

## Privacy notice

Our privacy notice will give you information on how Scottish Enterprise collects, uses, shares and looks after your personal information.

### Your personal information

#### Who we are

Scottish Enterprise (SE) is Scotland's national economic development agency and a non-departmental public body of the Scottish Government. We have our headquarters at Atrium Court, 50 Waterloo Street, Glasgow G2 6HQ, United Kingdom, and operate our business from locations within Scotland and worldwide.

The privacy notice applies when you visit our website, provide any personal information through this website, when we provide services to you or when you have asked to receive marketing from us (regardless of where you are located). It also applies where you are a supplier to us. The privacy notice will also tell you about your privacy rights and how the law protects you.

#### Letting us know about changes to your personal information

It is important that the personal information that we hold about you is accurate and current. Please let us know if your personal information changes during your relationship with us by contacting us.

#### [Contact us](#)

Personal information, or personal data, means any information about an individual from which that person can be identified. Anything we do with your personal information (from the point at which we collect it until we delete it from our systems) is called processing.

#### Further information

This website is not intended for children and we do not knowingly collect data relating to children.

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

#### Changes to our privacy notice

This is the current version of our privacy notice. It was last updated on 30 April 2019.

## Collecting and sharing your data

### Personal information we collect

We may collect, use, store and share different kinds of personal information about you. To help you identify these, they have been grouped together as follows:

<b>Group data</b>	<b>Personal information includes</b>
-------------------	--------------------------------------

Identity data	Name, signature, date of birth, job role, passport details, contracts of employment, agreements/consultancy/seconded contracts
Contact data	Email address, phone number, address, social media contacts.
Claims data	Personal information that is evidence of a claim, for example: timesheets, salary information, receipts received, payslips.
Due diligence data	Information about past and present business affiliations, appointments, associations relevant to, or associated with, you.
Financial data	Bank account, payment card details, company national insurance number
Transaction data	Details of payments to and from you; payments you may have received from us
Technical data	Internet protocol (IP) address, your location, time zone setting and location, browser, operating system and platform and other information used to access this website
Profile data	Username and password, your preferences
Usage data	Information about how you use our website
Marketing data	Your preferences in receiving marketing from us and selected third parties. You can learn more about how we use your information to share your information with page.
Special category data	Race or ethnicity, religious or philosophical beliefs, sexual orientation, political opinions, trade union membership, your health and genetic and biometric information, criminal convictions and offences.

There is also other information that we collect, use, store and share that is not personal information, including the following areas.

#### **Aggregated data**

Aggregated data, such as statistical or demographic data for any purpose. Aggregated data may be derived from your personal information but is not considered personal information in law as this data does not directly or indirectly reveal your identity. For example, we may aggregate your usage data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect aggregated data with your personal information so that it can directly or indirectly identify you, we treat the combined data as personal information, which will be used in accordance with this privacy notice.

### **Anonymised data**

Anonymised data is the process of turning personal information into a form which does not identify individuals and where identification is not likely to take place.

### **Company data**

Company data is any information relating to a company, such as the company's address, financial information, business plans (although these may contain elements of personal information), methodologies, project briefs etc.

### **How we collect personal information**

We collect personal information using different types of methods and sources. We have grouped these together in the following ways.

#### **Direct interactions**

We collect personal information directly from you. For example, when you use our website, apply for our products and services for you or on behalf of your company or employer, create and account on our website or MyBusinessID account space, request marketing to be sent to you, complete a survey or provide feedback, or you are a GlobalScot, non-executive director of one of our portfolio companies or a panel member involved in evaluating applications.

#### **Employer or company**

We collect personal information from your employer or a company you work with. For example, if your personal information is included as part of the application for funding or support, or in a bid to supply services to us; or as evidence in support of a claim for grant funding.

#### **Public sector partners**

We would have your personal information if you or your company has engaged with our public sector partners and as part of the public sector partner's and our public functions, they have shared your personal information with us. You can find out more about our public sector partners on the **Who we will share your information with** tab.

#### **Customer relationship management (CRM) partners**

We would have your personal information where any of our partners to the CRM partnership have input your details to the shared customer relationship management system. You can [read more about the CRM Partnership](#).

#### **Third party sources/publicly available sources**

We may receive personal information about you from various third party sources. This may include where we have subscribed to a database, or have been provided with information from an

interested third party, such as an investor. It may also come from a publicly available source (e.g. Companies House) or is available through social media (e.g. LinkedIn).

### **Databases and services we use**

Scottish Enterprise subscribes to the following databases and services:

- Beauhurst
- Bureau Van Dijk - FAME, Orbis & Mint
- Costar
- Delta-ee
- Econsultancy
- Equifax
- Euromonitor Passport
- ExportSavvy
- fDI Benchmarks and Markets
- FPAL (First Point Access Limited)
- Frost & Sullivan
- GlobalData Pharma & Energy
- IBIS World
- IBISWorld International & UK
- IGD Retail Analysis
- Informa - Scrip Intelligence, Datamonitor Healthcare and Medtrack
- International Trade Portal - Bank of Scotland
- Kompass
- Kroll
- Lexis Nexis News
- LinkedIn Premium
- Marketline
- MEED
- Mintel - UK
- MyBusinessID
- Newsbase
- Pitchbook

## **Suppliers**

Any supplier we have procured to deliver a service on our behalf. Such suppliers will be under contractual obligations to process your personal information in compliance with data protection laws.

