**SHRC Privacy Notice –SNAP 2 Draft Proposal Survey**

**Purposes of processing**

The SHRC is publicly consulting on the draft proposal for Scotland’s second National Action Plan for Human Rights (SNAP 2). The information collected will help inform the development of SNAP 2. It will also be used to provide updates to people who wish to be kept informed about SNAP 2.

**Collecting and holding personal data**

The SHRC processes any personal data you send to it under the requirements of the General Data Protection Regulation (EU) 2016/679 (the GDPR), the Data Protection Act 1998 (the DPA) and any Acts that replace the Data Protection Act 1998.

Personal data consists of data from which a living individual may be identified. The SHRC will hold any personal data securely and will use it only for the purposes it was collected for. Further information about the data protection legislation and your rights is available here:

<https://ico.org.uk/for-the-public/is-my-information-being-handled-correctly/>

**Categories of information**

The survey asks for your opinion about SNAP themes as well as the area of the country you come from or represent. It also asks that you provide us with an email address should you wish to be kept informed of the future development of SNAP 2. We recognise that although we do not ask specifically for any uniquely identifying information there may be circumstances where you could be identified as an individual given the nature of the questions; some of this information may be considered “sensitive” or “special category” personal data.

**The legal basis for processing**

Data protection law states that we must have a legal basis for handling your personal data. The legal basis for collecting and holding your personal data is your consent to our use of your personal data for the purpose of informing future SNAP work (Art 6(1)(a) GDPR). By completing the survey, you are giving us your consent to collect and hold your personal data in this way.

You are not required to complete the survey, and you can decline to answer any individual question within the survey. We will use the data received from the survey to inform the development of SNAP 2.

**Survey Monkey**

The data will be collected via Survey Monkey which is a third party online survey system enabling the SHRC to collect and analyse survey information. The privacy policy for Survey Monkey is available here:

<https://www.surveymonkey.co.uk/mp/legal/privacy-policy/>

**How your data will be stored and processed**

Survey responses will be collected and stored on the Survey Monkey server. The survey and survey responses will be protected by a password and only authorised staff of the SHRC will have access to them. We will make sure that survey responses are kept securely and that any reports or published information derived from the survey produced in a way so that no individual respondent can be identified.

The responses will be downloaded from Survey Monkey at the end of the consultation process by one or more authorised SHRC staff members who will be designated to carry out the analysis. The data, once extracted, will be stored on the SHRC’s secure servers. Access to the data can be tracked and monitored.

The SHRC will only use these survey results to inform the future work of SNAP 2.

**Retention and deletion of data**

Data, made up of your survey response, will normally be retained in electronic format for a period of 12 months on the SHRC secure servers after the end of the consultation period. Thereafter, your response will be deleted. Any published results of the survey will not include individual survey responses and will not enable individuals to be identified.

**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** –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 to 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. Where we have not yet incorporated your data into a statistical analysis, we will not do so after you have withdrawn your consent and delete all your data. Please note that once your data has been aggregated into an anonymised statistical report, we will not be able to extract your data from that report.

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.

**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 Corporate Services at:

SHRC, Bridgeside House, 99 McDonald Road, Edinburgh, EH7 4NS

Telephone: 0131 297 5750

Email: hello@scottishhumanrights.com