

# Privacy and Cookie Policy

## INTRODUCTION

**Scottish Refugee Council** is committed to protecting your privacy and being transparent about the collection and the use of your personal data.

The purpose of this Notice is to explain how Scottish Refugee Council processes your data, whether you are using our services, you are interested in working or volunteering with us, making a donation, involved in our New Scots Connect initiative, or just browsing our website.

We may update this Notice from time to time to reflect changes in our practices or in the law but if we do so, we will provide you with access to an updated copy of this Notice as soon as reasonably practical. This Notice was last updated on 15 October 2019.

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### 1. HOW TO CONTACT US

If you have any queries about Scottish Refugee Council's Privacy Notice or the way we process your personal information, please contact: The Data Protection Officer, Scottish Refugee Council, Portland House, 17 Renfield Road, G2 5AH or email [data@scottishrefugeecouncil.org.uk](mailto:data@scottishrefugeecouncil.org.uk)

Please contact us as soon as possible after there is any change to your personal details, including your contact details.

### 2. GENERAL INFORMATION

#### Retention periods

Generally, we will not hold your personal data for any longer than is necessary for the uses outlined in this Notice, unless we are required to keep your personal data longer to comply with the law and any regulatory requirements.

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To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

In some circumstances we may anonymise your personal data so that it can no longer be associated with you, in which case we may use such information without further notice to you.

For further detail of specific retention periods please see the specific sections below.

## **Sharing information**

We may share your personal data with others in certain circumstances. Further detail is provided at the specific sections below but the general sharing undertaken by the Scottish Refugee Council is as follows:

- We contract with third party service providers and suppliers to deliver certain services, including Campaign Monitor, JustGiving, CAF, Everyday Hero, Eventbrite and Mailchimp.
- We may share information with those organisations who provide us with grants (e.g. Scottish Government and the EU) so that we can evidence that the granted funds are being used by us in accordance with the terms of the grant.
- We will also provide your personal data to third parties where there is a legal obligation to do so, for example to regulators, government departments, law enforcement authorities, tax authorities and any relevant dispute resolution body or the courts.
- We may also provide your personal data to third parties in connection with any sale, merger, acquisition, disposal, reorganisation or similar change to our charity.
- We will provide information about you to any other person who is authorised by you to act on your behalf.
- We use Google forms for certain matters, including when you book onto training courses. Please see their [Terms of Service](#)
- To communicate or raise money for our work, we also use online platforms such as Campaign Monitor, Charities Aid Foundation, Just Giving, Everyday Hero and Eventbrite. The privacy notices for these platforms can be viewed using the links below:

[Campaign Monitor](#)

[Charities Aid Foundation Privacy and Cookies](#)

[JustGiving Privacy Policy](#)

[Everyday Hero](#)

[Eventbrite privacy policy](#)

[Mailchimp](#)

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## Where we store and transfer personal data

The personal information that we collect from you will usually be stored inside the UK or the European Economic Area (EEA).

We may transfer data outside the UK or the EEA where our service providers host, process, or store data outside the UK or the EEA. Where we do this, we will ensure that the transfer is to a country covered by a decision of the European Commission or the UK ICO or is otherwise made in circumstances where we have put appropriate safeguards in place to protect your data in accordance with EU standards of data protection laws (e.g. standard contractual clauses, EU-US Privacy Shield compliant, etc.):

[Mailchimp](#)

## 3. USING OUR SERVICES

Scottish Refugee Council offers various services across Scotland, including advice services, training services and community development services. We collect and use personal information differently depending on the type of service provided.

Type of information	Use of information	Lawful basis for use	Specific retention periods
Personal details: <ul style="list-style-type: none"> <li>Name</li> <li>Address</li> <li>Telephone</li> <li>E-mail</li> <li>Personal ID</li> </ul>	<p><b>Advice Services</b></p> <p>We are required to hold the details of the people who have requested our service in order to provide support.</p> <p>All service users are asked to sign a confidentiality mandate when joining our service. We record clients' personal details and information relating to their case on our Case Management System. Access to this database is restricted and all users adhere to Scottish Refugee Council's Confidentiality Policy.</p>	Article 9	Generally for contractual purposes, we keep the data archived for six years after the last contact with the client.
Your personal details such as: <ul style="list-style-type: none"> <li>Name</li> <li>Address</li> </ul>	<p><b>Training</b></p> <p>When you book onto a training course we need these details so that we can process and handle your booking.</p>	Article 6	We keep your information for invoicing purposes.