## **Who we will share your information with**

Scottish Enterprise (SE) will share your personal information with our CRM Partners, as part of the overall CRM Partnership collaboration. We may also share your personal information with our Public Sector Partners and our suppliers to enable them to do any of these things for or in collaboration with SE, or where we are required to do so to meet our legal obligations to the Scottish Government and/or the European Commission.

Where required to do so by law, we may also share your information with law enforcement agencies.

Where we share your personal information with our Public Sector Partners, this will be done in accordance with the data sharing arrangements that we have with them. Personal information will be shared with the CRM Partnership and our Public Sector Partners on the basis that either:

- We have jointly determined the purpose and means of processing (joint controllers)
- We process the same personal information but for different purposes (controllers in common)

## **Our public sector partners**

- Accounts Commission
- Audit Scotland
- Department for Business Energy and Industrial Strategy (BEIS)
- Biotechnical and Biological Sciences Research Council
- British Council
- Business Gateway
- Chambers of commerce
- Creative Scotland
- Department for International Trade (DIT)
- European Commission
- European Court of Auditors
- European Investment Fund
- Highlands and Islands Enterprise (HIE)
- Innovate UK
- Interface

- Scottish Co Investment Fund Partners
- Scottish Funding Council
- Scottish Futures Trust
- Scottish Government
- Skills Development Agency (SDS)
- Scottish Environmental Protection Agency (SEPA)
- Universities Scotland
- Visit Britain
- VisitScotland
- Zero Waste Scotland

## How we use your information

### Public service delivery

Scottish Enterprise (SE) collects and uses personal information about you in order to provide its public services. In general terms, SE collects, uses, stores and shares personal information about you to:

- Deliver its services and meet its legal responsibilities
- Register with our websites
- Verify your identity, where this is required
- Contact you by post, email or telephone
- Understand the needs of your company and how they may be met
- Join with our public sector partners to deliver comprehensive services for you and your company
- As supporting evidence when making claims for funding and support
- Provide you with marketing you have asked for, and to sign you up for events
- Maintain our records
- Process financial transactions
- Carry out background checks and due diligence where appropriate
- Prevent and detect crime, fraud or corruption

### Lawful grounds

Data protection law also says that we must have a legal grounds in order to process your personal information. These are known as lawful grounds. There are six lawful grounds, but we will generally only use 4 of these, as set out below:

Lawful ground	What it means
Consent	You have given your consent for us to process your personal information for a specific purpose.
Contractual	Where you are in a contract with us, we need to process your personal information to allow us to perform our obligations under the contract in our relationship with you.
Legal obligation	Where we need to process your personal information to comply with a legal obligation that applies to us.
Performance of task carried out in the public interest or in the exercise of our official authority	Where we process your personal information using CCTV as a means of monitoring and recording in the exercise of our official authority. Our official authority is derived from the Data Protection (Scotland) Act 1990.

## Recruitment privacy notice

This recruitment privacy notice explains how we collect, use and store personal information about you in the context of applying for employment with us and our recruitment process. It explains the circumstances where we may also have to share personal information. The recruitment privacy notice will also tell you about your privacy rights and how the law protects you.

Personal information, or personal data, means any information about an individual from which that person can be identified. Anything we do with your personal information (from the point at which we collect it until we delete it from our systems) is called processing.

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

This recruitment privacy notice is provided in a layered format, so you can click through to the specific areas set out below.

### Important information

We have appointed a data protection officer (for us, this is our Data Protection and Information Governance Officer [DPIGO]) who is responsible for overseeing questions in relation to this privacy notice. If you have any questions about the privacy notice, including any requests to exercise your

legal rights in respect of your personal information, please contact the DPIGO using the details below.

### Contact details

Claire Thompson  
Data Protection and Information Governance Officer

SubjectAccessRequests@scotent.co.uk  
Atrium Court  
50 Waterloo Street  
Glasgow  
G2 6HQ

### Change to our privacy notice

This is the current version of our privacy notice. It was last updated on March 2019.

### Letting us know about changes to your personal information

It is important that the personal information that we hold about you is accurate and current. Please let us know if your personal information changes during your relationship with us, by contacting us using the details above.

### Personal information we collect

We may collect, use, store and share different kinds of personal information about you. We collect this information at various points during the application, selection and on-boarding processes depending on how your application progresses. To help you identify these, they have been grouped together as follows:

<b>Group Data</b>	<b>Personal information inc</b>
<b>Identity Data</b>	Name, signature, date of certificate, drivers licence
<b>Contact Data</b>	Email address, phone num
<b>Job Data</b>	Employment history, refe
<b>Absence Data</b>	Absence and leave inform contain special category o
<b>Recruitment Data</b>	Applicant responses to in
<b>Health Data</b>	Special Category Data abo adjustments and occupat



- Assess and validate your qualifications and experience
- Ensure that we comply with the law e.g. validating your right to work
- Arrange necessary travel/work visas or immigration application
- Be able to perform the contract we will enter with you
- Perform any obligations and exercise any rights imposed or conferred on us, that we are legally obliged to (e.g equal opportunities monitoring and reporting)
- Understand your needs (e.g. health) and how they may be met during the recruitment process
- Prevent fraud
- Where we need to protect your interests

