

# ILF Scotland Privacy Notice

## ILF Scotland Privacy Notice

ILF Scotland, a company limited by guarantee registered in Scotland under company number SC500075 and having its registered office at Denholm House, Ground Floor Almondvale Business Park, Almondvale Way, Livingston EH54 6GA (“we”, “us” or “our”) provide public funding to enable disabled people living in Scotland and Northern Ireland to live independently in their community. We are committed to protecting and respecting the privacy of individuals who: interact with us (whether by phone, email, in writing or via <https://ilf.scot> (our “website”)); apply for funding from us; and/or receive funding from us.

This Privacy Notice explains: the types of personal information that we collect and process in relation to our funding activities; how we obtain and use such personal information; the legal basis upon which we justify our processing of personal information; and when we may disclose such personal information to third parties.

This Privacy Notice should be read in conjunction with the documents entitled [TF13 Data Protection Policy and TF06 Managing an ILF Transition Fund Grant](#) as they provide more detailed information about how your information and data is used at different points in the funding application process. This is part of a layered approach to providing you with the right information, at the right time, about how we use and safeguard your information.

## 1. What we collect

We collect:

- personal information that you provide in relation to any inquiry or feedback that you send to us;
- personal information that you provide in the application form for the new ILF Transition Fund (and any other ILF Fund available from time to time), including, but not limited to, your National Insurance number, details relating to your receipt of Personal Independence Payments or Disability Living Allowance (if applicable), details relating to your disability or impairment and, where relevant, bank account details to pay monies to successful applicants;
- personal information, including your email address and contact preferences, that you provide to us when you sign up to use the ILF Transition Fund MyApplications service (available as from July 2018) and email alerts for account status updates;
- personal information that is captured when you sign up to use the ILF Transition Fund MyApplications service, including your IP address and details of which version of web browser you use; and
- certain non-personal information about when and how you visit and use our website.

If we do want to collect any other personally identifiable information via our website or any funding application form, we will be up front about this. We will make it clear when we collect personal information and will explain what we intend to do with it.

## 2. How we use your information

Your personal information will be used by us:

- if you have applied for an ILF Scotland Transition Fund grant, to:
  - confirm your identity; and
  - understand and evaluate your application,prior to a funding decision being made, all with a view to ensuring fair and consistent funding offers are made by us;
- to respond to any feedback you send to us, where appropriate
- to provide you with any updates or changes to your funding application and/or funding award;
- if you sign up to the ILF Transition Fund MyApplications service (available as from July 2018), to allow you use that service and to make your own changes and updates to grant transactions;
- to provide you with information about further support and services which may be of use to you, based on information you have provided to us;
- to ensure our online services work on the device that you use; and
- to understand and improve our website by monitoring how it is used.

We will not share your information with third parties for the purposes of marketing or sales.

## Our legal basis for processing your information

We consider that the provision of services by us is in the public interest. So when using personal information, our legal basis is usually that it is necessary for the performance of a task carried out in the public interest. In some situations we may rely on a different legal basis; for example, when we are using personal information

to pay a supplier, our legal basis is that its use is necessary for the purposes of our legitimate interests as a buyer of goods and services.

When we are using more sensitive types of personal information, including information relating to health and disability, we require an additional legal basis and this is usually that the use is necessary for the purposes of preventing fraud. For example, we require information relating to an applicant's health and disability in order to: (a) ensure that the awards and funding grants that we make are given to individuals who are eligible to receive them; (b) to prevent fraudulent applications; and (c) to ensure that awards and funding grants have been used for the purposes for which they have been provided by us.

## **1. Where your information is stored**

We store your personal information on secure servers in the Scottish Government network. These secure servers are located in the European Economic Area. Where we receive paper based information, this is scanned or otherwise entered onto our systems. The original paper version is retained in secure filing cabinets in a secure government building until it has been scanned or otherwise entered onto the system, and it is destroyed by shredding immediately thereafter.

## **2. When you sign up to an ILF Transition Fund MyApplications service (from July 2018)**

If you sign up to the ILF Transition Fund MyApplications service, we may contact you from time to time to ask for your feedback on how to improve the service. The ILF Transition Fund MyApplications service is managed internally by us and no third parties are involved in processing the information you provide via this service. As such, you will not receive email or marketing information from any 3<sup>rd</sup> party.

### 3. Keeping your information secure

Sending information over the internet is generally not completely secure, and we cannot guarantee the security of your data while it is in transit. As a result, any data that you send to us over the internet is sent at your own risk.

Sending information using the postal system is also not secure, and again, we cannot guarantee the security of your data while it is in transit. As a result, any data that you send to us by post is sent at your own risk.

We have procedures and security features in place to keep your data secure once we receive it. As advised in section 4 above (Where your information is stored) we store your electronic data (including data sent to us in the post, because we electronically scan such data) on secure servers in the Scottish Government network.

### 4. Disclosing your information

In many circumstances, individuals will be in receipt of further support from health and social services, schools and education providers and their local authorities. We will only contact these other organisations if there is a requirement to obtain further information about you for the purposes of processing a Funding application that you have submitted to us or to confirm current levels of benefits and support packages (with the local authority) provided to you.

We have a formal data sharing agreement with the Department for Work and Pensions (DWP) and Her Majesty's Revenues and Customs (HMRC) for the purposes of identity verification and benefits checking, where such verification and checking is required in connection with any Funding application that is submitted to us. The data sharing agreement requires us and both the DWP and the HMRC, as applicable, to keep information received confidential and secure and to only use the

information for its intended purpose and in compliance with data protection legislation.

