

## **PRIVACY NOTICE – RECORDED EVENTS, MEETINGS & VOICE CALLS**

The Scottish Police Authority (SPA) respects your privacy and is committed to protecting your personal data. This privacy notice explains how the Scottish Police Authority (SPA) will collect, use or otherwise process the personal data we collect from you during recorded events, meetings and voice calls. Recorded can also mean screen captured images during such events, meetings or calls.

### **1. IMPORTANT INFORMATION AND WHO WE ARE**

#### **Purpose Of This Privacy Notice**

This Privacy Notice aims to give you information on how we collect and process your personal data if you are an attendee a recorded event or meeting.

The Authority records Board and Committee meetings and may record other meetings and events and may make those recordings available to the public on its website.

It is important that you read this Privacy Notice and any other Privacy Notice or fair processing information that we may provide on specific occasions when we are collecting or processing personal data relating to you.

This Privacy Notice is intended to be read together with other relevant SPA notices and is not intended to replace them.

#### **Data Controller**

The SPA (referred to as: "SPA", "we", "us" or "our" in this Privacy Notice) is a data controller and is responsible for your personal data. We have appointed a Data Protection Officer (DPO) who is responsible for overseeing questions in relation to this Privacy Notice. If you have any questions about this Privacy Notice, please contact the SPA's DPO using the details set out below.

## **CONTACT DETAILS**

Data Protection Officer  
Scottish Police Authority  
[SPAIM@spa.police.uk](mailto:SPAIM@spa.police.uk)  
1 Pacific Quay  
Glasgow G51 1DZ

## **2. THE DATA WE COLLECT ABOUT YOU**

“Personal data” is information relating to you as a living, identifiable, individual. The SPA will process your personal data in accordance with the Data Protection Act 2018 and the UK GDPR.

### **Classes of Data**

The Authority may record;

Name (as given)  
Occupation  
Telephone number  
Live images

Certain personal data is subject to additional safeguards under data protection legislation. Such information includes details of

- your racial or ethnic origin;
- your political opinions;
- your religious beliefs or other beliefs of a similar nature;
- whether you are a member of a trade union;
- your physical or mental health or condition;
- your sexual life;
- the commission or alleged commission by you of any offence, or
- any proceedings for any offence committed or alleged to have been committed by you, the disposal of such proceedings or the sentence of any court in such proceedings.

The Authority has no requirement from attendees to record any of the aforementioned data during their meetings.

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If you voluntarily disclose your sensitive personal data during a meeting or call, we shall treat that as your explicit consent for us to hold that data, which otherwise shall only be processed in accordance with this policy.

In any other circumstances we will only process your sensitive personal data with your explicit consent. Where such data is processed by us on the basis of your explicit consent, you may withdraw your consent at any time: this will not affect the lawfulness of any processing based on your consent before you withdrew it.

### **3. HOW IS YOUR PERSONAL DATA COLLECTED?**

When you join an online video or voice call, your name/telephone number may be visible during the meeting or call. It is displayed/recorded to ensure we are able to identify participants, admit them to meetings and attribute comments or questions accurately.

When you join an online call with video enabled, your live image may be captured.

A recording of the meetings may be made. You will be advised where a meeting is being recorded.

When you attend an SPA event, the event may be filmed, images may be captured and those images may be published on our website.

The event organiser will notify you of this in advance. You may, at that point, exercise your right not to be filmed or photographed.

### **4. HOW WE USE YOUR PERSONAL DATA**

The Authority has a duty to be transparent and to make the information from its Board and Committee meetings available to the public, assuring it is available in formats that meet the needs of our population.

To meet this requirement the public sessions of the Authorities meetings will be livestreamed and will, thereafter, be available as video/audio files on the Authorities Website.

The SPA also promotes public engagement by publishing information on our activities on our public website, this may include images and footage of SPA events/meetings.

## **5. PURPOSES FOR WHICH WE WILL USE YOUR PERSONAL DATA**

We will only use your personal data when the law allows us to do so. The primary legal basis for processing your personal data is 'Public Task'

## **6. CHANGE OF PURPOSE**

We will only use your personal data for the purposes for which we have collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so or to gain your consent for the processing.

## **7. DISCLOSURES OF YOUR PERSONAL DATA**

From time to time we may invite you to events that we run jointly with other organisations which may be recorded. If you register for such an event then we may share the recording with that organisation.

We may use vetted agents or service providers to assist us in these activities. In these cases relevant personal data would be provided to and processed by the provider of such services, in accordance with the terms of our contract with them and to the extent appropriate for the performance of that contract.

The third parties are also required to comply with Data Protection Law.

We do not otherwise share your personal data captured during events, meetings or calls for marketing purposes.

## **8. INTERNATIONAL TRANSFERS**

We do not routinely transfer your personal data outside the United Kingdom. However, any transfers will be in accordance with relevant legislation.

## **9. DATA SECURITY**

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

In addition, we limit access to your personal data to those employees and other third parties who have the appropriate authorisation and a lawful basis to process your personal data. They will only process your

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personal data on our instructions and for the purpose the data was collected. Third parties are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

### **10. DATA RETENTION**

#### **HOW LONG WILL YOU USE MY PERSONAL DATA FOR?**

We will retain the recordings for a period of 3 years.

### **11. YOUR LEGAL RIGHTS**

You have rights as an individual under Data Protection Law in relation to your personal data:

- Request access to your personal data (a data subject access request), which enables you to receive a copy of the personal information we hold about you and the check that we are lawfully processing it (although in some cases we can refuse this request where we can claim exemptions as a data controller).
- Request correction of the personal data that we hold about you, to have any incomplete or inaccurate information corrected.
- Request erasure of your personal data, so that we delete or remove personal data where the processing would infringe the data protection principles or the controller has a legal obligation to erase the data (note: we can refuse to erase the data where we have a legitimate reason for continuing to process the data)
- Request the restriction of processing of your personal data, through the suspension of our processing, where you want us to establish its accuracy.

If you wish to exercise any of the rights set out above, please contact our DPO in the first instance at [SPAIM@spa.uk](mailto:SPAIM@spa.uk)

### **WHAT WE MAY NEED FROM YOU**

We may need to request additional information from you to help us confirm your identity and help ensure the exercise of your rights. This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to

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ask you for further information in relation to your request, to speed up our response.

### **TIME LIMIT TO RESPOND**

We are required to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated. For more information and guidance about any of these rights, please go to the website of the Information Commissioner's Office at <https://ico.org.uk/>.

### **12. COMPLAINTS**

If you are unhappy with the way in which any employee of the Scottish Police Authority has managed your personal data you may make a formal complaint to [complaints@spa.pnn.police.uk](mailto:complaints@spa.pnn.police.uk). You also have the right to make a complaint about how we have dealt with your personal data at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues (<https://ico.org.uk/>).

### **13. CHANGES TO THIS PRIVACY NOTICE**

We keep our Privacy Notice under regular review and reserve the right to update and amend it. This notice was last updated on 15 July 2024.

### **14. FURTHER INFORMATION**

For further information about any aspect of this notice please contact the Data Protection Officer, Scottish Police Authority, 1 Pacific Quay, Glasgow G51 1DZ or by email: [SPAIM@spa.police.uk](mailto:SPAIM@spa.police.uk)