

Privacy Notice for the Cross Party Group (CPG) on End of Life Choices

Introduction

Friends at the End is committed to data security and the fair and transparent processing of personal data. This privacy policy sets out how we will treat the personal data which you provide to us in compliance with applicable data protection law, in particular the General Data Protection Regulation (EU) 2016/679 (GDPR).

This policy sets out who we are, how and why we collect, store, use and share personal data, your rights in relation to your personal data, and how to contact us and supervisory authorities if you would like to report a concern about the way in which we process your data.

Who are we?

Friends at the End (FATE) is a Registered Scottish Charitable Incorporated Organisation. Our SCIO number is SC048875. Our registered address is Friends at the End, Office 7, Unit 2, Kirkhill House Office Park, Glasgow, G77 5LL.

For the purposes of the GDPR, FATE are the 'controllers' of the personal data you provide to us.

FATE is secretariat of the Cross Party Group in the Scottish Parliament on End of Life Choices in the Scottish Parliament. Personal data collected for this purpose will only be used to administrate the Group's activities.

What personal data do we collect?

We may collect and process the following personal data:

Information you provide to us

When you apply to become a member of the Cross Party Group, we will collect:

- Your name and e-mail address;
- Your organisation and job title, where applicable;
- Information about any associations you have with end of life issues.

This is to enable the Secretariat to make decisions about your suitability as a member in line with the agreed membership criteria.

We may collect your name, e-mail address, postal address and telephone number if you:

- correspond with us by phone, e-mail, or in writing;
- report a problem.

Information we collect about you

If you visit our website, we may automatically collect information about your activity via cookies. We only use this information for statistical analysis purposes and then the data is removed from the system.

For more information please see the Friends at the End website <https://www.friends-at-the-end.org.uk/privacy-cookie-policy/>

Information we receive from other sources

We also receive information about you if you provide it to other joint secretary/s of the Cross Party Group, to allow us to share administration of the Group.

How do we use your personal data?

When we ask you to supply us with personal data we will make it clear whether the personal data we are asking for must be supplied so that we can provide services to you, and whether the supply of any personal data we ask for is optional.

Legitimate interests:

We may use your personal data where this is necessary for purposes which are in our legitimate interests.

These interests are:

- communicating with you about activities carried out by the Cross Party Group;
- communicating with you about activities carried out by member organisations of the Cross Party Group which may be of interest to you;
- communicating with you in relation to any issues, complaints, or disputes;
- improving the quality of experience when you interact with the Cross Party Group, for example via surveys;
- complying with the rules for Cross Party Groups in the Scottish Parliament, overseen by the Standards, Procedures and Public Appointments Committee. These include:
 - providing minutes of all meetings, including an attendance list, which will be made publicly available;
 - providing an Annual Return, including a membership list, which will be made publicly available.

More information on the Cross Party Group rules may be found here:

<http://www.parliament.scot/msps/102152.aspx>

You have the right to object to the processing of your personal data on the basis of legitimate interests as set out below, under the heading **Your Rights**.

Where required by law:

We may also process your personal data if required by law, including responding to requests by government or law enforcement authorities, or for the prevention of crime or fraud.

Who do we share your personal data with?

We will share your personal data with other joint secretary/s of the Cross Party Group, to allow us to share administration of the Group.

We will provide data to the Standards, Procedures and Public Appointments Committee in the Scottish Parliament in order to comply with the rules for Cross Party Groups. This will include minutes of all meetings, including an attendance list, and an Annual Return, including a membership list. These will be made publicly available.

We may share your personal data with trusted third parties, including service providers contracted to us in connection with provision of the products and services such as providers of IT services and customer relationship management services, e.g. marketing services; analytics and search engine providers that assist us in the improvement and optimisation of our websites.

We will ensure there is a contract in place between us and the third parties listed above, which will include obligations in relation to the confidentiality, security, and lawful processing of any personal data shared with them.

Where a third party recipient is located outside the European Economic Area, we will ensure that the transfer of personal data will be protected by appropriate safeguards, namely the use of standard data protection clauses adopted or approved by the European Commission where the data protection authority does not believe that the third country has adequate data protection laws.

We will share personal data with law enforcement or other authorities if required by applicable law.

