

Centre for Scottish Public Policy Privacy Notice

Who We Are

Centre for Scottish Public Policy

The Centre for Scottish Public Policy (CSPP) is a leading, independent, membership based, cross-party & none-party think tank. We are interested in all aspects of public policy and the manner in which changes in public policy can impact on the people and places of Scotland to enhance our lives.

In order to be able to undertake our work and inform our network about the activities and resources related to this, we make use of personal information – almost wholly basic contact details – which users provide us with. In this notice you can read how we collect and use personal information, as well as your rights in relation to this. If you have any questions, please don't hesitate to [contact us](#).

Importantly, any personal data collected through this website and held by CSPP, Brightstar Scotland or its associates is treated in line with the principles of the General Data Protection Regulation 2016. The website for CSPP is created with NationBuilder, a trading name of 3DNA Corp. 3DNA Corp complies with the EU-US [Privacy Shield Framework](#) regarding data protection requirements.

Processing and Use of Personal Information

Lawful Basis for Processing Personal Data

GDPR Art 6 (1) (a) Consent: the individual has given consent to the processing of his or her personal data for one or more specific purposes.

Where users have previously bought or solicited products or services from CSPP, 'legitimate interests' (GDPR Art 6 (1) (f) may also act as a basis for legal processing and communication.

Data will be held in compliance with the GDPR as set out in our privacy policy, and used in accordance with the specified purposes as set out in this policy.

Purposes of Data Processing and Storage

To inform about news, events, projects and other initiatives related to the work of CSPP.

To inform our members of information regarding membership benefits and the annual member renewal process.

To hold and process invoices sent by users to CSPP for membership or event booking payments.

Communication from CSPP may take the form of direct email correspondence, or bulletins sent via our Nation-Builder account. Notices may also include information about the activities of our member and partner organisations.

Data Retention and Rights of the Data Subject

CSPP will keep personal information as long as it is necessary for the purpose for which it was obtained, in compliance with existing regulations and unless asked to delete it at an earlier time. Data subjects have [the following rights](#), including the right to erasure (the 'right to be forgotten') as set out in GDPR Articles 12-23.

It is the responsibility of the Joint Controllers to observe these rights and act upon requests in relation to these rights from individuals whose personal data is held by CSPP.

Data Controllers and Processors

The Controllers and Processors of personal data are the Chair of the CSPP Board, as well as Brightstar Scotland, who provide professional services on behalf of CSPP. The lead Joint Controller is Elaine Bone, contactable at: elaine@brightstarscotland.co.uk.

Furthermore, CSPP's appointed bookkeeper, June Douglas, will have access to the necessary personal data, such as membership subscription, name and email address, as required for the purposes of processing event and membership invoices.

Data Storage and Protection

Personal information may be stored in one of the following locations: CSPP NationBuilder Account; CSPP Gmail or Microsoft Outlook Accounts; or Brightstar Associate computer hard-disk.

Users are encouraged to read the privacy and data protection policies of our data storage services, which can be found here: [Dropbox Privacy Policy](#); [3dna Corp. Privacy Policy](#); [Google Privacy Policy](#); [Microsoft Privacy Statement](#).

Under GDPR regulations, CSPP staff, Data Controllers and Data Processors have a duty to report any data breach to the UK Information Commissioner's Office.

Data Audit

CSPP retains an audit of the type of personal information held, where this data is held, and the purpose and legal basis for processing this data. This can be provided upon request.

Information Sharing and Third Parties

CSPP does not share personal information with third party organisations. Though we make every effort to preserve user privacy, we may need to disclose personal information when required by law wherein we have a good-faith belief that such action is necessary to comply with a current judicial proceeding, a court order or legal process served on our web site.

Information We Collect

CSPP uses the NationBuilder platform both as our website at <http://www.cspp.org.uk/> and customer relationship management system (CRMS) to organise our community of members and

supporters, as well as our service to send out email bulletins. You can read more about that company, features and policies at [NationBuilder.com](http://www.nationbuilder.com). You can also access its [privacy policy](#) here.

User-Provided Information

You can provide us with information about yourself, such as your name and e-mail address, by registering with www.scotlandstowns.org (including by “following,” “liking,” linking your account to www.scotlandstowns.org, etc., on a third party social media website or network). If you correspond with us by email, we may retain the content of your email messages, your email address and our responses. We may also retain any messages you send through www.scotlandstowns.org. You may provide us with information in user content you post to <http://www.cspp.org.uk/>.

Newsletter and Website Registration

A user does not have to register to use CSPP’s website, but a user must register if they wish to receive information and updates via email.

We use a third-party provider, NationBuilder, to deliver our newsletter. We gather statistics around email opening and clicks using industry standard technologies to help us monitor and improve our e-newsletter. For more information, please see NationBuilder’s privacy notice.

The registration information we require to allow a user to register is the full name and email address of the user if they wish to receive email updates. This information is stored securely on our database until such time as a user chooses to unsubscribe from receiving news stories. Users who no longer wish to receive our newsletters and other updates may opt-out of receiving these communications by clicking unsubscribe option on any email communication received or by contacting the Joint Controllers or CSPP via the ‘contact us’ form on our website.

