

# Privacy Notice

## North West Aberdeenshire CAB



North West Aberdeenshire CAB (also referred to as 'the Bureau', 'we', 'our', or 'us') is the Data Controller for any personal data we process about you for the purposes set out in this Privacy Notice. Our ICO registration number is Z9948805

This notice outlines what personal data the Bureau collects and processes about you when seeking advice and assistance from the Bureau. This notice does not cover personal data we process about our staff, workers, trustees, volunteers, supporters, or donors. Please read this notice carefully to understand how we process and look after your personal data.

The Bureau is a member of the Scottish Association of Citizens Advice Bureaux (NWACAB – operating name Citizens Advice Scotland), a network of 59 individual Citizens Advice Bureau. The Bureau uses a case management system called CASTLE. We are a [Joint Controller with Citizens Advice Scotland](#) (CAS) for the personal data held on this system.

### Our Data Processing

North West Aberdeenshire CAB is an independent Bureau that provides free, confidential, expert advice and assistance to help you resolve your problems. We deliver a holistic service and our data processing may vary depending on the support we are providing. We only use the personal data we need. Most personal data we process will have been provided by you during your discussions with our advisors. On occasion referrals are made to the Bureau from other organisations. They may share your personal data with us to help us provide you with advice and support. They should make you aware when this happens.

The Bureau processes personal data to keep records of the advice and support offered. This is to provide an effective and efficient service to you as well as for our insurance purposes. Personal data is any information that could be used to identify you. This may include:

- Name
- Address
- Email
- Phone number
- Financial data
- Criminal convictions data

You may also provide information such as your ethnicity, mental and physical health, political and philosophical beliefs, religion, trade union membership, genetics, sexual life or gender. This is called 'special category data' and we will only use this type of personal data where it is necessary for us to deliver services to you and where we are permitted by law.

If you do not want us to record and use your personal data, we can help you as best we can, but advice will be limited and general rather than specific to your circumstances.

The Bureau may also gather personal data for purposes such as research and advocacy, more information on our purposes for processing data can be found in Appendix 1.

### Lawful reasons we rely on to process your information

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances where:

- It is necessary for our legitimate interests to meet the aims of our organisation but respecting your interests and rights.
- You have given us your consent to process your personal data.
- Processing is necessary for us to perform a public task carried out in the public interest as set out in law.

When we process special category personal data, in addition to the above legal reasons we may process your special category data if:

- We have obtained your explicit consent
- There is a substantial public interest for us to do so

Please see the table below at Appendix 1 for further information on the lawful bases we may rely upon to process your personal data.

### **Withdrawing Consent**

If we rely upon your consent to process your personal data, you may request to withdraw consent at any time by contacting us at which point we shall stop processing your personal data in that way. Please note that this does not affect the legality of our processing up to the date of you tell us you want to withdraw I consent.

### **Sharing Your Personal Data**

We may need to share your persona data in the following situations:

- When you give us authority to work with organisations on your behalf
- To refer you to other supporting organisations
- If we need to share your information with other Bureaux
- With third party service providers delivering services for the Bureau (e.g. technology providers)
- With our professional advisors such as auditors, insurers, and leal professional
- With funders as part of research and advocacy work
- To meet our legal and regulatory obligations

If we do need to share personal data, we will have appropriate controls and processes in place through written contracts. Any data sharing will comply with data protection laws and where possible we will anonymise data prior to sharing it.

In exceptional circumstances where there is a high risk of harm to an individual, person-identifiable confidential information may be shared with third parties. We have strict Safeguarding procedures in place for when this may occur.

### **Transfers to third countries**

We may transfer personal information outside the UK.

Some of our third-party service providers may process personal data we give them outside of the UK. If it is necessary to transfer your personal data outside the UK, then we will put in place additional measures to protect your personal data to ensure it remains protected.

## Retention

We will not keep your personal data for any longer than we need it. All data will be securely disposed of once it is no longer needed.

Most client information is retained on our CASTLE system for 7 years, however under certain circumstances we are legally required to retain personal data for longer, for example if you have entered into a debt remedy your information is retained for up to 20 years. Calls recorded for monitoring purposes that are not linked to a case are deleted after 100 days. Voice transcription data may be deleted after 28 days however can be kept for 7 years along with transcribed information collected if in relation to your case.

## National Project Privacy Notices

We are involved in delivering national projects, these projects have their own privacy notices which explain how your personal data will be used if you receive support via the projects. These Privacy Notices are linked below:

[Patient Advice and Support Service \(PASS\)](#)

## Your Data Protection Rights

Under data protection law, [you have a number of rights which you can contact us to exercise. These are: rights when organisations process your personal information.](#)

- Right of access to the data we process about you
- Right to rectification of any data we process that may be incorrect
- Right to erasure of data we process about you
- Right to restrict processing of data we process about you
- Right to object to the Bureau processing your data
- Right to data portability
- Right not to be subject to automated decision-making and profiling

Your ability to exercise depend on our reason for processing your personal data. Please contact [manager@nwacab.org.uk](mailto:manager@nwacab.org.uk) if you wish to make a request:

## Data Controller Contact Details

If you have any questions or queries or wish to exercise your data rights you can contact the Bureau at [manager@nwacab.org.uk](mailto:manager@nwacab.org.uk) If you have queries regarding CASTLE, our case management system, you should contact the Bureau in the first instance, however your query may be passed to CAS as a Joint Controller of the system. You can find information on CAS's data processing on [the CAS Privacy Policy](#).

## Supervisory Authority Contact Details

You have the right to lodge a complaint to the Information Commissioner about the processing of your data. Their contact details are:

Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow Cheshire, SK9 5AF. Tel: 0303 123 1113. The website is at: <https://ico.org.uk>.

