

Use of personal information by Clyde Gateway URC and Clyde Gateway Developments Limited

Who we are and how to contact us

Clyde Gateway URC is a company limited by guarantee (company registration number SC335599) and a Charity, registered with the Office of the Scottish Charity Regulator (reference number SC039644). Clyde Gateway URC has a trading subsidiary, Clyde Gateway Developments Limited, a company limited by shares (company registration number SC335662).

The registered office of both companies is located at Floor 2, The Olympia, 2-16 Orr Street, Glasgow G40 2QH United Kingdom. You can contact our Data Controller by post at this address, by email at: dataprotection@clydegateway.com, or by telephone on 0141 276 1573.

Why do we need your personal information and what do we do with it?

You may give us your personal information to allow us to keep you informed about services and programmes we provide which may be of interest to you, to provide a service or programme of activity to you, to allow us to take steps to enter into a contract with you or where necessary for compliance with a legal obligation to which Clyde Gateway URC or Clyde Gateway Developments Limited is subject. We may use your information to contact you by post, email or telephone and to maintain our records. We may hold your personal information on paper forms and on an electronic database. The electronic database is held on an encrypted computer system.

Legal basis for using your information

Processing your personal information is carried out under one of the following categories, where processing of your personal data is:

Necessary for the performance of a contract with you (or to take steps to enter into a contract with you), or

Necessary for compliance with a legal obligation to which Clyde Gateway URC or Clyde Gateway Developments Limited is subject, or

On the basis of your consent, or

Necessary to protect vital interests of you or another person.

Where we collect data from you on the basis of your consent you will be given a Privacy Statement at the time of your consent which sets out how we will use your personal data.

Sensitive Personal Information

We may also need to process more sensitive personal information about you under one of the following legal bases:

Explicit consent: We may process more sensitive personal information about you on the basis that you have given us your explicit consent for this.

Employment: We may need to process more sensitive personal information about you in order to meet our legal obligations in relation to employment. This would include, for example, information related to health or maternity.

Vital interests: We may need to process more sensitive personal information about you in order to protect your vital interests in circumstances where we will not be able to seek your consent.

Establishing/defending legal claims: We may need to process more sensitive personal information about you where this is necessary for the establishment, exercise or defence of legal claims.

Who do we share your information with?

We are legally obliged to safeguard public funds so we are required to verify and check your details internally for fraud prevention. We may share this information with other public bodies for the same purpose. We are also legally obliged to share certain data with other public bodies, such as HMRC and will do so where the law requires this. If you are employee of Clyde Gateway your information will be shared with our payroll service provider and with the Strathclyde Pension Fund should you remain opted into the pension scheme. We will also generally comply with requests for specific information from other regulatory and law enforcement bodies where this is necessary and appropriate. We do not share your personal data with any other organisation unless specifically

stated in any agreement or contract we may enter into with you. Should this be the case a separate statement will be issued to you advising of the nature of the data shared and who we share it with.

How long do we keep your information for?

We only keep your personal information for the minimum period amount of time necessary. Sometimes this time period is set out in the law, but in most cases it is based on the business need. Personal data held on the basis of your consent will be held for a period of three years from the date of your consent to use your data, or until you withdraw consent, whichever is the earlier.

Personal data for current employees is retained in line with HMRC requirements. Personnel files for former employees are retained for one year following the leave date. Thereafter, to assist with reference requests, personal data for former employees is limited to a note of employee name, employment start and end date, job title and salary levels during employment.

Your rights under data protection law

You have the following rights under data protection law.

- Access to your information – you have the right to request a copy of the personal information that we hold about you.
- Correcting your information – we want to make sure that your personal information is accurate, complete and up to date. Therefore you may ask us to correct any personal information about you that you believe does not meet these standards.
- Deletion of your information – you have the right to ask us to delete personal information about you where
 - (i) you think that we no longer need to hold the information for the purposes for which it was originally obtained
 - (ii) we are using that information with your consent and you have withdrawn your consent – see **Withdrawing consent to using your information** below
 - (iii) you have a genuine objection to our use of your personal information – see **Objecting to how we may use your information** below
 - (iv) our use of your personal information is contrary to law or our other legal obligations.

Restricting how we may use your information – in some cases, you may ask us to restrict how we use your personal information. This right might apply, for example, where we are checking the accuracy of personal information that we hold about you or we are assessing the objection you have made to our use of your information. This right might also apply if we no longer have a basis for using your personal information but you don't want us to delete the data. Where this right is realistically applied will mean that we may only use the relevant personal information with your consent, for legal claims or where there are other public interest grounds to do so.

Withdrawing consent to use your information – Where we use your personal information with your consent you may withdraw that consent at any time and we will stop using your personal information for the purpose(s) for which consent was given.

Objecting to how we may use your information – You have the right at any time to tell us to stop using your personal information for direct marketing purposes.

Please contact us as stated above if you wish to exercise any of these rights.

Complaints

We aim to directly resolve all complaints about how we handle personal information. However, you also have the right to lodge a complaint with the Information Commissioner's Office, who can be contacted by post at: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF. By phone on 0303 123 1113 (local rate) or 01625 545 745. Visit their website for more information at- <https://ico.org.uk/concerns>.