You can see our <u>privacy statement</u> and <u>general privacy notice</u> on our website for further details on how we collect, use, share and store personal information along with information about exercising your rights.

Specific processing purposes and legal basis, etc: Business re-opening register enquiries and survey responses



(controller) who we are:

Glasgow Life, the operating name of Culture and Sport Glasgow, is the controller of personal information collected by us that is necessary for our processing purposes. See contact us for details of our data protection officer.



Specific (purposes) why do we need your personal information and what do we do with it? We work with businesses and industry stakeholders to profile and promote Glasgow and tourism, conventions and events businesses on our digital channels to our subscribers and audiences. We need the information about you and your business re-opening plans that are collected through this survey or by other means of contact with us (e.g phone, email, social media, post, etc) to compile a business re-opening register we can use to carry out our activities to profile and promote Glasgow. We are collecting this business information when:

- You are completing this survey; or
- When you are contacting us to seek information or advice, or to update us, about your plans for re-opening;

as part of managing the impact of Covid-19 and the different phases of easing of the government restrictions so that we can profile and promote Glasgow and your business on your behalf to the right audiences at the right time.

Business data is any information relating to a business (this may however contain elements of personal information) and would include:

Your full name; postal address; business name and job title; e-mail address; records of your contact or correspondence with us; phone number(s); social media profile(s); business re-opening plans; and any other information you may share with us to help profile or promote your business or deal with your enquiry.

As a business / industry sector stakeholder engaging with our services we would use your information to:

- 1. Send you a publication, press release, newsletter or email communication.
- 2. Facilitate your attendance at an event, as a guest, participant, visitor, buyer, speaker or exhibitor.
- 3. Provide your business details to visitors/consumers, who may be interested in your products or services.
- 4. Provide your business details to other businesses, who may be interested in your products or services, for example, tour operators, public sector partners, local authorities, destination management organisations.
- 5. Ask for your feedback via a survey.
- 6. Respond to a consumer media and/or travel trade media enquiry, which could potentially profile your businesses in local, Scottish, UK and/or international editorial.
- 7. Communicate with you to approve the use of our logos in your marketing activity
- 8. Communicate with you if you contact us via social media.

- 9. Meet with you at events, meetings or exhibitions.
- 10. Follow up with you by email on information discussed at an appointment or at an event where you met one of our representatives or partners we work with.
- 11. Take photos or film footage at one of our events or exhibitions; or record one of our online webinars.
- 12. Publicise one of our events or exhibitions.
- 13. Nominate yourself, your business or someone else for an award.

Some information is analysed after collection and during use to provide anonymised statistical information to help improve services, monitor equality and other similar purposes.



Specific (sharing) who do we share your information with?

With your permission, where appropriate, we may share your business details (which may include personal information) with other organisations, individuals or into the public domain via our digital channels. For example:

- We will make your business details available on our website(s) and digital media channels.
- We may share your business details with existing or potential clients who enquire about your organisation or about services that your organisation are providing.
- We are legally obliged to share certain business data and statistical information with other public bodies who fund our activities, e.g. Glasgow City Council, Visit Scotland and Scottish Enterprise.
- We may share necessary and limited information with our processors who provide or support some of the services we deliver. We will only share this information if we are confident that they will follow our written instructions under a contractual agreement and that they will not use any information for their own purposes.



Specific (legal basis) for using your information:

Under the General Data Protection Regulation (GDPR) and Data Protection Act 2018, we rely on one or more of the following lawful bases for processing this information:

- Necessary for the performance of a contract with you (or to take steps to enter into a contract with you).
- Necessary for the performance of a task carried out in the public interest by Glasgow Life under section 176 (tourism related activities) of the Local Government (Scotland) Act 1994.
- With your consent. You are able to remove your consent at any time. You can do this by contacting us or if subscribed to receiving marketing emails by clicking the unsubscribe link in any marketing communications we send you.
- We have a legitimate interest*.

*Personal data may be legally collected and used if it is necessary for a legitimate interest we or another third party has as long as its use is fair and does not adversely impact the rights of the individual concerned. If we use your personal information in this way, we will inform you before relying on this legal basis. We will always consider if it is fair and balanced to do so and if it is within your reasonable expectations and we will balance your rights and our legitimate interests to ensure that we use your personal information in ways that are not unduly intrusive or unfair.

You can see a summary of how your rights are implemented for each legal basis used at: www.glasgowlife.org.uk/privacy-rights.



Specific (international transfers) if any apply

We don't plan to make any international transfers of personal data although by nature of destination marketing, which includes international audiences, we may share your business

information (which could include personal data) to individuals or organisations overseas who are interested in your products or services.



Specific (profiling) or automated decision-making:

We don't use automated decision-making. By nature of the profiling activities we will carry out, manual profiling and some automated profiling is carried out for our <u>marketing purposes</u>.



(storage) how long do we keep your information for?

We will only keep your personal information for the minimum period amount of time necessary. Sometimes this time period is set out in law, but in most cases it is based on business need. We will delete your data if you withdraw or refuse your consent when it is collected on the lawful basis of consent. We maintain a records retention schedule which sets out how long we hold different types of information. You can view this on our website at: www.glasgowlife.org.uk/rrs. Please also see the summary of how your rights are implemented for each legal basis used at: www.glasgowlife.org.uk/privacy-rights.



(more information):

You can find more details about how we handle your personal information at: www.glasgowlife.org.uk/privacy. If you need help in another format e.g. large print, braille or audio, please ask a member of staff, contact us or visit: www.glasgowlife.org.uk/accessibility



(contact us): You can contact our data protection officer about any data protection matter by post at this address: c/o Data Protection, GCC, City Chambers, George Square, Glasgow G2 1DU, United Kingdom; by email at: dataprotection@glasgow.gov.uk; and by telephone on: 0141 287 1055.

Version 1.0 July 2020