Type of information	Use of information	Lawful basis for use	Specific retention periods
<ul style="list-style-type: none"> <li>• Telephone</li> <li>• E-mail</li> <li>• Accessibility needs</li> </ul>	<p>We need your accessibility information so that we can make necessary adjustments for you.</p>		<p>We might also keep your details to inform you of future training courses if consent is given from you to do this.</p>
<p>Your personal details such as:</p> <ul style="list-style-type: none"> <li>• Name</li> <li>• Address</li> <li>• Telephone</li> <li>• E-mail</li> </ul>	<p><b>Community Development Services</b>                      We use your data to contact and inform you on community development related activities provided by the Scottish Refugee Council.</p> <p>We record your details in our database. Access to this data is restricted to Community Development Team, who adhere to Scottish Refugee Council's Confidentiality Policy.</p>	<p>Article 6</p>	<p>We keep your data active for one year after the last contact before deletion.</p>
<p>Your email address and the information you choose to provide to us.</p>	<p>For <b>general enquiries</b>, e-mails sent to <a href="mailto:general@scottishrefugeecouncil.org.uk">general@scottishrefugeecouncil.org.uk</a> will be forwarded to specific teams relevant to the enquiry to allow us to deal with your enquiry.</p>	<p>Article 6</p>	<p>Your e-mail will be deleted from the info-mailbox four weeks after the date of receipt.</p>

## 4. SUPPORTING OUR CAUSE

When you sign up to receive our newsletter, take part in a campaign action, attend an event or enquire about opportunities to support our work, we collect information and use it in accordance with this section.

Type of information	Use of information	Lawful basis for use	Specific retention periods
<p>The types of personal information we will ask you for and collect could include:</p> <ul style="list-style-type: none"> <li>• Title</li> <li>• Name</li> <li>• Address</li> <li>• Telephone</li> <li>• E-mail</li> <li>• Personal ID</li> <li>• Opinion about an issue.</li> </ul> <p>At the point of contact we will also ask you how you would like us to contact you again.</p>	<p>We collect information that is needed in order to respond to your request</p>	<p>Article 6</p>	
<ul style="list-style-type: none"> <li>• Name</li> <li>• Address</li> <li>• Bank details</li> </ul>	<p>When you make a donation, whether it is a single or regular donation, we will collect your name, address, and bank details to process the payments. We also ask for your contact details and choice of communication so that we can send you an acknowledgement of the transaction for your records as well as future correspondence on our work and the difference your donation makes.</p>	<p>Article 6</p>	

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You can withdraw your consent to receive marketing communications from us at any time. This can be done in the following ways:

- E-mail: [data@scottishrefugeecouncil.org.uk](mailto:data@scottishrefugeecouncil.org.uk)
- Telephone: 0141 223 7958
- Using unsubscribe link provided.

## 5. APPLYING TO WORK OR VOLUNTEERING WITH US

When you enquire on job or volunteer opportunities, we will ask for and collect information needed to process your application.

Type of information	Use of information	Lawful basis for use	Specific retention periods
The types of personal information we will ask you for and collect will include: <ul style="list-style-type: none"> <li>• Title</li> <li>• Name</li> <li>• Address</li> <li>• Telephone</li> <li>• E-mail</li> </ul>	When you enquire on job or volunteer opportunities, we will ask for and collect information needed to process your application	Article 9	
Employment history	To understand whether you are suited to the role you are applying for		
Qualifications	To understand whether you are suited to the role you are applying for		
Scottish Refugee Council is committed to ensuring equality of opportunity in its recruitment and employment practices so we also collect information about	The information provided will not influence any part of the selection process and will not be shared with the interview panel. All information you disclose will be treated confidentially and will only be used for statistical and monitoring purposes. Should you choose not to provide the details, the success of your application will not be affected.	Article 9	

Type of information	Use of information	Lawful basis for use	Specific retention periods
your age, disability, gender, employment status and ethnicity to help us with equal opportunities monitoring.	Scottish Refugee Council has a diverse workforce and we are committed to ensuring that our staff reflect the communities we serve.		

All information generated and accumulated during a recruitment process is stored for 6 months after the end of the recruitment process in line with our internal HR processes. After 6 months all information for unsuccessful candidates is generally disposed of securely. If applicants are successful, their recruitment information will be retained by us for a longer period and we issue employees with a separate privacy notice.

