

## **SPCB Privacy Notice**

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

**Emails containing media enquiries, including to general enquiries email addresses** ([mediarelations@parliament.scot](mailto:mediarelations@parliament.scot); [photography@parliament.scot](mailto:photography@parliament.scot))

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

'Normal category' data, as defined by the General Data Protection Regulation e.g. names, email addresses, telephone numbers, and any other data volunteered by the data subject.

'Special Category' data, as defined by the General Data Protection Regulation (such as race; ethnic origin; political views; religion; trade union membership; health or sexual orientation) would be processed only in instances where this information is volunteered by the data subject.

<p><b>If you intend to add any special category data about anybody other than yourself, please seek that person's consent for doing so.</b></p>
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### **Source of the information**

Personal data is provided to us directly from individuals (data subjects) via email, including to two generic email addresses used by the media relations office ([mediarelations@parliament.scot](mailto:mediarelations@parliament.scot); [photography@parliament.scot](mailto:photography@parliament.scot)).

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

During the course of our work we collect/use personal data for the purpose of ensuring media enquiries are answered in a timely manner.

### **The Legal basis of Processing**

For the handling of media enquiries, 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 media relations and wider public engagement (Article 6(1)(f) GDPR.)

For enquiries containing other special category data that does not relate to an Equality requirement, the legal basis for processing is that it is necessary for the performance of a task carried out in the substantial public interest (Article 9(2)(g), section 10(3) of and paragraph 6, Part 2 of Schedule 1 to the Data Protection Act 2018). The task is to facilitate an accessible and restriction-free way of access for members of the public to engage with the Parliament and send enquiries about any subject. The accessibility of the Parliament as a public body that represents the Scottish public is in the substantial public interest.

The processing does not interfere with the rights of the data subjects disproportionately because they provide the information themselves, they are not under an obligation to provide it to us and we keep it only for the minimum time necessary to respond to or otherwise deal with the enquiry.

## **Data sharing**

The personal data is only shared internally with other departments within the Scottish Parliament where necessary.

## **Retention of Data**

The personal data is held securely with restricted access and is retained until the enquiry is answered and routinely deleted from email inboxes.

Enquiries of operational value will be securely stored in electronic format and destroyed in line with the SPCB Records Management Retention Schedule (Media enquiries of long-term operational value: End of Session + 10 years; Media enquiries of short-term operational value: End of Session +3 years).

## **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 4 September 2020 and will be reviewed within 12 months if not updated prior to that.

## **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.

Date	Version	Summary of changes
25/05/2018	1.0	N/A
04/09/2020	2.0	Privacy Notice updated to include reference to the Data Protection Act 2018.