Further details can be found in the specific sections for how we process your personal information which follow and can be accessed through these links:

- [Applying to work with us](#)
- [Safety and wellbeing](#)
- [Information about criminal convictions](#)

### Lawful grounds

Under data protection law, we must have legal grounds in order to process your personal information. These are known as lawful grounds. There are six lawful grounds, but we will generally only use four of these, as set out below:

Lawful ground	What it means
Consent	You have given your consent for the processing of your personal information for a specified purpose
Contractual	Where you are in a contractual relationship with us, we may process your personal information to allow us to fulfil our contractual obligations
Legal obligation	Where we need to process your personal information in order to comply with a legal obligation placed on us
Vital interests	This is where your personal information is processed where you have let us know that information with other people

### Applying to work for us

<p><b>Personal information processed</b></p>	<ul style="list-style-type: none"> <li>• Identity data</li> <li>• Contact data</li> <li>• Job data</li> <li>• Absence data</li> <li>• Recruitment data</li> <li>• Health data</li> <li>• Equality data</li> <li>• Special category data</li> </ul>
<p><b>Source of personal information</b></p>	<ul style="list-style-type: none"> <li>• Direct Interaction</li> <li>• Third party sources</li> </ul>
<p><b>The purpose for processing</b></p>	<p>Applicants:</p> <ul style="list-style-type: none"> <li>• Making decisions</li> <li>• Determining the</li> <li>• Checking you are</li> <li>• To maintain our r</li> <li>• To assess and val</li> <li>• Overseas deploym</li> <li>• Complying with h</li> <li>• To prevent fraud</li> <li>• To accommodate</li> <li>interview process</li> <li>• To be able to add</li> <li>recruitment proc</li> <li>• To conduct data a</li> <li>equal opportuniti</li> <li>• To enable your pe</li> <li>apply for other ro</li> </ul> <p>Some of the above ground grounds which justify our</p>
<p><b>Lawful ground(s)</b></p>	<p>Contractual</p>

	<p>Legal obligation</p> <p>We do not need your consent or a written policy to carry out our duties under employment law. In limited circumstances, we may ask for your consent to allow us to process your personal information for our Safety and Well-being section. We will provide you with full details of the information we will process and how that you can carefully consider it. Your consent is not a condition of your employment with us from us.</p>
<b>How long we will keep your personal information</b>	If you don't start work with us, we will delete your personal information for us.

### Safety and wellbeing

We have a duty to ensure the safety and well being of all who work with us, in general terms and in compliance with law. To meet that duty, we will process the following personal information for the following purposes:

<b>Personal information processed</b>	<ul style="list-style-type: none"> <li>• Identity data</li> <li>• Contact data</li> <li>• Job data</li> <li>• Absence data</li> <li>• Health data</li> <li>• Special category data</li> </ul>
<b>Source of personal information</b>	Direct Interactions
<b>The purpose for processing</b>	<ul style="list-style-type: none"> <li>• To gain occupational health and safety information to accommodate an employee</li> <li>• To administer first aid</li> <li>• To report any incidents</li> <li>• To put in place emergency procedures</li> </ul>
<b>Lawful ground(s)</b>	<p>Legal obligation</p> <p>Vital interests</p> <p>*We do not need your consent or a written policy to carry out our duties under employment law.</p>

	employment law. In limited circumstances, we may require your consent to allow us to process your personal information (such as for occupational health). If we process your personal information that we would not otherwise process, we will consider whether you wish to consider whether you wish to terminate your contract with us that
<b>How long we will keep your personal information</b>	If you don't start work with us, we will delete your personal information for

### Information about criminal conviction

We will only collect information about criminal convictions if it is appropriate given the nature of the role and where we are legally able to do so.

Where appropriate, we will collect information about criminal convictions as part of the recruitment process or we may be notified of such information directly by you in the course of you working for us. We will use information about criminal convictions and offences in the following ways

- Facilitate the processing of security access cards to worksites where a Disclosure Scotland check is required
- Recruitment or determining an individual's continuing suitability in a position identified as having a fiduciary duty

### Consequences of not providing personal information

If you fail to provide certain information when requested, we may not be able to offer you a role within SE, perform the contract we have entered into with you (such as paying you), or we may be prevented from complying with our legal obligations (such as to ensure the health and safety of our visitors).

### Who we will share your information with

From time to time, we may share your personal information with other third parties, where we have a need to do so, in order to meet our obligations to you or where we are required to do so by law. These third parties, along with the purpose for which we will share your personal information with them, have been grouped together as follows:

<b>Category of organisation</b>
<b>Public sector partners</b>

**Government Bodies**

**Colleges, Universities or other Educational Institutions**

**Other Data Controller**

**Suppliers**

**Security**

We have put in place appropriate security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed.

In addition, our employees, agents, secondees and suppliers will only process personal information on our instructions and in accordance with this privacy statement. They are also subject to a duty of confidentiality.

## **Your rights**

### **Access to your information**

You have the right to request a copy of the personal information we hold about you.

### **Correcting your information**

You may ask us to correct any personal information that you believe is incorrect, incomplete or not up to date.