## **Changes**

We reserve the right to amend this privacy notice from time to time.

Last Updated: July 2024

## APPENDIX 1

**Personal Data** is collected in several different ways depending on your interaction with us. The table below sets out what personal data we process about you, where we get it from, why we use it, our legal basis and whom we share it with.

Purpose	Personal Data	Where do we get it from?	Legal Basis	Will we share it other than as set out above ?
To respond to enquiries (online and otherwise) and to provide or facilitate you with our service, advice and/or support.	Name, email address, any information you provide to us.	When you submit an enquiry on our website, use our online forms, Chatbot (virtual assistant), email, text, telephone, post or when we meet you face to face.	Legitimate Interest – it is in our legitimate interest to respond to enquiries, requests and information received to ensure we provide you with the relevant support.	
To provide you with CAS advice session communications by email or text.	Name, email and telephone number	From you	Legitimate Interest	
To meet the Scottish National Standard of Service	Name, email, telephone, address, and any other information you provide to us through the course of engaging with our	From you	Legitimate interest – we want to ensure we are providing you with the best advice, and maintaining accreditation in this standard is one of the ways we ensure this.  Substantial public interest	

	service, advice, or support.			
Images of you may be taken by CCTV systems when you have attended some of our premises, such as at door entry points, which are used by members of the public.	Camera footage	Through our CCTV devices on site	Legitimate Interest – it is in our legitimate interest to capture CCTV footage at our premises for security purposes	Only where required for the purposes of detecting or preventing crime.
To market our services, ideals or aims with a view to converting inquiries, send you our newsletters and similar updates, and marketing activity into donations for our Bureau.	Name, email address, telephone, address.	From you	Our legal basis is that it is in our legitimate interest to market our services, ideals or aims.  We may also rely on consent for certain marketing activity and where this is the case, we will obtain this from you separately.	No.
To take part in the CivTech challenges and/or improve or provide additional service benefits or solutions through technology developed via the <a href="#">CivTech challenge</a> .	Name, email address, information you provide to us through using our services, including data held within CAS's case management system.	From you	Our legitimate interests of improving our service and keeping it up to date with current technology in order to provide offer high quality advice and access to our help.	We may share this data with organisations that take part in the CivTech challenge and/or Citizen's Advice Bureaus for the purpose of improving our service and keeping it up to date with current technology

				in order to provide offer high quality advice and access to our help and for the purpose of taking part in the CivTech challenge
Research and advocacy	Aggregated data derived from datasets which include your personal data. This information is usually not capable of identifying you in this format.	From you	Legitimate interest	CAS and other partner organisations we may collaborate with for research purposes. The data we share will be anonymous.
To set cookies on our website.	Data about your use of our website.	From you	For essential cookies, it is in our legitimate interest to use these to operate the website.  For non-essential cookies, we rely on your consent.	Google Analytics.
To keep records of support provided to you	Data on our case management system.	From you and other bureaus	Our legal basis is that it is in our legitimate interest to manage our systems.	With CAS, who are a joint controller of your personal data held in our case management system.
To record and monitor calls	Call recordings	From you.	Our legal basis is that it is in our legitimate interest to ensure our calls are of good quality and public task to record calls where we are	We may share this data in limited circumstance where we need to defend a complaint and legal claim and in respect to the Help to Claim

			required to record calls relating to specific services, such as our Help to Claim service.	service, we may be required to share the information with partners we work with including Citizen's Advice Bureaus, Citizens Advice England and Wales and the Department for Work and Pensions.
Consent and responses for Customer Satisfaction Survey or any other surveys.	Name, email address, telephone, address.	From you.	Your consent.	No.
<p>To provide you with specific advice in relation to:</p> <ul style="list-style-type: none"> <li>• Welfare rights</li> <li>• Consumer matters</li> <li>• Money and Debt</li> <li>• Work and Employment</li> <li>• Housing and homelessness</li> <li>• Immigration</li> <li>• Health Services</li> </ul>	<p><b>Always:</b></p> <ul style="list-style-type: none"> <li>- Contact details</li> </ul> <p><b>May be processed depending on advice:</b></p> <ul style="list-style-type: none"> <li>- Financial circumstances</li> <li>- Family circumstances</li> <li>- Employment circumstances</li> <li>- Housing circumstances</li> </ul>	From you.	<p>We may rely on a number of lawful bases depending on the service we provide you:</p> <p>Our Article 6 lawful bases are:</p> <ul style="list-style-type: none"> <li>• Legitimate interest</li> <li>• Consent</li> <li>• Public task</li> </ul> <p>Our Article 9 lawful bases are:</p> <ul style="list-style-type: none"> <li>• Where processing is necessary to carry out a task in the public interest, for example</li> </ul>	<ul style="list-style-type: none"> <li>• When you give us authority to work with organisations on your behalf</li> <li>• When referring between support organisations</li> <li>• With members of the Scottish Association of Citizens Advice Bureaux (NWACAB)</li> <li>• With sub-processors delivering services for the Bureau (e.g. technology providers)</li> </ul>



	<ul style="list-style-type: none"><li>- Nationality information</li><li>- Health information</li><li>- Medical records</li><li>- Pension information</li><li>- Criminal victim information</li><li>- Criminal record information</li></ul>		<p>where we are providing a publicly funded service</p> <ul style="list-style-type: none"><li>• Explicit Consent</li></ul> <p>Please note that we will not always require your consent to process your personal data where another lawful basis applies.</p>	<ul style="list-style-type: none"><li>• With our insurers if you submit a complaint</li><li>• With funders as part of research and advocacy work</li></ul>
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