

## PRIVACY NOTICE OF CROWN ESTATE SCOTLAND

Crown Estate Scotland (Interim Management) (“Crown Estate Scotland”, “we”, “us”, “our”) is a public corporation created by The Crown Estate Scotland (Interim Management) Order 2017 and located at 6 Bells Brae, Edinburgh, EH4 3BJ. As a data controller under Data Protection Law, we are committed to protecting and respecting your privacy.

Crown Estate Scotland determines the purposes for which, and the means by which, personal data is processed. Personal data means any data that relates to a living individual who can be identified directly or indirectly from that data. It does not include data where the individual’s identity has been removed completely (anonymised data).

### **Purpose of this Privacy Notice**

This Privacy Notice tells you how we collect, process and look after your personal data that we collect when you register as a volunteer or undertake work experience with us and tells you about your privacy rights and how the law protects you.

It is important that you read this Privacy Notice, together with any other privacy notice we may provide on specific occasions when we are collecting or processing personal data about you, so that you are fully aware of how and why we are using your data. This Privacy Notice supplements other notices and is not intended to override them.

### **Data Protection Officer**

We have appointed a Data Protection Officer (DPO) who is responsible for overseeing questions in relation to this Privacy Notice. If you have any questions about this Privacy Notice, including any requests to exercise your legal rights under Data Protection Law, please contact the DPO using the details set out below:

Name: Helen Howden  
Email address: [dataprotection@crownestatescotland.com](mailto:dataprotection@crownestatescotland.com)  
Postal address: 6 Bells Brae, Edinburgh EH4 3BJ  
Telephone number: 0131 260 6070

### **Changes to the Privacy Notice and your duty to inform us of changes**

This version of our Privacy Notice was last updated on 12 March 2020. Historic versions can be obtained by contacting us at: [enquiries@crownestatescotland.com](mailto:enquiries@crownestatescotland.com). It is important that the personal data we hold about you is accurate and up to date. Please keep us informed if your personal data changes during your relationship with us.

### **Compliance with the data protection principles**

As a data controller, when we process personal data about you, we will comply with the data principles. These require that personal data be:

- processed lawfully, fairly and in a transparent way;
- used only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes;

- relevant to the purposes we have told you about and limited only to those purposes.;
- accurate and kept up to date;
- kept only as long as necessary for the purposes we have told you about; and
- in accordance with requirements of integrity and confidentiality

### **How we collect your personal data**

We collect and process personal data about you when you:

- request information from us;
- correspond with us by phone, email or otherwise;
- complete our volunteer information form;
- visit our website;
- provide feedback on our website or respond to a survey.

We may collect personal information in the course of volunteering activities throughout the period you volunteer for us, including the details of how you have helped us.

### **Personal Data we collect**

We collect the following categories of personal data:

- **Identity and contact data** e.g. name, username or similar identifier, email address, emergency contact details, photographs and other contact data.
- **Information on health or medical conditions which are relevant to the activity you are undertaking with us.** We treat this as special category data.
- **Profile Data** e.g. your interests, preferences and feedback.
- **Marketing and Communications Data** e.g. your preferences in receiving marketing from us and your communication preferences.

### **How we use special category personal data**

We will keep this extra information about you (such as details of emergency contacts or medical conditions) for legal or contractual reasons (including in the event of an insurance or legal claim), and for safeguarding purposes.

### **Purposes for which we will use your personal data**

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

- to carry out our obligations to you as a volunteer on the property we manage and to provide you with information and services that you request from us;
- to provide you with updates regarding news from Crown Estate Scotland and on any future volunteering opportunities with us;
- to analysis feedback or survey responses, with the aim of improving the services we provide;
- for our internal record keeping.

### **Legal basis for processing and retention period**

We will only use and store your information for as long as it is required for the purposes it was collected for. How long it will be stored for depends on the information in question,

what it is being used for and, sometimes, statutory legal requirements.

#### **Who do we share personal data with**

We may need to share some basic information about you with staff who will work with you as you volunteer with us. It is only shared with those who need to know the information for the purposes set out in this Privacy Notice, when they need to know it

We may use the photographs we take during your volunteering activity on our social media platforms and in marketing material. When completing the volunteering information form you will also have been asked to complete a photography consent form. We will only use photographs where you are identifiable if you have given us consent to do so.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We may need to share your personal data with third parties, including agents, where it is necessary for them to provide you with a service on our behalf. We will also disclose your personal information to third parties where we are under a duty to disclose your personal data to comply with any legal obligation, or to protect our rights, our property or our safety. If Crown Estate Scotland's functions were to be transferred to another body, or Crown Estate Scotland merged with another body, your personal data may also need to be transferred to that body.

We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

#### **Where do we store personal data**

The personal data we collect from you is stored securely and where stored electronically it is on information technology systems owned and operated by Crown Estate Scotland, or by verified third parties. Unfortunately, the transmission of information *via* the internet or email is not completely secure and, although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted over the internet to our site or by email; any transmission is at your own risk. Once we have received your information, we will use all appropriate procedures and security measures to try to prevent unauthorised access.

#### **Data Security**

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality. We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so. Crown Estate Scotland scans emails, using automated monitoring techniques, for malicious software and unsuitable material.

#### **Change of purpose**

We will only use your personal data for the purposes for which we collected it, unless we

reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which we consider allows us to do so. Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

### **Internal Transfers**

If we need to transfer your personal data out with the European Economic Area (“EEA”), we will always ensure that your rights and freedoms as a data subject are protected by being subject to the appropriate safeguards.

We use [MailChimp](#) as our marketing automation platform (for maintaining mailing lists and sending out updates to you). It is therefore necessary to transfer to MailChimp your email, first name and last name (if the latter are provided), for processing in accordance with MailChimp’s [Privacy Policy](#) and [Terms](#). MailChimp is covered by the *European Commission: EU-US Privacy Shield*.

### **Your rights in relation to your personal data**

Under certain circumstances, by law you have the right to:

- **Request access** to your personal data (commonly known as a “data subject access request”). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.
- **Request correction** of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected.
- **Request erasure** of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have exercised your right to object to processing (see below).
- **Object to processing** of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground. You also have the right to object where we are processing your personal data for direct marketing purposes.
- **Request the restriction of processing** of your personal data. This enables you to ask us to suspend the processing of personal data about you, for example if you want us to establish its accuracy or the reason for processing it.
- **Request the transfer** of your personal data to another party.
- **Request that a decision made using automated processing** of your personal data which significantly affect you, 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.
- **Withdraw your consent to our use of your personal data for a specific purpose**, at any time, where our use of your personal data for the purpose relies on consent as a legal condition for that use.

If you want to exercise any of these rights, please contact our Data Protection Officer at: [dataprotection@crownestatescotland.com](mailto:dataprotection@crownestatescotland.com).

### **No fee usually required**

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request for access is clearly unfounded or excessive. Alternatively, we may decline to comply with the request in such circumstances.

### **What we may need from you**

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is another appropriate security measure to ensure that personal data is not disclosed to any person who has no right to receive it.

Further information about your rights under Data Protection Law can be found at the website of the UK Information Commissioner's Office at <https://ico.org.uk/>.

## **COMPLAINTS**

If you have any concerns or complaints about the way we handle your personal data, you have a right to raise a complaint with the Information Commissioner's Office. Their website contains details of how to make a complaint: <https://ico.org.uk/>. However, we would welcome an opportunity to deal with the issue in the first instance, if you wish to contact us at: [dataprotection@crownestatescotland.com](mailto:dataprotection@crownestatescotland.com).