

# **PAISLEY FIRST LIMITED**

## **PRIVACY NOTICE**

Paisley First Limited is committed to protecting your privacy and the confidentiality of your personal information. This privacy notice explains how we collect, use and protect your personal information

### **1. Introduction**

- 1.1 This Privacy Notice explains your privacy rights and how we gather, use and share your personal information. That includes the personal information we already hold about you now and the further personal information we might collect about you, either from you or from a third party. How we use your personal information will depend on the services we provide to you.
- 1.2 This Privacy Notice provides information about how we use your personal information and will update any previous information we have given you about using your personal information (also referred to as personal data).
- 1.3 We are the controller of your personal information under applicable data protection legislation, unless otherwise stated in this Privacy Notice or otherwise provided for in applicable data protection legislation.
- 1.4 If you have any queries regarding our use of your personal information, please contact Graeme W. McGowan at [gwm@msmlaw.co.uk](mailto:gwm@msmlaw.co.uk) or at 51 Moss Street, Paisley PA1 1DR.
- 1.5 If your personal details change or if you change your mind about any of your marketing preferences, please contact us at [ask@paisleyfirst.com](mailto:ask@paisleyfirst.com) or by post to 51 Moss Street, Paisley PA1 1DR.
- 1.6 In this Privacy Notice, the terms "we", "us" and "our" refer to Paisley First Limited.

### **2. Your Privacy Rights**

- 2.1 You can exercise any of your rights by contacting us at [ask@paisleyfirst.com](mailto:ask@paisleyfirst.com) or by post to 51 Moss Street, Paisley PA1 1DR
- 2.2 Any requests received by Paisley First Limited will be considered under applicable data protection legislation. If you remain dissatisfied, you have a right to raise a complaint with the Information Commissioner's Office at [ico.org.uk](http://ico.org.uk).

Right to be informed	This Privacy Notice informs you about the collection and use of your personal information.
Right to access	You have a right to request access to the personal information that we hold about you by making a "subject access request".

Right of rectification	If you believe that any of the personal information that we hold about you is inaccurate or incomplete, you have a right to request that we correct or complete that personal information.
Right of erasure	If you wish us to delete the personal information that we hold about you, you may request that we do so in certain circumstances.
Right to restrict processing	You have a right to request that we restrict the processing of the personal information that we hold about you for specific purposes.
Right to object	You have a right to object to us processing your personal information in certain circumstances.
Right to portability	You have a right to obtain and reuse the personal information that we hold about you for your own purposes in certain circumstances.
Rights related to automated decision-making	Where we undertake any automated decision-making and profiling, you have certain rights in relation to such processing.

### **3. The categories of personal information we use**

3.1 Paisley First Limited use personal information relating to membership.

3.2 In all cases, we need to use your name, address and contact details.

Contact and socio-demographic information	In all cases, we need to use your name and contact details, including your postal address, email address and phone number.
Information relating to payment, credit and debits.	Levy funds received from members. We do not store credit or debit card details, but will use them to process payments made.
Open data and public records	Personal information relating to individuals that are, or can be, collected from public or open sources. These do not necessarily have to be collected from open data/public records, and may come from other sources

### **4. How we gather personal information**

4.1 We obtain personal information from a wide range of sources:

4.1.1 Directly from you or your representative, for example when you contact us in writing, by email, in person, by telephone, or by any other method.

4.1.2 From information you or your representative have made publicly available.

4.1.3 From open data and public records, for example from various registers (Land Register, Companies House, OSCR, etc.)

## **5. How we use your personal information**

### **5.1 To respond and communicate**

5.1.1 We use personal information to allow us to respond to you and communicate with you regarding your membership, questions, comments, support needs, complaints or concerns.

### **5.2 Using membership information**

5.2.1 When you become a member, we will collect, store and use the personal information that you provide to us during the course of our membership.

5.2.2 We need to collect personal information so that we can perform our obligations under your membership agreement with us. We will use such personal information to:

5.2.2.1 provide members with information, including communicating with them by email, letter and/or telephone, etc. in connection with their membership.

5.2.3 If members do not provide us with all of the personal information that we need to collect in order to perform our obligations under their membership agreement, then this may affect our ability to provide them with membership services.

### **5.3 Corporate members**

For corporate members we will use personal information about key individuals in the business, so that we can operate and administer the membership services which we provide.

### **5.4 Financial management and debt recovery**

We may give personal information to and receive personal information from third parties where that is necessary to recover debts due by you to us, for example, Renfrewshire Council and sheriff officers.

### **5.5 To provide membership services to you**

We will use contact details provided by our to provide membership services. We may send out invitations to events and seminars that we run, which we think would be of interest.

### **5.6 Online Activity**

Our websites may, from time to time, contain links to and from other websites operated by third parties. These are provided for your information and convenience only. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal information to these websites.

## **6. Our legal basis for using your personal information**

6.1 We only use your personal information where that is permitted by the applicable data protection legislation. We only use personal information where:

- 6.1.1 we have your consent (if consent is needed);
  - 6.1.2 we need to use the information to comply with our legal obligations;
  - 6.1.3 we need to use the information to perform a contract with you, including taking steps to enter into a contract with you; and/or
  - 6.1.4 it is fair to use the personal information either in our interests or someone else's interests, where there is no disadvantage to you – this can include where it is in our interests to promote our services by sending clients communications with information for upcoming events and legal updates; inviting clients as guests to our events.
- 6.2 Where we use personal information under 6.1.4 above, you may contact us at [ask@paisleyfirst.com](mailto:ask@paisleyfirst.com) to opt out of receiving communications or select the types of communications that you would like to receive or update your preferences through our client portal.
- 6.3 Where we have your consent, you have the right to withdraw it at any time.

## **7. Sharing personal information**

We may be required by law to share personal information with statutory or regulatory authorities and organisations to comply with statutory obligations imposed both upon us and upon you. In such event, we will only share such personal data strictly required for the specific purposes and take reasonable steps to ensure that recipients shall only process the disclosed personal data in accordance with those purposes.

## **8. Storing personal information**

- 8.1 We will protect your personal information in order to prevent unauthorised access to, or use or disclosure of, your personal information through a number of organisational and technical security measures. Your personal information is stored on our systems to which access is both physically and electronically controlled.
- 8.2 For the purposes of IT hosting and maintenance, the personal information we hold is located on servers within the European Union.
- 8.3 Our staff receive data protection training and we have detailed data protection and information security procedures in place.

## **9. How long we keep your personal information for**

We will retain your personal information for as long as is required to comply with our obligations set out above, unless you ask us to return any copies of it to you or send it to a third party.