

SPCB Privacy Notice

This privacy statement explains how we collect and use personal information about you for the following process:

Processing Sales Invoices, Credit Notes and Outstanding Debts

The Categories of Information processed

Normal category data is processed which includes: name, address, telephone number, email address for customers including employees, contractors, businesses which are not limited companies including sole traders, recreational groups (e.g. musicians) and individuals. Additionally, in the event of a sales invoice overpayment bank details would be required.

Source of the information

All sales invoices and credit notes issued by the SPCB must be raised by the Finance Office. Sales invoice and credit note requests which can contain personal data can be made by any business area of the SPCB via a variety of means:

- Sales Invoice Request Form
- Events and Exhibitions Team Invoicing Spreadsheet
- Email request

In addition, personal data may be contained within documentation which provides notification of changes to customer contact details, or in supporting documentation relating to the generation of sales invoices or credit notes e.g. the name and total costs associated with a secondee.

Where business areas obtain personal data for the sole purpose of requesting a sales invoice or credit note; the personal data stored by these business areas will be deleted as soon as the invoice or credit note has been processed.

Personal data may be obtained either directly from the individual e.g. an event organiser or indirectly from the individual e.g. details taken from a secondment agreement and supporting documentation.

The purpose(s) of the processing

During the course of our work we collect/use personal data for the purpose of processing sales invoices and credit notes in order to receive income in return for goods or services provided. Any outstanding debts will become subject to debt recovery procedures. If the debt is unrecoverable then write off action through the losses process will be followed. Any overpayments of invoices are refunded to the debtor or with the debtor's agreement offset against other current debts.

The Legal basis of Processing

The processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract (Art 6(1)(b) GDPR).

Consequences of not providing personal data

Should the data subject not provide the required information we would be unable to provide the goods or services requested.

Data sharing

Where necessary, personal data is shared both internally within the SPCB; and externally with other government agencies and organisations. We share your data with the following:

- Business areas of the SPCB¹
- Internal Audit (and external support) and External Auditors²
- Bank or Building Society (of both the SPCB and the data subject)³
- Other Government agencies⁴

Purpose of data sharing:

¹ Customer data is shared internally with the relevant business areas in order to:

- Set up and maintain customers on the financial accounting system
- Raise a sales invoice or credit note on the financial accounting system
- Follow debt recovery procedures
- Follow the losses procedure for writing-off bad debts

Where relevant, customers personal data is restricted to Finance, the business area, and financial accounting system users.

² All data relating to the sales invoices, credit notes and debtors can be shared (usually on a sample basis) with both internal audit (and support) and external auditors in order to ensure they are processed demonstrating good governance, accountability, integrity and ensure the relevant control measures are in place to reduce risk (Art 6(1)(e) GDPR, s8(d) DPB).

³ Personal data is shared with the relevant Bank or Building Society in order to refund any overpayments of sales invoices (Art 6(1)(b) GDPR).

⁴ The financial accounting system is provided by a third party government agency (Scottish Government) and the SPCB is a user. The government agency can view and access customer details in order to provide administrative, system and

technical support. The Scottish Government is acting as a data processor on behalf of the SPCB in this instance.

Retention of Data

Personal data is retained in both paper and electronic format, access is limited as appropriate and destroyed in line with the SPCB Records Management Retention Schedule. All documentation relating to the set-up of customers and any subsequent changes to details is retained for a period of 2 years. All sales invoices, credit notes and any supporting documentation and documentation relating to the recovery of debts is retained for a period of 6 years plus the current financial year.

Access to the financial accounting system is restricted to Finance where appropriate and ensuring segregation of duties. In addition, as the financial accounting system is provided by a 3rd party government agency (Scottish Government), the Scottish Government can view and access supplier details in order to provide administrative, system and technical support.

Your rights

The GDPR sets out the rights which individuals have in relation to personal information held about them by data controllers. These rights are listed below, although whether you will be able to exercise each of these rights in a particular case may depend on the purpose for which the data controller is processing the data and the legal basis upon which the processing takes place.

Access to your information – You have the right to request a copy of the personal information about you that we hold. For further information, see our Data Subjects' Access Requests Policy.

Correcting your information – We want to make sure that your personal information is accurate, complete and up to date and you may ask us to correct any personal information about you that you believe does not meet these standards.

Deletion of your information – You have the right to ask us to delete personal information about you where:

- You consider that we no longer require the information for the purposes for which it was obtained
- You have validly objected to our use of your personal information – see *Objecting to how we may use your information* below
- Our use of your personal information is contrary to law or our other legal obligations.

Objecting to how we may use your information – Where we use your personal information to perform tasks carried out in the public interest then, if you ask us

to, we will stop using that personal information unless there are overriding legitimate grounds to continue.

Restricting how we may use your information – in some cases, you may ask us to restrict how we use your personal information. This right might apply, for example, where we are checking the accuracy of personal information about you that we hold or assessing the validity of any objection you have made to our use of your information. The right might also apply where this is no longer a basis for using your personal information but you don't want us to delete the data. Where this right is validly exercised, we may only use the relevant personal information with your consent, for legal claims or where there are other public interest grounds to do so.

Please contact us in any of the ways set out in the *Contact information and further advice* section if you wish to exercise any of these rights.

Changes to our privacy statement

We keep this privacy statement under regular review and will place any updates on this website. Paper copies of the privacy statement may also be obtained using the contact information below.

This privacy statement was last updated on [25 May 2018].

Contact information and further advice

If you have any further questions about the way in which we process personal data, or about how to exercise your rights, please contact the Head of Information Governance at:

The Scottish Parliament

Edinburgh

EH99 1SP

Telephone: 0131 348 6913 (Calls are welcome through the Text Relay service or in British Sign Language through [contactSCOTLAND-BSL](#).)

Email: dataprotection@parliament.scot



HAPPY TO **TRANSLATE**

Please contact us if you require information in another language or format.