How long will FATE keep your personal data?

If your membership of the Cross Party Group is declined on application, we will destroy your data within three months.

If your membership of the Cross Party Group is approved, we will retain your personal data for the duration of your membership of the Cross Party Group, and for a period of one year following its termination or expiry, to ensure we are able to comply with any contractual, legal, audit and other regulatory requirements, or any orders from competent courts or authorities.

You may change your preferences or unsubscribe from communications at any time by contacting FATE directly at the email or postal address given below.

Where do we store your personal data and how is it protected?

We take all reasonable steps to ensure that our staff protect your personal data and are aware of their information security obligations. We limit access to your personal data to those who have a genuine business need to know it.

We take reasonable steps to protect your personal data from loss or destruction. We also have procedures in place to deal with any suspected data security breach. We will notify you and any applicable regulator of a suspected data security breach where we are legally required to do so.

Once we have received your personal data, we will use strict procedures and security features to try to prevent unauthorised access.

When required, electronic data will be deleted securely and paper records will be shredded. The date this happens will be recorded. Electronic data held in our secure backup will be automatically wiped 90 days after it is deleted by FATE.

Your Rights

Under the GDPR, you have various rights with respect to our use of your personal data:

Right to Access

You have the right to request a copy of the personal data that we hold about you by contacting us at the email or postal address given below. Please include with your request information that will enable us to verify your identity. We will respond with 30 days of request.

Please note that there are exceptions to this right. We may be unable to make all information available to you if, for example, making the information available to you would reveal personal data about another person, if we are legally prevented from disclosing such information, or if your request is manifestly unfounded or excessive. We may make an administrative charge for this service in certain circumstances, which will not be larger than the cost to FATE to provide the requested information.

Right to Rectification

We aim to keep your personal data accurate and complete. We encourage you to contact us using the contact details provided below to let us know if any of your personal data is not accurate or if it changes, so that we can keep your personal data up-to-date. We will respond to any such requests within one month.

Right to Erasure

You have the right to request the deletion of your personal data where, for example, the personal data are no longer necessary for the purposes for which they were collected, where you withdraw your consent to processing, where there is no overriding legitimate interest for us to continue to process your personal data, or if your personal data has been unlawfully processed. If you would like to request that your personal data is erased, please contact us using the contact details provided below. We will respond to any such requests within one month.

Right to Object

In certain circumstances, you have the right to object to the processing of your personal data where, for example, your personal data is being processed on the basis of legitimate interests and there is no overriding legitimate interest for us to continue to process your personal data, or if your data is

being processed for direct marketing purposes. If you would like to object to the processing of your personal data, please contact us using the contact details provided below.

Right to Restrict Processing

In certain circumstances, you have the right to request that we restrict the further processing of your personal data. This right arises where, for example, you have contested the accuracy of the personal data we hold about you and we are verifying the information, you have objected to processing based on legitimate interests and we are considering whether there are any overriding legitimate interests, or the processing is unlawful and you elect that processing is restricted rather than deleted. Please contact us using the contact details provided below.

Right to Data Portability

In certain circumstances, you have the right to request that some of your personal data is provided to you, or to another data controller, in a commonly used, machine-readable format. This right arises where you have provided your personal data to us, the processing is based on consent or the performance of a contract, and processing is carried out by automated means. If you would like to request that your personal data is ported to you, please contact us using the contact details provided below.

Please note that the GDPR sets out exceptions to these rights. If we are unable to comply with your request due to an exception we will explain this to you in our response.

Contact

If you have any queries about this Policy, the way in which FATE process personal data, or about exercising any of your rights, please send an email to info@friends-at-the-end.org.uk or write to:

Chief Executive Officer
Friends at the End
Office 7, Unit 2
Kirkhill House Office Park
Glasgow
G77 5LL

Complaints

If you believe that your data protection rights may have been breached, and we have been unable to resolve your concern, you may lodge a complaint with the Information Commissioner's Office (ICO) www.ico.org.uk

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire

SK9 5AF

Changes to our Privacy Policy

Any changes we may make to this CPG privacy policy in the future will be posted on the page from which you downloaded this document and, where appropriate, notified to you by e-mail.

Version 1

Date: 01/10/2019