Event Ticketing and Membership Subscriptions

Event bookings, event ticketing and membership subscription requests made via <http://www.cspp.org.uk/> are routed through CSPP’s NationBuilder account.

Those wishing to book for an event must complete the RSVP form detailing first name, last name and email address. Optional information may be provided by the user as displayed. To “pay by invoice”, users will also need to enter either an email address for an email invoice, or a postal address for a hard copy invoice.

Website users have the option to purchase event tickets or membership subscriptions via an invoice request through NationBuilder [see website and privacy information below], or via PayPal. If using PayPal, users submitting financial information are encouraged to read the [Privacy Policy for PayPal Services](#).

As stated above, CSPP’s appointed accountant will also have access to the necessary personal information for the processing of invoices, including name, email or postal address, and bank account and sort code if submitted by the user.

Events

We typically provide an attendee list of names and organisational affiliation at our events to aid delegates with networking. Furthermore, we take photographs of proceedings in order to highlight or showcase CSPP's activities. You will be asked to provide consent for this use of your data in this way when signing up for events, and are freely able to refuse to provide this.

Surveys

From time-to-time our site requests information from users via surveys. Participation in these surveys is completely voluntary and the user therefore has a choice whether or not to disclose this information. The requested information typically includes contact information (such as name and address), and geographic information (such as postal code). Contact information will not be shared with any third parties unless we give prior notice and choice. Though we may use an intermediary to conduct these surveys, they may not use users' personally identifiable information for any secondary purposes.

Information Sharing - Legal Disclaimer

Though we make every effort to preserve user privacy, we may need to disclose personal information when required by law wherein we have a good-faith belief that such action is necessary to comply with a current judicial proceeding, a court order or legal process served on our web site.

Website and Third Parties

Disclaimer

CSPP seeks to ensure that the information published on its website is up to date and accurate. However, the information on the website does not constitute legal or professional advice and CSPP cannot accept any liability for actions arising from its use. CSPP cannot be held responsible for the contents of any pages referenced by an external link.

Web Services and Cookies

When you visit <http://www.cspp.org.uk/>, NationBuilder may send one or more cookies - a small text file containing a string of alphanumeric characters - to your computer that uniquely identifies your browser and lets NationBuilder help you log in faster and enhance your navigation through www.scotlandstowns.org. A cookie does not collect personal information about you. A persistent cookie remains on your hard drive after you close your browser. Persistent cookies may be used by your browser on subsequent visits to the site. Persistent cookies can be removed by following your web browser's directions. A session cookie is temporary and disappears after you close your browser. You can reset your web browser to refuse all cookies or to indicate when a cookie is being sent. However, some features of <http://www.cspp.org.uk/> may not function properly if the ability to accept cookies is disabled.

Cookies are text files which identify users' computers to the CSPP server. The website then creates "session" cookies to store some of the preferences of users moving around the website, e.g. retaining a text-only preference. Cookies in themselves do not identify individual users but identify only the device used and they are deleted on departure from the website. Many websites do this to track traffic flows, whenever users visit those websites.

Users have the opportunity to set their devices to accept all cookies, to notify them when a cookie is issued, or not to receive cookies at any time. The last of these means that certain personalised services cannot then be provided to that user.

You can read more about how the NationBuilder service interacts with and protects your information at nationbuilder.com/privacy and nationbuilder.com/confidentiality.

Log files

Log files stored on the CSPP web server allow the recording and analysis of users' use of the website. Log files do not contain any personal information.

Links

This Website contains links to other sites. Please be aware that CSPP is not responsible for the privacy practices of such other sites, and additionally cannot verify the accuracy of the information contained on external sites - by linking to them, we are not endorsing them. We encourage our users to be aware when they leave our site and to read the privacy statements of each and every Website that collects personally identifiable information. This privacy statement does not apply to information collected by other websites.

Changes and Notifications

Access and Changes to Your Personal Information

You have the right to request, change, or delete personal information we hold about you (such as postal code, phone, email or postal address). This can be done by sending a request to elaine@brightstarscotland.co.uk or contacting CSPP via its website.

Under the General Data Protection Regulation, individuals whose personal data is held by CSPP have the right make a subject access request for their personal data processed by CSPP for stated purposes. As stated earlier in this notice, data subjects have [the following rights](#), including the right to erasure (the 'right to be forgotten') as set out in GDPR Articles 12-23.

Notification of Changes

If we decide to change our privacy policy, we will post those changes to this privacy statement, and other places we deem appropriate so our users are always aware of what information we collect, how we use it, and under what circumstances, if any, we disclose it. If, however, we are going to use users' personally identifiable information in a manner different from that stated at the time of collection we will notify users via email or by posting a notice on our Web site for 30 days.

Contact Information

If users have any questions or suggestions regarding our privacy policy, please contact Elaine Bone at elaine@brightstarscotland.co.uk.

Policy last updated: May 2018