### **Deletion of your information**

You have the right to ask us to delete personal information about you where:

- You consider that we no longer require the information for the purposes for which it was obtained
- We are using that information with your consent and you have withdrawn your consent – see [Withdrawing consent to using your information](#) below
- You have validly objected to our use of your personal information – see [Objecting to how we may use your information](#) below
- Our use of your personal information is contrary to law or our other legal obligations

### **Objecting to how we may use your information**

Where we use your personal information to perform tasks carried out in the public interest then, if you ask us to, we will stop using that personal information unless there are overriding legitimate grounds to continue.

### **Restricting how we may use your information**

In some cases, you may ask us to restrict how we use your personal information. This might apply where we are checking the accuracy of personal information that we hold or assessing the validity of any objection you have made to our use of your information.

The right might also apply where there is no longer a basis for using your personal information, but you don't want us to delete the data. Where this right is validly exercised, 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.

### **Automated processing**

If we use your personal information on an automated basis to make decisions which significantly affect you, you have the right to ask that the decision be reviewed by an individual to whom you may make representations and contest the decision.

### **Withdrawing consent to using 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.

### **Complaints**

We wish to resolve directly all complaints about how we handle personal information, but you also have the right to lodge a complaint with the Information Commissioner's Office (ICO) whose contact details are as follows:

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

Telephone - 0303 123 1113 (local rate) or 01625 545 745

[ICO website](#)

## **Marketing and events**

Where you wish us to provide you with marketing information (information, updates, newsletters) or wish to attend an event, your personal information will be processed as follows:

### **Personal information processed**

SE collects the following types of personal data:

- Identity data
- Profile data
- Marketing data
- Contact data
- Special category training\*

### **Sources of personal information**

SE collects personal data from the following sources:

- Direct Interactions
- Customer relationship management (CRM) partners
- Public sector partners
- Suppliers

### **The purpose for processing**

Scottish Enterprise processes your data to match your personal information to an existing customer record held by us to:

- Update your preferences
- Create a new customer record if one doesn't currently exist
- Send you the information that you have opted in to receive
- Sign you up to events, seminars and webinars hosted by or on our behalf, and/or our public sector partners
- Create and circulate delegate lists for events

\*Special category data will only be collected for the purpose of meeting any dietary or equality requirements that you may have when you attend an event.

### **Lawful ground**

The lawful ground is consent.

### **Consequences of not providing the personal information**

If you do not provide us with personal information we will be unable to send you our updates and newsletters.

We will also not know who you are when you sign up to our events. And we will be unable to meet your dietary or equality needs.

### **How long we will keep your personal information**

Your personal information will be retained until you advise us that you wish to unsubscribe or opt-out from receiving marketing information.

Personal information processed for events will be deleted within six months from event date to allow statistics to be gathered, anonymised and analysed. If we need to hold your personal details for longer, we will advise you accordingly with the reason why. Special category data will be deleted within one month of event date.

Find out more about [how we use your information](#).

## **Funding and support**

Scottish Enterprise (SE) provides a range of funding and support to its customers. SE also includes Scottish Development International and our investment arm.

In order to provide that funding and support we need to process personal information from time to time. The amount of personal information required and the purpose for processing of personal information varies depending on the nature and type of the funding and/or support a customer needs. We have set out below, in general terms, the types and purposes for processing personal information where this relates to funding and support.

### **Personal information processed**

SE would process personal information in the following areas:

- Identity data
- Contact data
- Claims data
- Due diligence data
- Financial data
- Transaction data

There may also be instances where we need to process special category data (e.g. as part of director's disclosure letters for investments). Where special category data is required we will let you know the purpose for processing this and the lawful basis on which we rely. Where we rely on consent we will seek your express consent to this.

### **Source of personal information**

For accessing funding and support, sources of your personal information would come from the following areas:

- Direct interactions
- Employer or company
- Public sector partners
- Customer relationship management (CRM) partners
- Third party sources
- Suppliers

### **The purpose for processing**

SE would need to process your personal information for the following purposes:

- As a point of contact for funding and support applications
- To undertake due diligence for fraud prevention
- To undertake background checks to ascertain whether you have been involved in unlawful acts (or failures to act), dishonesty, malpractice or other serious improper conduct – including, for example, bribery, corruption, terrorist financing or support, violations of human rights or civil liberties, or breaches of law
- To assess the need for funding and support
- Appraisal of applications for funding and support
- To enable the delivery of funding and support
- As evidence substantiating claims for payment of funding and support:
- To make payments of funding and support
- To analyse and report on funding and support

- To meet requirements of regulatory frameworks
- To audit our compliance with regulatory frameworks
- Management of investments, including monitoring the use of investment funds and processing consents
- To consider you as a non-executive director and match you with opportunities within our portfolio companies

### **Lawful ground(s)**

There are lawful grounds why SE would need to collect and use your personal information. These are:

- Contractual
- A legal obligation – much of our funding and support is provided under European legislation, which requires us to process personal information;
- Performance of task in the public interest task/exercise of our official authority (using funds appropriately)
- To meet generally accepted requirements of good practice for conducting due diligence and background checks for a public body in making decisions whether to provide funding and support

We will use **consent** as the lawful ground for processing personal information for the purposes of non-executive directors.

### **Consequences of not providing the personal information**

If you do not provide SE with personal information, we will be unable to provide funding and support.

