

GDPR Privacy Notice



Document Revision Record

| Latest Issue | Purpose of Issue | Checked By | Date Checked | Approved By | Date Approved |
|--------------|---------------------------|------------|--------------|-------------|---------------|
| A1 | New Policy | VS | 25/05/18 | JM | 25/05/18 |
| B1 | Formal Issue | VS | 25/05/18 | JM | 25/05/18 |
| C1 | Data Controller Revisions | ME | 17/06/19 | JM | 03/07/19 |

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DATA PRIVACY NOTICE

P2ML

Your personal data – what is it?

Personal data relates to a living individual who can be identified from that data. Identification can be by the information alone or in conjunction with any other information in the data controller's possession or likely to come into such possession. The processing of personal data is governed by [the General Data Protection Regulation 2016/679 (the "GDPR")

Who are we?

P2ML is the data controller (contact details below). This means it decides how your personal data is processed and for what purposes.

How do we process your personal data?

- P2ML complies with its obligations under the GDPR by keeping personal data up to date;
- by storing and destroying it securely; by not collecting or retaining excessive amounts of data;
- by protecting personal data from loss, misuse, unauthorised access and disclosure and by ensuring that appropriate technical measures are in place to protect personal data. We use your personal data for the following purposes: - (examples shown below)
 - To manage our employees, contractors and agents;
 - To maintain our own accounts and records.
 - To operate the P2ML web site and deliver the services that individuals have requested.
 - To inform individuals of news, events, activities or services running at P2ML.
 - To contact individuals via surveys to conduct research about their opinions of current services or of potential new services that may be offered.

Please note that the list is not exhaustive, and you may process personal data for other purposes, which will need to be recorded. Remember, at the heart of this is ensuring that individuals are aware of exactly what you are going to do with their personal data and giving them the opportunity to consent where necessary.

What is the legal basis for processing your personal data?

These fall under either article 6 or article 9 – dealt with separately below.

E.g. Article 6 processing

- Consent of the data subject;

- Processing is necessary for the performance of a contract with the data subject or to take steps to enter into a contract;
- Processing is necessary for compliance with a legal obligation;
- Processing is necessary to protect the vital interests of a data subject or another person;
- Processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the data controller;
- Processing is necessary for the legitimate interests of the data controller or a third party, except where such interests are overridden by the interests, rights or freedoms of the data subject.

E.g. Article 9 Processing

- Explicit consent of the data subject; For example, to be able to tell people about events, news, services]
- Processing is necessary for carrying out obligations under employment, social security or social protection law, or a collective agreement;
- Processing is necessary to protect the vital interests of a data subject or another individual where the data subject is physically or legally incapable of giving consent;
- Processing relates to personal data manifestly made public by the data subject;
- Processing is necessary for the establishment, exercise or defence of legal claims or where courts are acting in their judicial capacity;
- Processing is necessary for reasons of substantial public interest on the basis of EU or Member State law;
- Processing is necessary for reasons of preventative or occupational medicine, for assessing the working capacity of an employee, medical diagnosis, the provision of health or social care or treatment or management of health or social care systems and services on the basis of EU or Member State law or a contract with a health professional;
- Processing is necessary for the reasons of public interest in the area of public health;

Sharing your personal data

Your personal data will be treated as strictly confidential and will not be shared outside P2ML.

We will only share your data with third parties outside of the organisation with your consent.

How long do we keep your personal data?

We keep your personal data for no longer than reasonably necessary. For financial and similar records, these will be kept for a period of 7 years, as required by HMRC.

Your rights and your personal data

Unless subject to an exemption, under the GDPR, you have the following rights with respect to your personal data: -

- The right to request a copy of your personal data which P2ML holds about you;
- The right to request that P2ML corrects any personal data if it is found to be inaccurate or out of date;
- The right to request your personal data is erased where it is no longer necessary for P2ML to retain such data;
- The right to withdraw your consent to the processing at any time;
- The right to request that P2ML provide the data subject with his/her personal data and where possible, to transmit that data directly to another data controller, (known as the right to data portability), (where applicable)
- The right, where there is a dispute in relation to the accuracy or processing of your personal data, to request a restriction is placed on further processing;
- The right to object to the processing of personal data;
- The right to lodge a complaint with the Information Commissioners Office. <https://ico.org.uk/make-a-complaint/>
- Transfer of Data Abroad If the personal data is to be transferred to countries or territories outside the EU you must include details of how the data will be protected, together with details of how to obtain copies of the relevant safeguards].

Further processing

If we wish to use your personal data for a new purpose, not covered by this Data Protection Notice, then we will provide you with a new notice explaining this new use prior to commencing the processing and setting out the relevant purposes and processing conditions.

Where and whenever necessary, we will seek your prior consent to the new processing. Contact details to exercise all relevant rights, queries of complaints please in the first instance, contact us at:

P2ML Data Controller, 7 Blair Court, North Avenue, Clydebank Business Park, Glasgow, G81 2LA