

## **SPCB Privacy Notice**

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

### **Media contacts distribution lists, including contacts provided by third party providers**

#### **The Categories of Information processed**

'Normal category' data, as defined by the General Data Protection Regulation e.g. names, email addresses, publication titles, phone numbers and job titles of journalists/other business contacts.

#### **Source of the information**

Personal data is provided to us directly from several sources:

1. By data subjects
2. By two third party providers:
  - a. PRGloo – provider of a news release distribution service and media contact database. Sourced via publicly available sources.
  - b. Cision – provider of a media contact database. Sourced via publicly available sources or provided directly by journalists/their employers.

Data may also be acquired by searching publicly available sources where required (e.g. internet search).

#### **The purpose(s) of the processing**

We store and process journalists' professional personal data for the purpose of sending targeted news releases and relevant information relating to the Scottish Parliament to specific audiences (journalists) to promote the work of the Scottish Parliament, in line with journalists' professional function as correspondents reporting on the work of the Parliament.

We also process data relating to journalists when responding to general media enquiries, for the purpose of promoting the work of the Scottish Parliament. This in turn assists journalists in performing their professional functions.

We may also upload a journalist's personal data to the platform provided by PRGloo. This is for the purpose of sending targeted news releases via email from within the PRGloo platform. Where these contact details are also publicly available, PRGloo may store and process this information in accordance with [its commitments to the GDPR principles](#).

We may also hold and store the contact details of other relevant media professionals, including press officers (e.g. political party press officers, Scottish Government media relations teams etc.) and administrative staff. This is for the purpose of promoting the work of the Scottish Parliament, which in turn assists those workers in performing their professional functions.

## **The Legal basis of Processing**

### **Legitimate interest**

For the handling of general media enquiries and sending targeted news content to the media, the legal basis for the processing of personal data is that it is carried out in the legitimate interest of the SPCB. The legitimate interest is engagement with the media and facilitating reporting relating to the Parliament (Art 6(1)(f) GDPR.)

During the course of our work we collect/use personal data relating to other media workers under the legal basis that it is carried out in the legitimate interest of the SPCB. The legitimate interest is the engagement with the media and facilitating reporting relating to the Parliament (Art 6(1)(f) GDPR.)

### **Data sharing**

The personal data is only shared internally within the Media Relations Office and other departments within the Scottish Parliament where necessary.

### **Retention of Data**

Data is retained in electronic format indefinitely or until we are notified that a journalist/media worker has left their post and/or no longer requires contact from the Scottish Parliament's Media Relations Office.

Data may be retained in hard copy indefinitely or until we are notified that a journalist/media worker has left their post and/or no longer requires contact from the Scottish Parliament's Media Relations Office. It is then securely destroyed.

### **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 for the purpose of a legitimate 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](mailto:dataprotection@parliament.scot)



HAPPY TO **TRANSLATE**

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