### **How long we will keep your personal information**

European legislation, under which we provide much of funding and support specifies the periods of time for which we have to keep documentation relating to funding and support we have granted. This is generally, 10 years from the date of the end of the European funding programme. For example, funding and support given under a 2014-2020 programme will require to be retained until the end of 2030.

However, where personal information is processed for the purpose of managing investments, we will retain this for so long as we continue to be invested in the Company, and for a period of 5 years after we have exited a company or in accordance with the relevant ERDF programme, whichever is later.

Supplier details will be retained for 12 years from last activity date.

Find out more about [how we use your information](#).

## **Research**

Scottish Enterprise (SE) undertakes research and evaluation to support improvements to our services and economic development in Scotland.

### **Personal information processed**

SE collects the following types of personal data:

- Identity data
- Contact data
- Profile data
- Usage data

### **Sources of personal information**

SE collects personal data from the following sources:

- Direct interactions
- Employer or company
- Public sector partners
- Customer relationship management (CRM) partners
- Third party sources/publicly available sources

### **The purpose for processing**

SE conducts focused research to:

- Support our strategy, business planning and investment decisions
- Monitor and improve the effectiveness, efficiency and impact of our interventions/support
- Understand the need/demand for our products and services and support the redesign of these.

We will use the personal information detailed above to contact you to invite you to participate in our research.

### **Lawful ground**

Performance of task in the public interest task/exercise of our official authority.

### **Consequences of not providing the personal information**

If you do not give us personal information, we will be unable to carry out strategic research that is necessary for the development of the Scottish economy.

### **How long we will keep your personal information**

For the period of the research, and no longer than two years after the research is completed.

Find out more about [how we use your information](#).

## **Enquiries**

When you make an enquiry to the Scottish Enterprise (SE) enquiry service, it will be processed in the following ways.

### **Personal information processed**

SE collects the following types of personal data:

- Identity data
- Contact data

### **Source of personal information**

Your direct interactions with SE are a source of personal information.

### **The purpose for processing**

SE collects personal data for the following purposes:

- To keep you informed of the status of your enquiry
- To answer your enquiry/complaint
- To respond to freedom of information requests
- To exercise data subject rights
- To respond to data subject rights requests
- To create a new customer record

If you proceed to receive funding and support from us your personal information will be processed as described in our funding and support category.

### **Lawful grounds**

SE collects personal data for the following legal reasons:

- Contractual
- Legal obligation

### **Consequences of not providing the personal information**

If you do not give us personal information, we will be unable to answer your queries.

We will also be unable to meet our legislative requirements under the following areas:

- Freedom of Information (Scotland) Act 2002
- Environmental Information (Scotland) Regulations 2004
- The INSPIRE Regulations 2009
- The General Data Protection Regulation 2016/679
- The Data Protection Act 2018

## **How long we will keep your personal information**

Your personal information will be retained for a period of two years after your enquiry is answered, or as part of our legal requirements. If there is a continuation of service, (e.g. funding and support) your personal information will be retained as per the details of that service.

Find out more about [how we use your information](#).

## **CRM Partnership**

The CRM (customer relationship management) Partnership is a group of public sector organisations, principally charged with the economic development of Scotland.

The CRM Partnership comprises:

- Scottish Enterprise (SE)
- Scottish Development International (a joint venture among Scottish Enterprise, Highlands and Islands Enterprise and Scottish Government)
- Business Gateway (represented by COSLA)
- Skills Development Scotland

### **Purpose of the CRM Partnership**

The CRM Partnership's purpose is to provide a consistent, co-ordinated approach to delivery of services to its customers. To better serve this purpose, the members of the CRM Partnership have come together to share one CRM system. It is on the CRM system that all personal information and non-personal information of the CRM Partnership's customers will be stored.

Personal Information in the CRM system will be processed by the CRM partners as follows:

### **Personal information processed**

The CRM Partnership processes the following types of personal data:

- Identity data
- Contact data
- Transaction data
- Profile data
- Marketing data

### **Source of personal information**

The CRM Partnership collects personal information from the following sources:

- Direct interactions
- Employer or company
- Third party sources/publicly available sources

## **The purpose for processing**

The CRM Partnership collects personal data in order to:

- Provide consistent, clear and co-ordinated engagement with our customers on products, services and support that they are interested in
- Enable better design of business support services across the wider public-sector landscape
- Create opportunities to refer across and between CRM partners, develop shared understanding and to monitor the effectiveness and responsiveness of the CRM partners' individual service offerings
- Collaborate on the design of future services and interventions as a result of insights gained from a shared system, aggregated data and better understanding of what support the customer of the CRM customers are seeking and receiving in real time
- Provide you with information you have requested from us as part of our marketing services – please see Marketing and Events for further information
- Answer any enquiries you have submitted to us – please see [Enquiries](#) for further information.
- Provide your business with funding and support – please see [Funding and Support](#) for further information

## **Lawful grounds**

Performance of task in the public interest task/exercise of our official authority.

## **Consequences of not providing the personal information**

The CRM Partnership will not be able to provide you or your business with the best possible support.

## **How long we will keep your personal information**

We will keep your personal information for the period of your relationship with us plus 18 months if no funding has been provided.

Where funding has been provided, we are required to retain your information as specified by the relevant UK or European legislation. This is generally, 10 years from the date of the end of the European funding programme. For example, funding and support given under a 2014-2020 programme will require to be retained until the end of 2030.

