﻿

# Smile Scotland SCIO Privacy Notice

This privacy notice tells you what to expect us to do with your personal information.

* [Contact details](#contact)
* [What information we collect, use, and why](#collect)
* [Lawful bases and data protection rights](#lawful)
* [Where we get personal information from](#infofrom)
* [How long we keep information](#retention)
* [Who we share information with](#share)
* [How to complain](#complain)

## Contact details

### Post: Smile Scotland Auction House, Ryehill, Oyne, INSCH, Aberdeenshire, AB52 6QS, GB

### Telephone: 01464851638

### Email: angela@smilescotland.org.uk

## What information we collect, use, and why

We collect or use the following information to **provide services and goods, including delivery and third party referrals**:

* Names and contact details
* Pronoun preferences
* Addresses
* Date of birth
* Emergency contact details
* Next of kin details
* Service use history
* Records of meetings and decisions
* Payment details (including card or bank information for transfers and direct debits)
* Information relating to compliments or complaints

We collect or use the following personal information for **service updates or marketing purposes**:

* Names and contact details
* Addresses
* Marketing preferences
* Purchase history
* Records of consent, where appropriate

## Lawful bases and data protection rights

Under UK data protection law, we must have a “lawful basis” for collecting and using your personal information. There is a list of possible lawful bases in the UK GDPR. You can find out more about lawful bases on the ICO’s website.

Which lawful basis we rely on may affect your data protection rights which are in brief set out below. You can find out more about your data protection rights and the exemptions which may apply on the ICO’s website:

* **Your right of access** - You have the right to ask us for copies of your personal information. You can request other information such as details about where we get personal information from and who we share personal information with. There are some exemptions which means you may not receive all the information you ask for. [You can read more about this right here](https://ico.org.uk/for-organisations/advice-for-small-organisations/create-your-own-privacy-notice/your-data-protection-rights/#roa).
* **Your right to rectification** - You have the right to ask us to correct or delete personal information you think is inaccurate or incomplete. [You can read more about this right here](https://ico.org.uk/for-organisations/advice-for-small-organisations/create-your-own-privacy-notice/your-data-protection-rights/#rtr).
* **Your right to erasure** - You have the right to ask us to delete your personal information. [You can read more about this right here](https://ico.org.uk/for-organisations/advice-for-small-organisations/create-your-own-privacy-notice/your-data-protection-rights/#rte).
* **Your right to restriction of processing** - You have the right to ask us to limit how we can use your personal information. [You can read more about this right here](https://ico.org.uk/for-organisations/advice-for-small-organisations/create-your-own-privacy-notice/your-data-protection-rights/#rtrop).
* **Your right to object to processing** - You have the right to object to the processing of your personal data. [You can read more about this right here](https://ico.org.uk/for-organisations/advice-for-small-organisations/create-your-own-privacy-notice/your-data-protection-rights/#rto).
* **Your right to data portability** - You have the right to ask that we transfer the personal information you gave us to another organisation, or to you. [You can read more about this right here](https://ico.org.uk/for-organisations/advice-for-small-organisations/create-your-own-privacy-notice/your-data-protection-rights/#rtdp).
* **Your right to withdraw consent** – When we use consent as our lawful basis you have the right to withdraw your consent at any time. [You can read more about this right here](https://ico.org.uk/for-organisations/advice-for-small-organisations/create-your-own-privacy-notice/your-data-protection-rights/#rtwc).

If you make a request, we must respond to you without undue delay and in any event within one month.

To make a data protection rights request, please contact us using the contact details at the top of this privacy notice.

### Our lawful bases for the collection and use of your data

Our lawful bases for collecting or using personal information to **provide services and goods, including delivery and third party referrals** are:

* Consent - we have permission from you after we gave you all the relevant information. All of your data protection rights may apply, except the right to object. To be clear, you do have the right to withdraw your consent at any time.
* Contract – we have to collect or use the information so we can enter into or carry out a contract with you. All of your data protection rights may apply except the right to object.

Our lawful bases for collecting or using personal information for **service updates or marketing purposes** are:

* Consent - we have permission from you after we gave you all the relevant information. All of your data protection rights may apply, except the right to object. To be clear, you do have the right to withdraw your consent at any time.
* • Legitimate interests – we’re collecting or using your information because it benefits you, our organisation or someone else, without causing an undue risk of harm to anyone. All of your data protection rights may apply, except the right to portability. Our legitimate interests are:
	+ We email customers about the upcoming auctions and other charity events relating to Smile Scotland only.

## Where we get personal information from

* Directly from you
* Other health and care providers
* Social services
* None

## How long we keep information

We keep your information for 12 months after your last activity.

## Who we share information with

### Data processors

**EM Bookkeeping**

This data processor does the following activities for us: They process our payroll information.

**Easy live Auctions**

This data processor does the following activities for us: They manage our IT system back office and auction interface.

We have a joint controller relationship with Easy live Auctions. We process your personal information with that joint controller for the following reason: Smile Scotland and Easy Live Auctions process name, address, phone number, email address and bank card details to enable customers to bid for items through our auction and to enable us to take payments and post purchased items. The Easy Live Auctions provides the platform and back office.

### Others we share personal information with

* Organisations we’re legally obliged to share personal information with
* Third parties: Postal delivery services, in order to send goods that customers have purchased.

## How to complain

If you have any concerns about our use of your personal data, you can make a complaint to us using the contact details at the top of this privacy notice.

If you remain unhappy with how we’ve used your data after raising a complaint with us, you can also complain to the ICO.

The ICO’s address:

Information Commissioner’s Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

Helpline number: 0303 123 1113

Website: [https://www.ico.org.uk/make-a-complaint](https://ico.org.uk/make-a-complaint/)

## Last updated

23 September 2024