

# PRIVACY STATEMENT, WEBSITE PRIVACY POLICY, AND INFORMATION USE AND PRIVACY POLICY

## INTRODUCTION

On these pages you will find details of Glasgow Life's [Privacy Statement](#) - how we collect information and what we do with it which is guided by our approved high level [Information Use and Privacy Policy](#) and our [Website Privacy Policy](#) which details how we operate our websites.

**Privacy Statement:** this is how we generally use information collected or obtained for various Glasgow Life services (being updated on an ongoing basis).

**Website Privacy Policy:** this is how we operate our websites we control and how we handle any personal information collected or obtained through our websites. It also covers the use of Cookies and other technologies on our sites.

**Information Use and Privacy Policy:** these are our high level principles about how we use personal information we have collected or obtained that informs our policies and procedures.

You can read our [Disclaimer](#) which relates to content on websites we may link to, but do not operate.

You can also view our [Copyright Statement](#) which relates to information on this site (and our other sites we operate) and our policy on reproducing any of that information.

You can also view our [Policy on Re-Use of Public Sector Information](#) which relates to information held by Glasgow Life which is available for reuse by the public and the conditions which will apply to such re-use.

If you want to see how Glasgow Life treats any information you submit via our websites or how cookies and other technologies are used, please view our [Website Privacy Policy](#) and [Information on Cookies](#).

## PRIVACY STATEMENT

This page tells you how Glasgow Life uses your personal information. It was last updated on 18 November 2018.

### THE SHORT VERSION:

This privacy statement is the privacy notice for all Glasgow Life services. We will use your details to provide you with the service(s) which you or someone else (with your consent) have asked us to provide. We will also use your personal details for purposes of crime prevention and crime detection and/or when required by law and will share it with other public bodies for that purpose.

### THE LONGER VERSION:

Culture and Sport Glasgow is a Scottish charity (No SCO37844) incorporated under the Companies Acts and limited by guarantee, registered in Scotland with Company No SC313851 having its registered offices at 220 High Street, Glasgow G4 0QW and operating under the name "Glasgow Life" ("CSG"). CSG is registered with the Information Commissioners Officer ("ICO") under Notification No. Z9838695.

Culture and Sport Glasgow (Trading) CIC ("CSG CIC") is a trading subsidiary of CSG. CSG CIC, a community interest company, is registered in Scotland with Company No SC313850 having its registered offices at 220 High Street, Glasgow G4 0QW and registered with the ICO under Notification No. Z9838741

CSG and CSG CIC are collectively referred to by CSG's operating name "Glasgow Life" ("we" or "us") for the purposes of this Privacy Statement.

In terms of the Data Protection Act 1998, Glasgow Life is the data controller of any personal information provided to or gathered by us.

Glasgow Life's approved Information Use and Privacy Policy sets out the high level principles we adhere to when using an individual's personal data. This privacy statement describes how we presently translate those principles into practice in terms of what we will and will not do with the information we hold about you. It sets out the general

approach we take, in each case with additional information relating to particular areas of our activity.

## GENERAL APPROACH

Glasgow Life does not sell or rent your personal details to any external organisations.

For most purposes, we will only process your information with your consent. In most cases, we will presume that by providing us with your details in order to obtain a service from Glasgow Life, you are consenting to us using those details in order to provide that service to you. Except as set out in this privacy statement, we will not use your personal details for any other purpose without first obtaining your consent to that other purpose or purposes (you may have been asked to provide this additional consent at the time when you originally contacted us, for example in an additional section on an application or other form).

The main exception to the rule that we will not use your details for other purposes relates to the prevention of fraud. Glasgow Life is under a legal obligation to safeguard public funds and so in all cases we reserve the right to check the information you have provided for accuracy or in order to detect fraud. This may involve data matching exercises where we compare different sets of data which we hold (or share with or are shared from other agencies, including Glasgow City Council ("the Council")) for unusual matches or discrepancies; this may also include matching our data with external data sources such as information held by credit reference agencies.

We also participate in anti-fraud data matching exercise carried out by other agencies such as the National Fraud Initiative (operated on behalf of Audit Scotland) and the Housing Benefit Matching Service (conducted on behalf of the Department for Work and Pensions). We have a duty to manage public funds properly. As a result, we will use the information you provide to make sure all amounts we are owed are paid on time (for example, by identifying people who have not paid Glasgow Club fees). In relation to outstanding money owed, we may also share your information with Debt Management Partners and the Courts. We may also share your information for the same purposes with other public organisations, including the Council, neighbouring councils that handle public funds, and with the Police. We may also share your details with other organisations, including credit reference agencies, for the purposes of prevention and detection of fraud and confirming who is living at a particular address.

