

PRIVACY POLICY



Who we are:

Scran Academy SCIO is a catering social enterprise on a mission to see every young person, regardless of background or barrier, realise their full potential in learning, work and life. Too many young people in our most challenged communities never realise their talents or aspirations due to the effects of social inequity and poverty.

Our commitment:

Scran Academy SCIO is committed to protecting and respecting your privacy. Scran Academy SCIO recognises its obligation to handle personal data it collects and uses in accordance with data protection legislation and best data protection practices. This means that your personal information will be:

1. Processed lawfully, fairly, and in a transparent manner.
2. Collected for specified, explicit and legitimate purposes.
3. Only collected so far as required for our lawful purposes.
4. As accurate and up to date as possible.
5. Retained for up to seven years, in accordance with retention policies.
6. Processed in a manner which ensures an appropriate level of security.

Any questions regarding this policy and our privacy practices should be sent by email to hello@scranacademy.com.

Why does Scran Academy SCIO need to process personal information?

We support and work with organisations across Scotland to help achieve social benefit. We need to process data from a wide range of stakeholders including charities, funders, individuals, suppliers and other partners to carry out our job and achieve our aims.

How we collect information from you:

You directly provide Scran Academy SCIO with the data we collect. We collect data and process data when you:

- Become a member of Scran Academy.
- Become an employee of Scran Academy.
- Register online or place an order for any of our products or services via the website.
- Complete forms physically or via the website.
- Sign up to be a member of our website.
- Voluntarily complete a customer survey or provide feedback via email.
- Use or view our website via your browser's cookies.
- Email and written correspondence.
- Telephone conversations.
- Visitors to our website.

- Conferences & events.
- Make a referral to our services.
- Participate in our services.

Types of information we collect from you and how we use it:

We collect data from many different groups of people to help us do our job. Data we commonly collect from you and why:

If you work with an organisation we partner with

- We will collect details such as your name, work address, phone number & email address.
- We will only collect data which is necessary for us to do our job and where we have a legitimate interest in doing this. This might be for activities like sending you updates & reports on our work together, or to arrange training or learning events.
- We might see your details as part of case studies to highlight the work you do. This could also include photos or videos; however, we will always ask for permission to do this.
- Your details may be stored on our third-party CRM database.

If you use our services

- We will collect details such as your name, address, phone number, email address, school or referral partners, age and date of birth.
- We will only collect data which is necessary for us to do our job and where we have a legitimate interest in doing this. This might be for activities like sending you updates & reports on our work together, or to arrange training or learning events.
- If you are completing an SQA qualification with us then all the work you provide as evidence will be stored, along with your student number.
- We may seek to use case studies/photos/videos to highlight the work we do, but we will always ask for permission to use them from you.
- Your details will be stored on paper files and using our third party CRM database.

If you are an individual/organisation who funds Scran Academy SCIO:

- We will collect details such as your name, address, phone number, email address.
- We will keep records of your donations to Scran Academy SCIO, but we will never disclose this information without your consent.
- Your details will be stored on paper files and using our third party CRM database.

- We will use your details to send you updates & reports on our work together. This may be by post or by email (but only if, where appropriate, we have your consent to email you)

If you have donated to Scran Academy SCIO using our website/QR code donate function

- We will collect details such as your name, address, phone number, email address and credit or debit card details.
- Your details, including payment information, will be stored securely on our website host servers and the server of our payment processing partner Stripe. Your name, address, phone number and email address will also be stored on our third-party CRM database.
- We will keep records of your donations to Scran Academy SCIO, but we will never disclose this information without your consent.

