

# General Data Protection Regulation

## Inverness, Badenoch & Strathspey CAB



## CLIENT PRIVACY POLICY

At Inverness Badenoch & Strathspey CAB, 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 line 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 & Strathspey Citizens Advice Bureau, 29-31 Union Street, IV1 1QA or email [bureau@invernesscab.casonline.org.uk](mailto:bureau@invernesscab.casonline.org.uk)

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

Citizens Advice Scotland and Inverness Badenoch & Strathspey CAB are both responsible for keeping your personal information safe and making sure we comply with data protection law. This means we are 'joint data controllers' for 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'll need to share information with that third party. For example we may share information with the Highland Council and the local Job Centre as appropriate

### **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

### **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 & Strathspey CAB, 29-31 Union St, Inverness IV1 1QA or email [bureau@invernesscab.casonline.org.uk](mailto:bureau@invernesscab.casonline.org.uk)

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. This also includes us sharing 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.

Eg. Anonymised information will be shared with the Scottish Government for PASS, Poppy Scotland for ASAP and OFGEM for Energy Best Deal appointments

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 get your permission to store this detail by requesting you complete a Client Permission and Consent Form.