Find out more about [how we use your information](#).

## **Providing Scottish Enterprise with goods and services**

As a supplier to Scottish Enterprise (SE), there will be a need to process personal information, either because you are the principal point of contact for your company, or your information has been included as part of a tender response.

Where you are a supplier to Scottish Enterprise, your personal information will be processed as follows:

## **Personal information processed**

SE will process the following types of personal data:

- Identity data
- Contact data
- Financial data
- Transactional data

## **Source of personal information**

SE collects personal data from the following sources:

- Direct interactions
- Employer or company
- Public sector partners
- The purpose for processing
- To submit a bid in response to a tender
- To assess a bid in response to a tender
- To make payment in exchange of delivery of goods and/or services
- To issue feedback surveys to you

## **Lawful grounds**

SE collects personal data for the following lawful reasons:

- Contractual
- Legal obligation

## **Consequences of not providing the personal information**

We will be unable to consider your bid or to enter into a contract with you or your company.

## **How long we will keep your personal information**

We will keep your personal information for the period of your contractual relationship with us plus 10 years (or for 20 years for construction project contracts). Where your tender has been unsuccessful we will keep your information for one year from the contract award date.

Supplier details will be retained for 12 years from last activity date.

Find out more about [how we use your information](#).

# **TalentScotland**

**TalentScotland promotes Scotland as an outstanding place to live and work.**

TalentScotland offers information about visas and immigration, industries and employers in Scotland as well as job opportunities. As part of the service we provide, we will process personal information as follows:

### **Personal information processed**

SE will process the following types of personal data:

- Identity data
- Contact data
- Profile data
- Marketing data

### **Source of personal information**

- Direct interactions

### **The purpose for processing**

SE needs to process your personal information in the following situations:

- When you register with the [TalentScotland website](#)
- When you make an enquiry with the TalentScotland service
- To respond to your enquiry
- To take part in optional contests and surveys
- To track your use of the TalentScotland website
- To provide you with the information and services that you request from TalentScotland
- To provide you with information about other services TalentScotland offers that are similar to those that you have already enquired about
- To notify you about changes to TalentScotland's services
- To improve the TalentScotland website to ensure that content is presented in the most effective manner for you and for your computer
- To administer the TalentScotland website and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes
- To keep the TalentScotland website safe and secure
- To measure or understand the effectiveness of advertising TalentScotland serves to you and others, and to deliver relevant advertising to you
- To make suggestions and recommendations to you and other users of the TalentScotland website about services that may interest you or them

Additional terms and conditions may apply to contests which will be notified to prospective applicants.

### **Lawful grounds**

- Consent

### **Consequences of not providing the personal information**

We will not be able to provide the TalentScotland service to you.

Find out more about [how we use your information](#).

## **GlobalScot**

The GlobalScot network is a service delivered, and governed, by Scottish Enterprise (SE).

Its purpose is to assist across a number of key areas and have a direct impact on your business - from advice on preparing for new market entry and finding customers, to identifying potential partners and suppliers. GlobalScot features the GlobalScots themselves and those who benefit from the service. How we use your personal information will differ depending on whether you are a GlobalScot or a beneficiary of the service.

### **Personal information processed**

#### **GlobalScot**

SE will process the following types of data for GlobalScots:

- Identity data
- Contact data
- Profile data
- Marketing data

#### **User of the GlobalScot service**

For users of the GlobalScot Service, SE will process the following types of data:

- Identity data
- Contact data
- Profile data
- Marketing data

### **Source of personal information**

#### **GlobalScot**

As a GlobalScot, sources of your personal information will come from:

- Direct interactions
- Third party sources/publicly available sources

#### **User of the GlobalScot service**

As a user of the GlobalScot service, sources of your personal information will come from:

- Direct interactions

### **The purpose for processing**

#### **GlobalScot**

As a GlobalScot, SE will need to process your personal information to:

- Consider your nomination as a GlobalScot
- Share biographical information (not contact data) with Scottish Government colleagues in the Department of International Trade and Investment
- Create and publish a profile to the secure GlobalScot website
- Log any activity against your record, relating to you in your capacity as a GlobalScot (e.g. any support you have provided at events or to Scottish companies)
- Provide you with information or communications relating to GlobalScot activities/events or any changes to the network
- Inform you of a request (of you) for support with approved Scottish companies of the network
- Maintain our records and ensure information is up to date
- Answer your enquiries
- Participate in calls, with Relationship Managers, on how you might support (engagement plan) Scottish companies
- Share individual details of your activity as a GlobalScot with Scottish Ministers ahead of key events in which you may have been invited/attending.

#### **User of the GlobalScot service**

As a user of the GlobalScot service, SE will need to process your personal information to:

- To consider your registration with and access to the secure GlobalScot network
- To log any request activity/engagement that you have with the network
- To provide you with information or communications relating to GlobalScot activity/events or any changes to the network
- To share your details with fellow GlobalScots
- To connect you with GlobalScot(s) to whom you have submitted a request (upon the GlobalScots approval)
- To answer your enquiries
- To participate in calls, with Relationship Managers\* (internal SE employees), on how you might seek support from the network

### **Lawful grounds**

#### **GlobalScot**

- Consent

#### **User of the GlobalScot service**

- Consent

#### **Consequences of not providing the personal information**

##### **GlobalScot**

If you do not provide personal information, your nomination and access to the GlobalScot network will not be possible.