If you are a potential investor in Scran Academy SCIO

- We will collect details such as your name, address, phone number, email address and your interests.
- We will use these details for administrative purposes only and will not share them with third parties.
- Your details will be stored using our third party CRM database.
- We may send you updates and news about Scran Academy SCIO by email, (but only if, where appropriate, we have your consent to email you)

If you are another interested party or stakeholder

- We may collect details such as your name, address, phone number, email address.
- We might collect your details through events you attend or contacts you make with our staff and where we feel we have a legitimate interest in doing so. This might include instances where you have shared your business card or details with one of our staff.
- Your details will be stored using our own servers and third party CRM database.
- We will use your details to send you updates and news about Scran Academy SCIO, (but only if, where appropriate, we have your consent to email you)

If you have completed an enquiry form on the Scran Academy SCIO website

- We will collect your name, email address & phone number.
- We will use this information to contact you about your enquiry.
- Your details will be stored on our website host servers, where they will be stored for 3 months. They may also be stored on our internal systems if necessary as part of your enquiry.

- We will not use your details for any other purpose unless agreed with you during any follow-up discussions.
- We will not share your details with anyone unless agreed with you during any follow-up discussions.
- We will not enter your details on any marketing databases.

If you have ordered a product on the Scran Academy SCIO website

- We will collect your name, email address, phone number, address and credit or debt card details
- We will use this information to contact you about your enquiry and/or process the payment.
- Your details, including payment information, will be stored securely on our website host servers and the server of our payment processing partner Stripe
- Your details will be stored on our website host servers, where they will be stored for 3 months. They may also be stored on our internal systems if necessary as part of your enquiry.
- We will not use your details for any other purpose unless agreed with you during any follow-up discussions.
- We will not share your details with anyone unless agreed with you during any follow-up discussions.
- We will not enter your details on any marketing databases.

Recording of meetings

Meetings held online between Scran Academy SCIO, other charities and relevant stakeholders and service user will be held via online platforms such as Microsoft Teams and Zoom.

In some instances, it might be useful to have a recording of these meetings, for example for the benefit of people who could not attend.

Recordings may be used by Scran Academy SCIO to help inform minutes of the meeting where relevant. Recordings will be shared with invitees only.

Scran Academy SCIO recognises its responsibility in terms of data privacy and GDPR and that some participants may not wish to be heard on a meeting recording. In that respect, all participants will be advised at the start that it will be recorded. If any individual objects, they will be offered the option of 1) No recording at all, or 2) That person(s) may consent to the recording on the basis they contribute via the meeting chat thread rather than speaking.

The chat function will in all cases be regarded as a part of the meeting, and notes from this may be used to further our project development or as a part of the meeting minute.

The meeting host will remind participants of the above at the outset of the meeting.

Any data retained from meetings, including recordings and minutes, will be securely stored on our password protected servers and treated as confidential, unless otherwise agreed.

What is our lawful basis for processing personal information?

It is within Scran Academy SCIO's legitimate interest to process data in order to do their job.

Legitimate interest

When using legitimate interest as a lawful reason for processing data, Scran Academy SCIO will ensure that:

- The legitimate interests are those of Scran Academy SCIO, or the interests of third parties. Legitimate interests might include commercial interests, individual interests or broader societal benefits.
- The processing is necessary and cannot be achieved in another less intrusive way.
- The interests of Scran Academy SCIO are fairly balanced against those of individuals concerned, the individual would reasonably expect the processing, and processing would not cause unjustified harm to the individual.

Examples of when we might use legitimate interest as a lawful reason for processing can include, but are not limited to:

- Processing details of investors to Scran Academy SCIO
- Arranging conferences/events/training
- Follow up to meetings you may have had with our colleague

Consent

In some cases, we will require consent to use your data. Common scenarios where we would seek this include:

- To send you updates/reports/newsletters by email
- If you are a service user and we are publishing a case study about you
- If you are a service user and we would like to use a photo or video of you in a publication or website.

There may be other instances where consent is needed, but we will always contact you to do this.

Marketing:

Scran Academy SCIO would like to send you information about products and services of ours that we think you might like.

If you have agreed to receive marketing, you may always opt out at a later date.

You have the right at any time to stop Scran Academy SCIO from contacting you for marketing purposes.

If you no longer wish to be contacted for marketing purposes, please contact hello@scranacademy.com

How long do we keep your data for?

