contractual terms of your engagement with us, for example the contract governing your employment, service provision, or voluntary service provision
> to comply with the law, called 'legal obligation' - for example, if a court orders us to share information
> to defend our legal rights - for example, to resolve a complaint that we gave the wrong advice
> in order for us to carry out our legitimate interests – for example, we would use anonymous data to create case studies and statistics for our national research
> where we need to carry out a task in the in the public interest or as part of our official functions, and the task has a clear basis in law, called a ‘public task’
> where we need to protect your vital interests (or someone else’s interests) in a life threatening emergency

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.

We may share your information with third parties where it is necessary to perform a contractual service or administer our relationship with you, where we are required by law to do so, where we have a legitimate interest in doing so, or when we are required by public interest requirements to do so.

Where you contact us with a query which relates to a specific Citizens Advice Bureau we will pass your details on to them so that they can respond directly.

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.

CAS engages third-party suppliers to provide services including IT, confidential waste shredding, training, occupational health services or specific pieces of work, among others. These suppliers may process personal information on our behalf as “processors” and are subject to written contractual conditions to only process that personal information under our instructions and protect it.

We may share personal information with our professional and legal advisors for the purposes of taking advice.

We may also share your information with third parties from time to time if that sharing is required in relation to the service we are providing to you, including, but not limited to:

> Third party software, analytics, website and search engine suppliers or IT suppliers including Google Analytics, Drupal, and MailChimp
> Any relevant members of the Citizens Advice network in Scotland, including local Citizens Advice Bureau
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 additional European Union country data centres for resilience, which are also governed by the GDPR. 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 GDPR when processing your data.

We will not transfer personal information out with the EU.

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

Citizens Advice Scotland respects the rights of data subjects in regards to the access and control of their personal data.

Your rights in relation to your personal data are:

- The right to be informed. This means that we must tell you how we use your data, and this is the purpose of this privacy notice
- The right of access. You have a right to request access to the personal information that we hold about you by making a subject access request
- The right for any inaccuracies to be corrected. If any data that we hold about you is incomplete or inaccurate, you are able to require us to correct it
> The right to have information deleted. If you would like us to stop processing your data, you have the right to ask us to delete it from our systems where you believe there is no reason for us to continue processing it.

> The right to restrict the processing of the data. For example, if you believe the data we hold is incorrect, we will stop processing the data (whilst still holding it) until we have ensured that the data is correct.

> The right to portability. You may transfer the data that we hold on you for your own purposes.

> The right to object to the inclusion of any information. You have the right to object to the way we use your data where we are using it for our legitimate interests.

Where you have provided consent to our use of your data, you also have the unrestricted right to withdraw that consent at any time.

You also have the right to complain. If you think that Citizens Advice Scotland is handling your personal data inappropriately or is not meeting its legal requirements in respect of data protection laws, you have the right to complain to the Information Commissioner’s Office. Please visit the Information Commissioner’s website for more information (https://ico.org.uk/).

Contact

Questions, comments and requests regarding this privacy policy are welcomed and should be emailed to dpo@cas.org.uk, or sent in writing to:

Data Protection Officer
Citizens Advice Scotland
Spectrum House
Powderhall Road
Edinburgh
EH7 4GB