

# Privacy Statement: SHAAP

## Overview

Scottish Health Action on Alcohol Problems (SHAAP) is committed to protecting your personal information and being transparent about any information we hold about you.

This Privacy Statement explains how we collect and use the information we receive from you.

## The lawful basis for obtaining and using your data

Article 6 of the EU GDPR Regulations concerns the “Lawfulness of Processing” and the following three definitions provide SHAAP’s legal bases for processing data in relation to SHAAP:

6(1) (a) – Consent of the data subject	Any other personal data we collect based on consent will only be used for the stated purpose and will not be shared with third parties.
6(1) (b) – Processing is necessary for the performance of a contract with the data subject or to take steps to enter into a contract	When you sign up to our mailing list or agree to be kept updated about our events and services you are entering into a servicing contract with us. In order to perform this contract, we need to process and store your data. For example, we may need to contact you by email to verify your information.
6(1) (f) – Necessary for the purposes of legitimate interests pursued by the controller or a third party, except where such interests are overridden by the interests, rights or freedoms of the data subject	By providing your time to attend our events, read our literature and contribute to the issues we focus on, you are helping deliver the objectives of SHAAP and ultimately contribute to improvements in the health of the people of Scotland and elsewhere. Our legitimate interests are to deliver the administration of this service efficiently and to a high standard and in so doing this we may collect and process additional personal information. We will also process personal data to further improve the SHAAP administration services we provide. We will only do this if there is no overriding prejudice to you by using your personal information in this way.

## The data we collect

We do not collect more information than we need to fulfil our stated purposes and will not retain it for longer than is necessary.

The information we ask for is used to maintain up-to-date contact details for you.

The information we will process includes:

- Full name
- Email address
- Location (*optional*)
- Job title (*optional*)
- Organisation (*optional*)
- Sector(s) (*optional*)

## What we do with your data

We aim to communicate with you about the work that we do in ways that you find relevant, timely and respectful. To do this, we use data that we have stored about you, such as your professional interest, the events you have registered for in the recent past, as well as any preferences you may have told us about.

We use 'legitimate interest' as the legal basis for promotional communications by email.

In the case of email, we will give you an opportunity to opt-out of receiving SHAAP mailings, or to choose which you would like to receive through setting your SHAAP email communication preferences. You can alternatively use the contact details at the end of this policy to request changes to the way we stay in touch by email.

In addition to promotional communications, we also process personal information in the following ways that are within our legitimate organisational interests:

- We may analyse data we hold about you to ensure that the content and timing of communications we send you are as relevant to you as possible.
- In order to improve our website, we may analyse information about how you use it and the content and ads that you interact with. You may also see promotions from us on social media that are tailored to your interests.
- We may analyse data we hold about you in order to identify and prevent fraud.

## When we share your data

Other than where SHAAP has a legal obligation, data will not be shared with any external third party unless SHAAP has your express consent to do so.

We may be required to share your data with our own service providers who process data on our behalf and on our instructions, such as with providers of print services or postal mailing services. In these cases, we make every effort to ensure that these third parties comply strictly with our instructions and with relevant data protection laws.

## How long we keep your data

We store your personal information for a minimum of 18 months after you have provided it to us through our mailing list or request to attend one of our events. We will take steps to keep our mailing lists updated and provide straightforward methods to be removed from these lists.

## Website cookies

The SHAAP website uses cookies to monitor browsing preferences. We do not provide any warranty or guarantee as to the accuracy, timeliness, performance, completeness or suitability of the information and materials found or offered on this website for any particular purpose. You acknowledge that such information and materials may contain inaccuracies or errors and we expressly exclude liability for any such inaccuracies or errors to the fullest extent permitted by law.

## How we use cookies

A cookie is a small file which asks permission to be placed into the memory or storage area of the device you are using when browsing a website. The cookie helps analyse web traffic or lets you know when you visit a particular site. Cookies allow web applications to respond to you as an individual, allowing modern websites to provide a more personalised experience.

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We use cookies for these purposes and use logged site usage data for anonymised statistical website usage analysis.

Overall, cookies help us provide you with a better website. A cookie in no way gives us access to your computer or any information about you, other than the data you choose to share with us.

You can choose to accept or decline cookies. Most web browsers automatically accept cookies, but you can usually modify your browser settings to decline cookies, if you prefer. This may prevent you from taking full advantage of the website.

We use the following cookies:

Cookie	Description	Duration	Type
95508d54fd3e67343e598c5f8a9968b8	This is a session cookie and is required for the site to operate. It is used to track a user through the site and ensure that if they are logged in then they will remain logged in.	-	Performance
VISITOR_INFO1_LIVE	This cookie is set by YouTube and is used to track the information of the embedded YouTube videos on a website.	5 months	Advertisement
GPS	This cookie is set by YouTube and registers a unique ID for tracking users based on their geographical location.	30 minutes	Analytics
YSC	This cookie is set by YouTube and is used to track the views of embedded videos.		Performance
__utma	This cookie is set by Google Analytics and is used to distinguish users and sessions. The cookie is created when the JavaScript library executes and there are no existing __utma cookies. The cookie is updated every time data is sent to Google Analytics.	2 years	Performance
__utmc	The cookie is set by Google Analytics and is deleted when the user closes the browser. The cookie is not used by ga.js. The cookie is used to enable interoperability with urchin.js which is an older version of Google Analytics and used in conjunction with the __utmb cookie to determine new sessions/visits.		Performance
__utmz	This cookie is set by Google Analytics and is used to store the traffic source or campaign through which the visitor reached your site.	6 months	Performance

__utmt	The cookie is set by Google Analytics and is used to throttle request rate.	10 minutes	Performance
__utmb	Used to determine new sessions/visits. The cookie is created when the JavaScript library executes and no existing __utmb cookies exists. The cookie is updated every time data is sent to Google Analytics.	30 minutes	Performance
IDE	Used by Google DoubleClick and stores information about how the user uses the website and any other advertisement before visiting the website. This is used to present users with ads that are relevant to them according to the user profile.	1 year	Advertisement

## How you can access your data

To make a request for any personal information we may hold, you should contact the SHAAP administrator on +44 (0) 131 247 3667 or email [shaap@rcpe.ac.uk](mailto:shaap@rcpe.ac.uk).

You can find out which personal information we hold by making a 'subject access request' under the GDPR. Where we hold information about you we will:

- Give you a description of it.
- Tell you why we are holding it.
- Tell you who it could be disclosed to.
- Provide you with a copy of the information in a suitable format within 30 days.

If you agree, we will try to deal with your request informally, for example by providing you with the specific information you need over the telephone.

## Other Rights

If we do hold personal data about you, you can:

- Request that incorrect data is amended.
- Ask for data to be erased where there is no longer an ongoing need for processing.
- Specify that access to your data be restricted.
- Request that any objection you have to the processing of your personal data is considered.
- Ask not to be contacted as part of any fundraising activities.

If you wish to exercise any of these rights, please contact the SHAAP administrator (details above) or you can contact the RCPE/SHAAP Data Protection Officer on +44 (0) 131 247 3600 or email [dpo@rcpe.ac.uk](mailto:dpo@rcpe.ac.uk).

## Making a complaint

SHAAP greatly values the working relationship it has with the many individuals and organisations we work with and aims to resolve any issues relating to data protection informally, efficiently and amicably. We will respond quickly to any requests to change your preferences, correct errors with the data we hold, provide access to your data or, if necessary, erase your data.

If any matter cannot be resolved by us then you may wish to discuss the issue further with the ICO in the UK or the relevant regulatory authority within your region.