

## **SPCB Privacy Notice**

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

### **Email bulletins**

We issue email bulletins providing information about the Festival of Politics and events taking place at the Scottish Parliament to persons who have subscribed to this service.

### **The categories of information processed**

In order to send email bulletins, the Scottish Parliament processes “normal category” information, as defined by the General Data Protection Regulation (GDPR). This includes email addresses and names.

### **Source of the information**

The personal information is provided to us directly by individuals (“data subjects”) filling in a subscription form on the Festival of Politics website.

Individuals may also provide details by completing a hard-copy subscription form for the email bulletin or a subscription section on a feedback form, for example, for at a Festival of Politics session. This information will then be added manually to the subscription database by Scottish Parliament staff.

### **The purpose of the processing**

The Scottish Parliament uses the information provided by subscribers in order to send the requested email bulletins about the Festival of Politics.

We may also use the information for statistical purposes in order to improve and develop the service.

### **The legal basis for processing**

The legal basis for holding and processing personal information in the case of the email bulletins is the consent of the data subject (Art 6(1)(a) GDPR).

### **Data sharing and data processing**

We use a UK-based third-party provider (Campaign Master) as a data processor to manage subscriptions and issue email bulletins. Information about Campaign Master’s privacy policy can be found here: <https://campaignmaster.co.uk/privacy-policy/>

Information is stored on its system on secure servers. Access to the system requires a username and password, and personal information about subscribers can be accessed only by a limited number of Parliament staff. With the authorisation of Parliament staff, it may also be accessed by the provider if required in order to resolve a technical issue. It will not be shared with anyone else.

There are separate subscription mechanisms and separate subscription lists for different email bulletins. We will not transfer personal information between lists without the explicit consent of the data subject.

### **Retention of data**

Personal information will remain on the Campaign Master system and will be used to send email bulletins until subscribers choose to unsubscribe. An 'Unsubscribe' link is included on all email bulletins and subscribers can unsubscribe at any time. If they unsubscribe, they will immediately be taken off the distribution list. Personal information will be removed from the system entirely no later than one year from the date on which they unsubscribe.

Hard copies of subscription forms will be stored securely, reviewed regularly and destroyed no more than three months after the individual has unsubscribed.

### **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
- We are using that information with your consent and you have withdrawn your consent – see *Withdrawing consent to using your information* below
- 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*** – You have the right at any time to require us to stop using your personal information for direct marketing purposes.

**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.

**Withdrawing consent to using your information** – Where we use your personal information with your consent, you may withdraw that consent at any time and we will stop using your personal information for the purpose(s) for which consent was given.

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 questions about the way in which we process personal information, 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 and 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.