By law we are obliged to provide information to certain other public bodies such as the Department for Work and Pensions, HM Revenues and Customs, courts, tribunals, hearings and other formal bodies dealing with legal processes, and various external regulatory bodies. We also have an obligation to assist in the prevention of crime and we

will therefore generally supply specific information which we are asked to provide to the police or other crime detection agencies, provided we are satisfied that the request is connected to an investigation and that disclosure would be lawful and proportionate.

We work closely with a large number of other public bodies, for example with the Council. Information will generally only be shared with these partner bodies with your consent and you should always be made aware when services are to be provided to you on a joint basis.

External contractors are appointed to process information on behalf of Glasgow Life and under its instructions. All contractors which do this are appointed under written contracts requiring them to keep the personal information safe and prohibiting them from doing anything with the personal data they process for us other than following Glasgow Life's instructions.

Glasgow Life carries out statistical analyses of the information which it holds in order to monitor its performance in various areas and in order to improve service delivery. These anonymised statistics, once they cannot identify any individuals, may be published or shared with other organisations or individuals. Glasgow Life also conducts research and assists other bodies to conduct research using the information we hold. If an individual elects to make public statements relating to Glasgow Life and Glasgow Life holds information showing that these statements are incorrect, we may publicise the fact that we hold information contradicting that version. We may also seek your consent to publish the contradictory information; if you decline to give us this consent, we may make your refusal of this consent public.

---

## USE AND DISCLOSURE OF STAFF INFORMATION

Staff information is primarily held by Glasgow Life in order to carry out its duties as an employer. In connection with this we hold information on staff relating to ethnic background, disability etc. in order to comply with our obligations relating to monitoring equality of opportunities and discrimination legislation. Where applicable we will hold information on trade union membership to allow for payment of union subscriptions deducted from pay and will share this information with the relevant unions to allow union these subscriptions to be collected. We also share information where applicable with other recipients of payroll deductions such as Glasgow Credit Union or suppliers of salary sacrifice schemes such as child care voucher providers. Earnings information is supplied to HMRC as required by law to allow for deduction of PAYE and national insurance contributions.

Staff information is used internally for data matching exercises to prevent and detect fraud, particularly in connection with benefits administration and collection of council tax, and will be shared with external bodies including the National Fraud Initiative in Scotland and Housing Benefit Matching Service run by the Department for Work and Pensions for the same or similar anti-fraud purposes. Statistical analysis of employee information is carried out to support business management forecasting and workforce planning. Information will generally be released to the police and other criminal investigation agencies on request in relation to specific investigations; provided Glasgow Life is satisfied that legitimate grounds exist for doing so. It will also be released to government agencies able to compel disclosure such as the Child Support Agency if we receive an appropriate request. Information will be released to courts and employment tribunals in relevant cases and may be shared with external legal advisers in these cases. It will also be released in response to an order from a court with competent jurisdiction to make such an order. It may also be released (without consent) in response to investigations by external regulators such as Audit Scotland, the UK and Scottish Information Commissioners and Scottish Public Services Ombudsman.

The Council also holds information on behalf of, and as a data processor for Glasgow Life. Glasgow Life is responsible for determining how to use such information, including making decisions on whether to release it. The Council may be required to release such information in response to a court order even where it holds it on behalf of Glasgow Life; Glasgow Life will be informed of any such court orders. Information relating to staff disciplinary cases will be shared between the Council and Glasgow Life, where relevant, such as where someone is employed by both the Council and Glasgow Life. Where relevant, information acquired by investigatory sections within Glasgow Life will be shared with the Council and Glasgow Life may also receive similar information from the Council.

If Glasgow Life receives a freedom of information ("FOI") request which includes information relating to staff, then as a general rule such requests will be refused (or the staff information removed/redacted from the response) unless it relates to more senior members of staff. For this purpose, staff on grade 9 or above (defined by Glasgow Life as its leadership grades) count as more senior staff, those on lower grades do not. However, each request will be considered on its own merits and in line with guidance issued by the Information Commissioner and Scottish Information Commissioner. Even for more senior staff, we will not release information which does not directly relate to that member of staff's work activities, so information such as home address will not generally be released. Staff will be consulted ahead of any decision to release their personal data in response to an FOI request. The same principles apply to

information relating to former members of staff (subject to the caveat that Glasgow Life may be unable to readily contact such individuals to seek their views on disclosure and will generally reach a decision without making contact).