##### **User of the GlobalScot service**

If you do not provide personal information, your registration and access to the GlobalScot network will not be possible.

#### **How long we will keep your personal information**

##### **GlobalScot**

As a GlobalScot, we will keep your personal information:

- Where your nomination as a GlobalScot is accepted, your personal information will be retained for so long as you remain a GlobalScot.
- If your nomination is rejected or if you are no longer a GlobalScot, your personal information will be destroyed after a maximum period of 12 months.

##### **User of the GlobalScot service**

As a user of the GlobalScot service, we will keep your personal information:

- Where your registration with the GlobalScot network is approved, your personal information will be retained for so long as you remember a member of the network.
- Where your registration is not approved, your personal information will be immediately deleted.
- Where you leave the network, your personal information will be deleted after a maximum period of 12 months.

Find out more about [how we use your information](#).

## **International**

### **Scottish Enterprise worldwide**

Scottish Enterprise operates internationally, through its overseas arm, Scottish Development International (SDI). Our partners in SDI are the Scottish Government and Highlands and Islands Enterprise.

We may share your personal information with our SDI field offices. In some instances, this may involve transferring your personal data outside the European Economic Area (EEA). We ensure that

your personal information is protected by requiring all our SDI offices and staff to follow the same rules when processing your personal information.

To provide the best services possible on an international scale, we may also share your personal information with our third party partners outside the European Economic Area.

Where your personal information is transferred outside the EEA, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

We will only transfer your personal information to countries that have been deemed to provide adequate level of protection for personal data by the European Commission.

Where we use certain service providers we may use specific contracts approved by the European Commission which give personal information the same protection it has in Europe.

## Security

We have put in place appropriate security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed.

Our employees, agents, secondees and suppliers will only process personal information on our instructions and in accordance with this privacy statement. They are also subject to a duty of confidentiality.

## Your rights

### Access to your information

You have the right to request a copy of the personal information about you that Scottish Enterprise (SE) holds.

### Correcting your information

SE wants to make sure that your personal information is accurate, complete and up to date and you may ask SE 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 SE to delete personal information about you where:

- You consider that SE no longer requires the information for the purposes for which it was obtained
- SE is using that information with your consent and you have withdrawn your consent – see [Withdrawing consent to using your information below](#)
- You have validly objected to SE's use of your personal information – see [Objecting to how we may use your information below](#)
- SE's use of your personal information is contrary to law or SE's other legal obligations.

## **Objecting to how we may use your information**

You have the right at any time to require SE to stop using your personal information for direct marketing purposes. In addition, where SE uses your personal information to perform tasks carried out in the public interest or in exercising official authority vested in it then, if you ask it to, SE will stop using that personal information unless there are overriding legitimate grounds to continue.

## **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 about you that we hold or assessing the validity of any objection you have made to SE's use of your information.

The right might also apply where SE no longer has a basis for using your personal information but you don't want SE to delete the data. Where this right to validly exercised, SE may only use the relevant personal information with your consent, for legal claims or where there are other public interest grounds to do so.

## **Automated processing**

If SE uses your personal information on an automated basis to make decisions which significantly affect you, you have the right to ask that the decision be reviewed by an individual within SE to whom you may make representations and contest the decision. This right only applies where SE uses your information with your consent or as part of a contractual relationship with you.

## **Withdrawing consent using your information**

Where SE uses your personal information with your consent you may withdraw that consent at any time and SE will stop using your personal information for the purpose(s) for which consent was given.

## **Contacts**

Get in touch if you wish to exercise any of these rights.

[Submit an enquiry](#)

[0300 013 3385](tel:0300 013 3385)

# **Complaints**

## **Complaints procedure**

You can make your complaint in person, by phone, by email or in writing.

We have a two-stage complaints procedure. We'll always try to deal with your complaint quickly but if it's clear the matter will need a detailed investigation, we'll tell you and keep you updated on our progress.

### **Stage 1: Frontline resolution**

We'll always try to resolve your complaint quickly, within five working days if we can. If you're not satisfied with our response, you can ask us to consider your complaint at Stage 2.

## **Stage 2: Investigation**

We'll look at your complaint at this stage if you are dissatisfied with our response at Stage 1. We also look at some complaints immediately at this stage, if it's clear that they're complex or need detailed investigation.

We'll acknowledge your complaint within three working days. We'll give you our decision as soon as possible. This will be after no more than 20 working days unless there is clearly a good reason for needing more time.

If, after receiving our final decision on your complaint, you remain dissatisfied with our decision or the way we have handled your complaint, you can ask the Scottish Public Services Ombudsman (SPSO) to consider it.

### **What is a complaint?**

An expression of dissatisfaction by one or more individuals about the standard of service, action or lack of action by or on behalf of Scottish Enterprise.

A complaint may relate to:

- The quality and standard of service
- Failure to provide a service
- Dissatisfaction with a Scottish Enterprise policy
- Treatment by or attitude of a member of staff
- Disagreement with a decision where the customer cannot use another procedure (for example an appeal) to resolve the matter
- The failure of Scottish Enterprise to follow an appropriate administrative process

Your complaint may involve more than one service or be about someone working on our behalf.

