Data Protection Privacy Notice

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| Document Owner: | SNAP Secretariat  |
| Last Reviewed:  | March 2022 |
| Next Review Due:  | March 2024 (or earlier if SNAP host changes from Scottish Human Rights Commission) |
| Key Changes Made:  | New policy for launch of SNAP Leadership Panel. |

# Introduction

This is the Privacy Notice of Scotland’s National Action Plan for Human Rights (SNAP).

The SNAP Leadership Panel is an independent public body set up to oversee and govern SNAP, Scotland’s National Action Plan for Human Rights. The Leadership Panel role and responsibilities are set out in its Terms of Reference.

This policy takes effect from the formation of the SNAP Leadership Panel and is in force for the period while the Scottish Human Rights Commission hosts SNAP.

# How we use your information generally

This Privacy Notice explains how we collect and use personal information about you.

In general terms, we collect and use personal information to fulfil the following functions and associated activities of SNAP:

* General business purposes, including reviewing, revising, finalising, launching, monitoring and overseeing SNAP.
* Acting as a Secretariat for the SNAP Leadership Panel and SNAP more generally.
* Advertising, marketing and public relations.
* Accounts and records.
* Information and databank administration.

# Specific privacy statements

The following privacy statements contain detailed information on how we handle personal data in relation to each of our specific functions and activities.

## Freedom of Information (Scotland) Act 2002

Please Note: SNAP is covered by the Freedom of Information (Scotland) Act 2002. The Act requires us to disclose information we hold to the requester unless we are permitted to withhold it by an exemption. This includes personal data we hold. If the request covers personal data, the interests of the data subject must be considered but ultimately, we may be required by law to release the information to the person who has made the request.

For more information on the Freedom of Information (Scotland) Act 2002, please visit the website of the Office of the Scottish Information Commissioner:

<http://www.itspublicknowledge.info/home/ScottishInformationCommissioner.aspx>

## Contacting SNAP

* Meeting and event bookings and related enquiries
* General correspondence
* Our use of photography and video
* Expenses payments

## Events and exhibitions

* Events request form
* Arranging external catering for events
* Arranging deliveries for events
* Database of commercial contacts for events
* Collecting information from events’ organisers for invoice purposes
* Events guest lists
* Speakers / presenters information
* Event email bulletins

## Using our website and our use of social media

* Use of social media

## Health and safety

* Records of unacceptable behaviour and actions by members of the public.

## SNAP business - general

* Minutes
* Leadership Panel Member contact list
* Leadership Panel Member general correspondence

## Data protection and Freedom of Information

* Processing Subject Access Requests
* Processing Freedom of Information requests
* Reporting of data breaches

## Complaints

* Complaints under out complaints policy, including complaints about Leadership Panel Members or the SNAP Secretariat

## Media and broadcasting

* Broadcasting – enquiries from the public
* Broadcasting - freelance contact data
* Emails containing media enquiries
* Media contacts distribution list

## Recruitment

* Employee recruitment

## Information about external visitors

* Biographical information of external visitors

## Contractors and suppliers

* Procurement – delivery and maintenance of SNAP contracts
* Processing Payment of Invoices and Reimbursement of Fees and Expenses
* Processing payment of invoices and supplier information
* Processing Sales Invoices, Credit Notes and Outstanding Debts
* Interacting with suppliers of goods

## Using our website

The Commission uses cookies to gather information about how visitors use the SNAP website to help us improve its performance, and secondly, to improve the visitor experience when using the website by delivering pages more quickly or remembering user settings.

Additionally, videos on the website use cookies created by third-party providers such as Flash or YouTube.

The information we collect is anonymous - it cannot be used to identify you personally.  Further information on the way that we use cookies is available in our [Cookie Policy.](https://www.snaprights.info/your-privacy)

## Your rights

The UK 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 (see the individual privacy notices listed above for further details in relation to specific processing activities).

*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.  In addition, 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.

*Automated processing* – if we use your personal information on an automated basis to make decisions which significantly affect you, you have the right to ask that the decision be reviewed by an individual to whom you may make representations and contest the decision.  This right only applies where we use your information with your consent or as part of a contractual relationship with you.

*Withdrawing consent 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 2 March 2022.

# 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 SNAP Secretariat:

Scotland’s National Action Plan for Human Rights

Bridgeside House

99 McDonald Road

Edinburgh

EH7 4NS

Email: actionplan@scottishhumanrights.com

Phone: 0131 297 5750

# Complaints

We seek to resolve directly all complaints about how we handle personal information but you also have the right to lodge a complaint with the Information Commissioner’s Office:

Online: <https://ico.org.uk/global/contact-us/email/>

By phone: 0303 123 1113

By post: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, SK9 5AF

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