



# Inverness, Badenoch and Strathspey Citizens Advice Bureau Privacy Policy

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At Inverness, Badenoch and Strathspey Citizens Advice Bureau we collect and use your personal information to help solve your problems, improve our services and tackle wider issues in society that affect citizens in Scotland.

We only ask for the information we need, let you decide what you're comfortable telling us, and explain why we need it. We also treat it as confidential.

When we record and use your personal information, we:

- Only access it when we have a good reason
- Only share what is necessary and relevant
- Don't sell it to anyone.

We handle and store your personal information in accordance with the law. If we need to record any sensitive information, we will get your consent to do so. You can withdraw your consent at any time by contacting: **Inverness, Badenoch and Strathspey Citizens Advice Bureau, 29-31 Union Street, Inverness, IV1 1QA.**

## **Who's responsible for keeping your personal information safe?**

Citizens Advice Scotland and each individual bureau within the network are responsible for keeping your personal information safe and making sure we comply with data protection law. This means we are 'joint data controllers' of your personal information.

Each local Citizens Advice Bureau is an independent charity and along with Citizens Advice Scotland (CAS), is a member of the Scottish Association of Citizens Advice Bureaux (SACAB). This means we use your information for monitoring purposes, our research and campaigning work and to keep improving our service for citizens in Scotland.

## **Working on your behalf**

When you give us authority to act on your behalf, for example to help you with a Universal Credit claim, we may need to share information with a third party (including but not limited to government and local agencies). Where we share information with a third party we will first seek your express consent.

## **What happens if you visit our website?**

When you browse our website, we collect 'cookies' to help us understand more about how our site is used by visitors, and to develop and enhance our services to you. A 'cookie' is a bit of information kept on your computer. It tells us things like what device you're using and what pages you click on. We use cookies to:

- Track aspects of user visits, including the length of a user's visit, their browser, geographic location and the use of the search facility on this website
- Remember users selected contrast and/or text resizing style preferences for this website
- Record a user's video preferences for our videos viewed on this website.

### **When we would use your information without your permission**

At times we might need to use or share your information without your permission. If we do, we'll always make sure there's a legal basis for it. This could include situations where we have to use or share your information:

- To comply with the law, called '**legal obligation**' - for example, if a court orders us to share information
- To protect someone's life, called '**vital interests**' - for example, sharing information with a paramedic if a client was unwell at the bureau or one of our outreaches
- To carry out our aims and goals as an organisation, called '**legitimate interests**' - for example, to create anonymous case studies and statistics for our national research
- For us to carry out a task in the public interest or for our official functions, and the task or function has a clear basis in law, called '**public task**' - for example the Consumer Service
- To carry out a contract we have with you, called '**contract**' - for example, if you're an employee we might need to store your bank details so we can pay you
- To defend our **legal rights** - for example, to resolve a complaint that we gave the wrong advice.
- For the PASS project, as it is a statutory service, the personal data for that project is processed on the following legal bases:
  - Personal data as part of advice and support – Public Task
  - Special category data as part of advice and support – Public Interest
  - Client special category profiling data - Consent

### **What are my rights?**

You have rights under data protection law that relate to the way we process your personal data. More information on these can be found on the Information Commissioner's website. If you would like to exercise any of these rights, please contact: **Inverness, Badenoch and Strathspey Citizens Advice Bureau, 29-31 Union Street, Inverness, IV1 1QA.**

Your rights include:

- The right to access the personal information that we hold about you
- The right to ask us to correct any inaccurate personal information we hold about you
- The right to ask us to erase any information we hold about you, although this will only apply in certain situations due to us processing your data on the basis of 'legitimate interests'

- The right to restrict our processing of the personal information we hold about you. This will only apply in situations such as:

you are disputing the accuracy of the information we hold

where we no longer need to use the information but it is needed for legal claims

The right to receive personal information, which you have provided to us, in a structured commonly used and readable format.

## **What we do with your information**

First and foremost, your information will be used to provide you with advice. In addition we share anonymised statistical data that we can use for research purposes to show the value and impact of our service to funders and others who are interested in our work, such as external auditors who want to make sure we are giving you high quality advice. We may also use it to refer you to any specialist services out with SACAB. A record of your case will be kept on our secure electronic case management system hosted by CAS. Employees of CAS or other Citizens Advice Bureaux in Scotland may access this record, where necessary, in order to provide advice seamlessly across the Scottish network of Citizens Advice Bureaux. We may also retain a paper file if required to progress and manage your case.

Some of our services are also subject to external audit by the Scottish Legal Aid Board (SLAB). They check that we are providing you with the highest quality of service and are allowed to access your information (if randomly selected) under the legal basis of 'public task'.

How we handle your personal information depends on how you interact with us. We obtain your informed consent to collect information and you may be asked to sign a Client consent mandate. We retain information on a legitimate interest basis to manage and assist with your enquiries.

We also have additional privacy policies including if you:

Get advice from a debt adviser or a PASS adviser

Have a Pension Wise appointment.

If you want to make a complaint about our service.

If you have been contacted to help with research, campaigns or news.

If you use our website.

## **Changes to the privacy policy and your duty to inform us of changes**

We keep our privacy policy under regular review. This version was reviewed in April 2023.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.