### **What's not covered under our complaints handling procedure?**

There are some things we can't deal with through our complaints handling procedure, including:

- A routine first-time request for a service
- A request under the Freedom of Information (Scotland) Act or Data Protection Act
- A request for information or an explanation of policy or practice
- A response to an invitation to provide feedback through a formal mechanism such as a questionnaire will generally not be treated as a complaint
- A grievance by a member of staff which is eligible for handling through the grievance procedure
- A request for compensation only
- Issues that are in court or have already been heard by a court or a tribunal
- Disagreement with a decision where a statutory right of appeal exists

- An attempt to reopen a previously concluded complaint or to have a complaint reconsidered where we have already given our final decision

If other procedures or rights of appeal can help you resolve your concerns, we will give information and advice to help you.

### **Who can complain?**

Anyone can make a complaint to us, including the representative of someone who is dissatisfied with our service.

### **How to lodge a complaint**

You can complain in person at any of our offices, by phone, in writing or by email.

It's easier for us to resolve complaints if you make them quickly and directly to the service concerned. So talk to a member of our staff and they can try to resolve any problems on the spot.

When complaining, tell us:

- Your full name and address
- As much as you can about the complaint
- What has gone wrong
- How you want us to resolve the matter

### [Contact us](#)

Write to us at the following address:

Scottish Enterprise  
Enquiry Fulfilment and Research Service  
Caspian House  
2 Mariner Court  
8 South Avenue  
Clydebank G81 2NR

Call 0300 013 3385 (local rate)

Email us at [enquiries@scotent.co.uk](mailto:enquiries@scotent.co.uk)

### **Personal information**

Scottish Enterprise seeks to resolve directly all complaints about how it handles personal information.

Got a complaint?

### [Contact us](#)

If you're not satisfied with our response, you also have the right to lodge a complaint with the Information Commissioner's Office (ICO).

Write to the ICO at the following address:

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

Call 0303 123 1113 (local rate) or 01625 545 745

[Go to the Information Commissioner's Office website](#)

### **Is there a time limit to make a complaint?**

Normally, you must make your complaint within six months of:

- The event you want to complain about, or
- Finding out that you have a reason to complain, but no longer than 12 months after the event itself

In exceptional circumstances, we may be able to accept a complaint after the time limit. If you feel that the time limit should not apply to your complaint, please tell us why.

### **What happens when you complain?**

We'll always tell you who is dealing with your complaint. Our complaints procedure has two stages:

#### **Stage 1: Frontline resolution**

We aim to resolve complaints quickly. This could mean an on-the-spot apology and explanation if something has clearly gone wrong, and immediate action to resolve the problem.

We'll give you our decision at Stage 1 in five working days or less, unless there are exceptional circumstances.

If we can't resolve your complaint at this stage, we'll explain why and tell you what you can do next. We might suggest you take your complaint to Stage 2. You may choose to do this immediately or sometime after you get our initial decision.

#### **Stage 2: Investigation**

Stage 2 deals with two types of complaint: those that have not been resolved at Stage 1 and those that are complex and require detailed investigation.

When using Stage 2 we'll:

- Acknowledge receipt of your complaint within three working days
- Where appropriate, discuss your complaint with you to understand why you remain dissatisfied and what outcome you are looking for
- Give you a full response to the complaint as soon as possible and within 20 working days

We'll let you know if our investigation will take longer than 20 working days. We'll agree revised time limits with you and keep you updated on progress.

### **What if you're still not satisfied?**

After we've fully investigated, if you're still dissatisfied with our decision or the way we dealt with your complaint, you can ask the Scottish Public Services Ombudsman (SPSO) to look at it.

The SPSO cannot normally look at:

- A complaint that has not completed our complaints procedure (so please make sure it has done so, before contacting the SPSO)
- Events that happened, or that you became aware of, more than a year ago
- A matter that has been or is being considered in court

[Contact the SPSO](#)

### **Getting help**

We understand you may be unable or reluctant to make a complaint yourself. We accept complaints from the representative of a person who is dissatisfied with our service. We can take complaints from a friend, relative or an advocate, if you have given them your consent to complain for you.

Find out about advocates in your area by contacting the Scottish Independent Advocacy Alliance.

[Scottish Independent Advocacy Alliance website](#)

We're committed to making our service easy to use for all members of the community. In line with our statutory equality duties, we'll always ensure that reasonable adjustments are made to help customers access and use our services.

Get in touch if you have trouble putting your complaint in writing or want this information in another language or format, such as large font, or Braille.

[Contact us](#)

## **Contact data protection**

### **Contact our data protection officer**

We have appointed a data protection officer (for us, this is our Data Protection and Information Governance Officer (DPIGO) who is responsible for overseeing questions in relation to this privacy notice. If you have any questions about the privacy notice, including any requests to exercise your legal rights in respect of your personal information, please contact the DPIGO using the details below.

Claire Thompson  
Data Protection and Information Governance Officer  
Atrium Court  
50 Waterloo Street  
Glasgow G2 6HQ

[enquiries@scotent.co.uk](mailto:enquiries@scotent.co.uk)

0300 013 3385 - (calls charged at local rates)

0141 846 0200 - from mobile phones or if outside Scotland

Minicom 0800 023 2071 - if you are deaf or hard of hearing (BT helpline 0800 731 1888)