## 6. BROWSING OUR WEBSITE

### Cookies

When we provide services, we want to make them easy, useful and reliable. Where services are delivered on the internet, this sometimes involves placing small amounts of information on your device - for example, computer or mobile phone. These include small files known as cookies but they cannot be used to identify you personally. These pieces of information are used to improve services for you through, for example:

- enabling a service to recognise your device so you don't have to give the same information several times during one task
- recognising that you may already have given a username and password
- for every web page requested measuring how many people are using services, so they can be made easier to use and there's enough capacity to ensure they are fast

### Google Analytics

Our website uses Google Analytics, a web analytics service provided by Google, Inc. ('Google'). Google Analytics uses cookies, which are text files placed on your computer, to help the website analyse how users use the site.

The information generated by the cookie about your use of the website (including your IP address) will be transmitted to and stored by Google on servers in the United States. Google will use this information for the purpose of evaluating your use of the website, compiling

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reports on website activity for website operators and providing other services relating to website activity and internet usage.

Google may also transfer this information to third parties where required to do so by law, or where such third parties process the information on Google's behalf. Google will not associate your IP address with any other data held by Google.

You may refuse the use of cookies by selecting the appropriate settings on your browser, however, please note that if you do this you may not be able to use the full functionality of our website. By using this website, you consent to the processing of data about you by Google in the manner and for the purposes set out above.

Scottish Refugee Council uses this information to find out how the site is being used, what is working and what we need to improve or change. We do this to ensure that your experience of using our website is as beneficial to you as possible.

## 7. NEW SCOTS CONNECT – MAP and FORUM

### New Scots Connect Map

If you apply to be listed on the New Scots Connect Map as an organisation or community group which supports and works with refugees, you are required to provide details about your organisation in your application form, and some contact details for yourself as a contact/representative of your organisation. We use this information for the following purposes:

Type of information	Use of information	Lawful basis for use
Your name, role, and contact details	To correspond with you regarding your application to be listed and/or your listing	Necessary for our legitimate interests of corresponding with you
Your name, role, and contact details	For publication on the Map	With your prior consent only
Details about your organisation	For publication on the Map	This is not personal data as it relates to an organisation rather than an individual.

With your consent, the information you provide to us is made publically available on the Map.

We keep your information for as long as required for the Map unless you ask that we remove or update the information.

If you are a user of the Map, we do not collect any personal data about you, but the Map may use cookies. Please see the cookies section above.



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## New Scots Connect Forum

If you have been invited to join our New Scots Connect Forum, we may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

- Identity Data** includes your first name and last name
- Contact Data** includes your e-mail address and telephone numbers, and any other contact details that you provide
- User Generated Data** includes information that you upload or add to the Forum
  - **We ask that you refrain from uploading any personal information to the Forum**

We use this information for the following purposes:

Type of information	Use of information	Lawful basis for use
Identity Data Contact Data	To correspond with you regarding the Forum	Necessary for our legitimate interests of corresponding with you
Identity Data Contact Data	To set up a user account for you to access the Forum	Necessary for our legitimate interests of setting up your account
Identity Data Contact Data User Generated Data	To consider, respond to, and deal with any allegations that your User Generated Data is non-compliant with our Terms and Conditions and Acceptable Use Rules related to Forum	Necessary to comply with our Terms and Conditions and Acceptable Use Rules related to Forum
Identity Data Contact Data User Generated Data	To host your User Generated Data on the Forum	Necessary for our legitimate interests of allowing you to access and use the Forum

The Forum is hosted by Basecamp. Therefore all data related to and hosted on Basecamp may be transferred to the US. Basecamp is EU-US Privacy Shield compliant and therefore your personal data will be afforded the same level of protection as if it were in the EU. Please see Basecamp’s privacy policy (<https://basecamp.com/about/policies/privacy>) for further information on how your personal data is used by Basecamp.

Depending on how you use the Forum, other users of the Forum may have access to your personal data.

If you decide to stop using and or leave the Forum, we will not automatically delete accounts, posts, or other User Generated Content. You may request an item to be removed at any time, but we will decide when and if to remove content from our Forum. If you wish to no

longer be identified with our Forum, we may close your account and alter your profile information to remove all identifying characteristics. After account closure, you will no longer be able to participate in this Forum.

## 8. YOUR RIGHTS

Under certain circumstances, you have rights under data protection laws in relation to your personal data.

You have the right to:

**Request access to your personal data** (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.

**Request correction of the personal data** that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.

**Request erasure of your personal data.** This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

**Object to processing of your personal data** where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

**Request restriction of processing of your personal data.** This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

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Request the transfer of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

**Withdraw consent at any time** where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

If you wish to exercise any of the rights set out above, please contact us.

## **No fee usually required**

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

## **What we may need from you**

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

## **Time limit to respond**

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

## **8. USER FEEDBACK/COMPLAINTS**

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues ([www.ico.org.uk](http://www.ico.org.uk)). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.