

IMS Index 1.07 Scottish Woodlands Data Protection Policy

Your rights, your information and how we use it.

Scottish Woodlands is committed to protecting your personal information.

Our Privacy Notice contains important information about what personal details we collect; what we do with that information; who we may share it with and why; and your choices and rights when it comes to the personal information you have given us.

We may need to make changes to our Privacy Notice so please check our website for any updated versions.

This version of our Privacy Notice was last updated **30th August 2021**.

Who we are

We are SWL Limited (company registration no. SC274096) and its associated subsidiary companies, Scottish Woodlands Ltd and Flintshire Woodlands Ltd.

How to contact us

If you have any questions about our Privacy Notice or the information we collect or use about you, please contact;

FAO Data Protection Team
Research Park
Riccarton
Edinburgh
EH14 4AP
Email: gdpr@scottishwoodlands.co.uk

Information we collect and use

We use a variety of personal information depending on the nature of our business with you. In most cases we use only the information we require to meet our obligations under the contracts we agree with you or to meet our statutory requirements to provide information to government agencies.

Where we use your contact details to send you information about our company, we will either have a legitimate interest in doing so (e.g. to update you with news about the company and our services)

or we'll ask for your permission to do this. In either event, we'll stop this if you withdraw that consent.

Information about you that we collect, and use includes:

- Information about who you are e.g. your name, date of birth and contact details. In some circumstances we may ask for and subsequently hold some proof of identification.
- If we make payments to you, we may hold your bank account and VAT registration details.
- If you do work for us, we may hold your National Insurance number and your Tax Reference (UTR) so we can meet HMRC reporting requirements. We will also hold records of your qualifications, training and any relevant licences and insurance policies you may hold.
- Information about your contact with us e.g. meetings, phone calls, emails / letters.
- If you have a Growing Timber Insurance policy with us, we may hold a record of any historic criminal convictions or insolvencies you may have declared in accordance with the Insurer's requirements.
- Information you may provide us about other people e.g., joint applicants or beneficiaries for any Growing Timber Insurance policy you have with us. Where you provide information about other people you should tell them how Scottish Woodlands will use their personal information and get their permission to provide that information.

Where we collect your information

We generally collect your personal information directly from you, from a variety of sources, including:

- an application form, event contact card or questionnaire that you complete for us. This may be on a hard copy document, on a digital document or on a web portal.
- enquiry form completed on our website
- phone conversations with us
- emails or letters you send to us
- meetings with one of our staff members

We may also collect personal information on you from places such as business directories and other commercially or publicly available sources e.g. to check or improve the information we hold (like your address) or to give better contact information if we are unable to contact you directly.

What we collect and use your information for

We take your privacy seriously and we will only ever collect and use your personal information where it is necessary, fair and lawful to do so. We will collect and use your information only where:

- you have given us your permission [consent] to send you news and information about products and services offered by Scottish Woodlands.
- it's necessary to provide the product or service you have requested or that we have been contracted to perform.
- It's necessary for us to administer the contract we have agreed with you.
- it's necessary for us to meet our legal or regulatory obligations.
- it's in the legitimate interests of Scottish Woodlands e.g. to verify your competence to work for us or to update you with news and service information.
- it's in the legitimate interests of a third party e.g. providing information required by the Insurance underwriter for a Scottish Woodlands Growing Timber Insurance policy holder.

If you do not wish us to collect and use your personal information in these ways, it may mean that we will be unable to provide you with our products or services.

We don't use systems to make automated decisions based on your personal information.

Who we may share your information with

We may share your information with third parties for the reasons outlined in 'What we collect and use your information for.'

These third parties may include:

- Your adviser or agent
- Companies we have chosen to support us in the delivery of the products and services we offer to you and other customers e.g. consultancy or technology companies; or companies who can help us in our contact with you, for example an internet service provider
- Our regulators and Supervisory Authority e.g. the Financial Conduct Authority (FCA), the Information Commissioner's Office for the UK (the ICO)
- Our Insurance brokers who may assist us in checking your insurance details if you work for us.
- Our clients, where you may be completing work on their properties.

- Law enforcement, credit, sanctions and identity check agencies for the prevention and detection of crime
- HM Revenue & Customs (HMRC) e.g. to meet our reporting obligations in relation to monitoring for tax avoidance.

We will never sell your details to someone else. Whenever we share your personal information, we will do so in line with our obligations to keep your information safe and secure.

Where your information is processed

In most cases your information is processed in the UK and European Economic Area (EEA).

However, some of your information may be processed by the third parties we work with outside of the EEA.

Where your information is being processed outside of the EEA, we take additional steps to ensure that your information is protected to at least an equivalent level as would be applied by UK / EEA data privacy laws e.g. we will put in place legal agreements with our third party suppliers and do regular checks to ensure they meet these obligations.

How we protect your information

We take information and system security very seriously and we strive to comply with our obligations at all times. Any personal information which is collected, recorded or used in any way, whether on paper, online or any other media, will have appropriate safeguards applied in line with our data protection obligations.

Your information is protected by controls designed to minimise loss or damage through accident, negligence or deliberate actions. Our employees also protect sensitive or confidential information when storing or transmitting information electronically.

Our security controls are aligned to industry standards and good practice guidance.

How long we keep your information

We will keep your personal information only where it is necessary to provide you with our products or services while you are a customer or while you do work for us.

We may also keep your information after this period but only where required to meet our legal or regulatory obligations. The length of time we keep your information for these purposes will vary depending on the obligations we need to meet.

Your individual rights

You have several rights in relation to how we use your personal information. They are:

Right to be informed

You have a right to receive clear and easy to understand information on what personal information we have, why and who we share it with – we do this in our Privacy Notice.

Right of access

You have the right of access to your personal information. If you wish to receive a copy of the personal information we hold on you, you can make a data subject access request (DSAR).

Right to request that your personal information is corrected

If your personal information is inaccurate or incomplete, you can ask us to correct this.

Right to request erasure

You can ask for your information to be deleted or removed if there is not a compelling reason for Scottish Woodlands to continue to have it.

Right to restrict processing

You can ask that we block or suppress the processing of your personal information for certain reasons. This means that we are still permitted to keep your information – but only to ensure we don't use it in the future for those reasons you have restricted.

Right to data portability

You can ask for a copy of your personal information for your own purposes to use across different service providers.

Right to object

You can object to Scottish Woodlands processing your personal information where: it's based on our legitimate interests, for direct marketing and if we we're using it for scientific/historical research and statistics.

How to make a complaint

We will always strive to collect, use and safeguard your personal information in line with data protection laws. If you do not believe we have handled your information as set out in our Privacy Notice please let us know, providing some details to Scottish Woodlands' Data Protection Team at:

gdpr@scottishwoodlands.co.uk

Data Protection Team, Scottish Woodlands Ltd, Research Park, Riccarton, EDINBURGH EH14 4AP

T: +44(0)131 451 5154

If you are still unhappy, you can complain to the Information Commissioners Office (ICO). Their contact can be found at the following web address:

<https://ico.org.uk>