

Advice Direct Scotland

Privacy Notice for Customers

Introduction

Advice Direct Scotland (ICO Registration Z9035412) (“ADS”) takes your privacy very seriously. This Privacy Notice is intended to set out your rights and answer any queries you may have about your personal data.

If you contact us through Citizens Advice Direct (“CAD”), the Glasgow Advice and Information Network (“GAIN”) and services provided through <https://www.advice.scot> (including live chat and email) and our Facebook accounts (<https://www.facebook.com/advice.scot/> and <https://www.facebook.com/CADirect/>), the controller of your data will be ADS. If you contact us through the Armed Services Advice Project (“ASAP”) or the Kinship Care Helpline (“Kinship”), the controller of your data will be the Scottish Association of Citizens Advice Bureau (“CAS”), where ADS act as data processor. More information about CAS is available through their website, www.cas.org.uk.

Our personal information handling policies and procedures have been developed in line with the requirements of the 1995 European Union Data Protection Directive (Directive 95/46/EC), the General Data Protection Regulation (in force from 25 May 2018) and applicable national law.

What information do we collect?

We collect and process personal data about you when you interact with our advisers or automated services. The personal data we process includes:

- Your name;
- Your phone number;
- Your email address;
- Your home address;
- Information related to the browser or device you use to access our website;
- Recordings of calls you make to our ASAP and Kinship teams;
- And/or any other information you provide.

How do we use this information and what is the legal basis for this use?

We process the data listed above for the following purposes:

- In accordance with our legitimate interests, to assist you in your enquiry and to provide relevant and applicable guidance, advice and information and to discern your eligibility for specialist projects. Where this information is not provided, the service we are able to give you will be limited or we may be unable to proceed;

- In accordance with our legitimate interests, to forward you relevant information or advice via email or text, following the resolution of your query;
- To comply with applicable law and legislation;
- In accordance with our legitimate interests in protecting ADS's legitimate business interests and legal rights, including but not limited to, use in connection with legal claims, compliance, regulatory and investigative purposes (including disclosure of such information in connection with legal process or litigation);
- To monitor use of our websites and online services. We may use your information to help us check, improve and protect our products, content, services and websites, both online and offline, in accordance with our legitimate interests;
- We may monitor any customer account to prevent, investigate and/or report fraud, terrorism, misrepresentation, security incidents or crime, in accordance with applicable law and our legitimate interests;
- In circumstances where you contact us by telephone, calls on our ASAP and Kinship lines may be recorded for quality, training and security purposes, in accordance with our legitimate interests; and
- In accordance with our legitimate interests, to provide our funders with anonymous statistics on service use. These reports will never include any personally identifiable information, meaning no-one will be able to discern who you are from the information provided.

With whom and where will we share your personal data?

- Personal data may be shared with government authorities and/or law enforcement officials if required for the purposes above, if mandated by law or if needed for the legal protection of our legitimate interests in compliance with applicable laws.

How long do we keep your personal data?

We will not keep your personal information for any purpose for longer than is necessary and will only retain the personal information that is necessary in relation to the purpose. We are also required to retain certain information as required by law or for as long as is reasonably necessary to meet regulatory requirements, resolve disputes, prevent fraud and abuse, or enforce our terms and conditions.

If you contact us through any of our services, not including ASAP or Kinship, we will keep your information for as long as is necessary to resolve your query and for one month after the query is closed.

If you contact us through ASAP or Kinship, CAS will retain your information in accordance with their own Privacy Notice. Please contact CAS for further information.

We will retain your data for a short time beyond the specified retention period, to allow for information to be reviewed and any deletion to take place. In some instances, laws may require ADS to hold certain information for specific periods other than those listed above.

Where is your data stored?

All data for which we act as Data Controller is stored within the European Economic Area (“EEA”).

What are your rights in relation to your personal data?

If the information we hold about you is inaccurate or incomplete, you can notify us and ask us to correct or supplement it.

You also have the right, with some exceptions and qualifications, to ask us to provide a copy of any personal data we hold about you.

Where you have provided your data to us and it is processed by automated means, you may be able to request that we provide it to you in a structured, machine readable format.

If you have a complaint about how we have handled your personal data, you may be able to ask us to restrict how we use your personal data while your complaint is resolved. In some circumstances you can ask us to erase your personal data (a) by withdrawing your consent for us to use it; (b) if it is no longer necessary for us to use your personal data; (c) if you object to the use of your personal data and we don't have a good reason to continue to use it; or (d) if we haven't handled your personal data in accordance with our obligations.

Where can you find more information about ADS's handling of your data?

If you have any queries regarding this Privacy Notice, about ADS's processing of your personal data or wish to exercise your rights you can contact ADS's proscribed Data Protection Officer, Andrew Bartlett, using this email address: andrew.bartlett@advice.scot.

If you are not happy with our response or require further information regarding data processing rules and regulations, you can contact the Information Commissioner's Office: <https://ico.org.uk/>.