Scran Academy SCIO will keep your data for up to seven years. It is kept this long as we consider our young people and families to be part of the Scran family therefore if they want to return to us they can do easily. Once this time period has expired, we will delete your data from our database and shred any physical records/copies.

Where does Scran Academy Store Personal information

Scran Academy SCIO securely stores your data on our secure online database and/or in locked filing cabinets in our office at 1 Lochside View, EH12 9DH. We access our secure online database remotely across our work sites, including at Scran Café at the Comely Bank Centre, EH4 2LD.

Staff may record details in notebooks and on their workplace phones. All staff undergo training in privacy and data protection, ensuring no confidentiality is compromised.

Who has access to your information?

Your information is securely stored and only accessible by staff members as deemed appropriate to your relationship with us.

In some circumstances your details may be stored on third party software platforms where Scran Academy SCIO ensures that suitable data security is in place.

In some circumstances we will need to share service users data with their schools, due to the referral partnership in place.

Scran Academy SCIO will never sell or rent your information to third parties.

Your rights**What are your data protection rights?**

Scran Academy SCIO would like to make sure you are fully aware of all of your data protection rights. Every user is entitled to the following:

The right to access – You have the right to request Scran Academy SCIO for copies of your personal data.

The right to rectification – You have the right to request that Scran Academy SCIO correct any information you believe is inaccurate. You also have the right to request Scran Academy SCIO to complete information you believe is incomplete.

The right to erasure – You have the right to request that Scran Academy SCIO erase your personal data, under certain conditions.

The right to restrict processing – You have the right to request that Scran Academy SCIO restrict the processing of your personal data, under certain conditions.

The right to object to processing – You have the right to object to Scran Academy SCIO's processing of your personal data, under certain conditions.

The right to data portability – You have the right to request that Scran Academy SCIO transfer the data that we have collected to another organisation, or directly to you, under certain conditions.

If you make a request, we have one month to respond to you. If you would like to exercise any of these rights, please contact us at hello@scranacademy.com

Use of 'cookies'

What are cookies?

Cookies are text files placed on your computer to collect standard Internet log information and visitor behaviour information. When you visit our website, we may collect information from you automatically through cookies or similar technology.

For further information, visit allaboutcookies.org

How do we use cookies?

Scran Academy SCIO uses cookies in a range of ways to improve your experience on our website, including:

- Keeping you signed in
- Understanding how you use our website

What types of cookies do we use?

There are a number of different types of cookies, however, our website uses:

- **Functionality** – Scran Academy SCIO uses these cookies so that we recognise you on our website and remember your previously selected preferences. These could include what language you prefer and location you are in. A mix of first-party and third-party cookies are used.

How to manage cookies

You can set your browser not to accept cookies, and the above website tells you how to remove cookies from your browser. However, in a few cases some of our website features may not function as a result.

Links to other websites

The Scran Academy SCIO website contains links to other websites. Our privacy policy applies only to our website, so if you click on a link to another website, you should read their privacy policy.

16 or Under

We are concerned to protect the privacy of children aged 16 or under. If you are aged 16 or under, please get your parent/guardian's permission beforehand whenever you provide us with personal information

Changes to our privacy policy

Scran Academy SCIO keeps its privacy policy under regular review and places any updates on this web page. This privacy policy was last updated on 4 May 2020.

Contact Information

How to contact us

If you have any questions about Scran Academy SCIO's privacy policy, the data we hold on you, or you would like to exercise one of your data protection rights, please do not hesitate to contact us.

Email us at: hello@scranacademy.com

How to contact the appropriate authority

Should you wish to report a complaint or if you feel that Scran Academy SCIO has not addressed your concern in a satisfactory manner, you may contact the Information Commissioner's Office.

Email: scotland@ico.org.uk

Phone: 0303 123 1115

Address: The Information Commissioner's Office – Scotland
45 Melville Street,
Edinburgh,
EH3 7HL