In addition, in some circumstances we may pass on your personal information where we have a legal obligation to do so, if there is a legitimate interest in providing this information to the third party, or if we have to enforce or apply our terms and conditions and other agreements. This includes exchanging information with other government departments for legal reasons.

Further information is contained in the [TF13 Data Protection Policy and TF06 Managing an ILF Scotland Transition Fund Grant](#).

We will not share your information with any other organisations for marketing, market research or commercial purposes, and we do not pass on your details to other website providers.

## 5. Your rights

You can ask us at any point what information we hold about you. You may also ask us to remove this information from our servers or not to use this information. However, please note that we may not always be able to comply with such a request, depending on the nature of your request but in such circumstances will let you know why we cannot comply with your request. For example, if you have received an award or funding grant from us, we need to retain this information for 6 years for our financial records and tax purposes and will not be able to remove it during this period of time.

After 25<sup>th</sup> May 2018, you will have additional rights and protections under the new General Data Protection Regulations and ILF Scotland will inform you of any changes to your rights and how we use and protect your information.

## 6. Links to other websites

Our website contains links to other third party websites. We have no control over the contents of those sites, and we accept no responsibility for them or for any loss or damage that may arise from your use of them. The operators of other sites may collect information from you, which will be used by them in accordance with their own data protection or privacy policy. This Privacy Notice applies only to us, the services that we provide and to our website. We are not responsible for the privacy practices within any other organisation or website. You should always be aware of this when you leave our website and we encourage you to read the privacy statement on any other website that you visit.

## ILF Scotland Cookies Policy

### 7. How cookies are used on our website

Our website puts small files (known as ‘cookies’) onto your computer to collect information about how you browse and use our website. Most internet browsers allow users to change their settings and turn off certain cookies. However, please be aware that turning cookies off may reduce some of the tracking services and functionality which our website and the new ILF Transition Fund MyApplications service (available as from July 2018) can provide. Please also note that each return visit to our website will be seen as a new visit with previous visit status and cookie preference choices lost. Your cookie preferences are a matter for you to decide and your decision will not impact or influence how ILF Scotland processes your information or application. However, please be aware that your cookie preferences may reduce our ability to send you email alerts via the ILF Transition Fund MyApplications service but you would still receive emails directly to your personal email address if you have stated this as a preferred method of contact.

We use cookies to:

- understand your preferences when using our website;
- measure how you use our website so it can be updated and improved based on your needs;
- remember the notifications you have seen so that we do not show them to you again;
- identify unique and returning visitors to our website; and
- identify where people are visiting our website from (i.e. directly from their own device or via linked sites).

**Cookies on our website are not used to identify you personally.**

When the new ILF Transition Fund MyApplications service is made available as from July 2018, we will store cookies on your device to enable the ILF Transition Fund MyApplications service to function for you. This will enable you to start the process of completing an application, to save it and to then return to complete the application at a later time. When you return, the presence of the cookie on your device will allow you to return to the point in your application process where you last left it. However, if you choose not to allow cookies to be placed on your device, you will simply have to navigate through all the previously saved pages to get to the one you left.

We will not provide a cookie alert for this as it is essential to the normal functioning of the ILF Transition Fund MyApplications service when it goes live in July 2018.

## **8. Measuring website usage (Google Analytics)**

We use Google Analytics to help make sure our website is meeting the needs of its users and to help us make improvements, for example, improving our website's search facility. Google Analytics works by placing a number of cookies (as detailed in section 12 below (Google Analytics)) on your computer.

Google Analytics stores information about:

- the pages you visit on our website;
- how many times people download forms and information sheets from our website;
- how long you spend on each page of our website;
- how you got to our website; and
- what you click on while you are visiting our website.

The Google Analytics software does not collect or store your personal information (for example your name or email address), so the information that is collected using the Google Analytics software cannot be used to identify who you are. It does collect your unique IP Address to count the number of times you visit our web pages and access the documents but there is no corresponding link to your personal identity. It lets us know how the website is being used, not who is using it.

**We do not allow Google to use or share our analytics data with any third party and only named ILF Scotland staff members have access to the analytics reports for usage and service improvement requirements as described above.**

Use of our website without amending your cookie preference to disable the cookies relating to Google Analytics indicates that you accept our use of these cookies in connection with your visit to our website.

Further information on the use of cookies, and turning them off, is contained in the section 11 above (How cookies are used on our website).

## 9. Google Analytics

If you allow them, Google Analytics places the following cookies on your computer:

Name	Purpose	Expires
_ga	This helps us count how many people visit ilf.scot by tracking if you've visited before	2 years
_gid	This helps us count how many people visit ilf.scot by tracking if you've visited before	24 hours
_gat	Used to manage the rate at which page view requests are made	10 minutes
_utma	Like _ga, this lets us know if you've visited before, so we can count how many of our visitors are new to ilf.scot or to a certain page	2 years
_utmb	This works with _utmc to calculate the average length of time you spend on ilf.scot	30 minutes
_utmc	This works with _utmb to calculate when you close your browser	when you close your browser
_utmz	This tells us how you reached ilf.scot (for example from another website or a search engine)	6 months

## 10. Your right to complain

If you are unhappy with how we are using personal information about you please contact **Data Protection Officer** at **Independent Living Fund Scotland, Ground Floor, Denholm House, Almondvale Business Park, Almondvale Way, Livingston, EH54 6GA** (telephone 0300 200 2022 or email [dpo@ilf.scot](mailto:dpo@ilf.scot)).

You also have the right to complain about how we use personal information to the Information Commissioner's Office (ICO). Details about this are on their website at [www.ico.org.uk](http://www.ico.org.uk).