## INFORMATION SHARING WITH THE COUNCIL AND ARMS LENGTH

### EXTERNAL ORGANISATIONS

The Council has established a network of wholly and partly owned Arms Length External Organisations (“ALEOs”) which now provide services to and on behalf of the Council. Each of these is registered as a data controller in its own right and has its own privacy statement describing how it uses personal information. While ALEOs have operational independence from the Council, it is expected that their privacy statements and policies will align to those of the Council.

In order to provide services, it is necessary at times for Glasgow Life to share information with the Council and, potentially, its ALEOs. Each ALEO will generally act as a data controller of information it needs to provide these services although in some cases (most notably for Service Glasgow LLP, trading as ACCESS, which provides IT services to the Council) the ALEO will be acting as a data processor to the Council, with the Council remaining responsible for decisions on how and why information is processed. Service users should be informed whenever their information will be passed to the Council or an ALEO (other than one acting as a data processor on behalf of Glasgow Life) and their consent sought for this in most cases. Glasgow Life, the Council and its ALEOs will share information with each other without consent for purposes related to the prevention and detection of fraud or other crime, and some staff information may also be shared without consent (see the section on Use and Disclosure of Staff Information above for more information on this). Some information relating to service users will also be passed to the Council in order to allow the Council to monitor the activities of Glasgow Life, although where possible this will be done using aggregated and anonymised information.

The Council also acts as a data processor on behalf of Glasgow Life in relation to back office functions such as payroll and other HR services. In these cases, Glasgow Life remains responsible for determining how to use such information, including making decisions on whether to release it. The Council may require to release such information in response to a court order even where it holds it on behalf of Glasgow Life; Glasgow Life will be informed of any such court orders.



## MEDIA ENQUIRIES

Glasgow Life has a press office and deals with significant amounts of queries from the press and media.

In responding to these queries, our press officers apply the same rules as all other officers of Glasgow Life and will only release information about individuals in line with this privacy statement and Glasgow Life's approved [Information Use and Privacy Policy](#). In terms of this approach, personal information held by Glasgow Life will only be released to the media if there are compelling reasons for doing so.

If it appears to us that a journalist is in full possession of the facts regarding a particular issue, then Glasgow Life may, where appropriate, confirm to the journalist that the story is indeed correct (or we will correct any inaccuracies, provided that the inaccuracies are not so large as make us reasonably suspect that the journalist is merely guessing what has happened and does not have all the information.) We will not, as a general rule, release personal data where the journalist is merely speculating as to what might have happened. However if a member of the public approaches the media about an issue relating to Glasgow Life, it is assumed that they are willing to have their case dealt with publicly and Glasgow Life will respond accordingly.

If an individual elects to make public statements relating to Glasgow Life and Glasgow Life holds information showing that these statements are incorrect, we may publicise the fact that we hold information contradicting that version. We may also seek the consent of that person to publish the contradictory information; if they decline to give us this consent, we may make their refusal of this consent public.

## CCTV

Glasgow Life's properties are covered by a variety of CCTV (closed circuit television) systems. These systems are designed primarily to protect the buildings from theft or vandalism; some systems are also intended to help protect staff.

Many of the cameras are connected to an alarm receiving centre operated on behalf of Glasgow Life by Community Safety Glasgow. Community Safety Glasgow do not use the footage from these cameras for any purpose other than to assist Glasgow Life in safeguarding its property and protecting the people within the buildings in question, and Glasgow Life remains data controller of this information. Glasgow Life-operated CCTV systems are all clearly labelled with distinctive black on yellow signage with the image of a CCTV camera, Glasgow Life's mark, and the caption "Preventing Crime. Promoting public safety."

Glasgow life has adopted a CCTV policy that stipulates that CCTV Recordings ("Recordings") will normally be retained for a period of 7 days, unless there is a particular reason for specific Recordings to be retained for longer. There is, however, an exception to this policy for museums (and some other sites), for which Recordings will normally be retained for 31 days. It is therefore important that there are no unnecessary delays in processing requests for Recordings to ensure they are not deleted in the period between the request being received and actioned.

Where a request for Recordings is received within the normal retention period the individual must provide sufficient information to enable the Recordings to be located i.e. location of camera and date of recording. The individual should also be informed that a fee of £10 may be charged (this is not refundable even if no Recordings are located). Where the individual has been asked to make their request in writing or provide proof of identification, they should be informed that, as the normal retention period for Recordings is 7 days (or, in the case of museums and some other sites, 31 days), the Recordings will be kept for a further 14 days only from the date of the request for identification. Failure to submit a valid subject access request with the necessary identification within 14 days will result in the Recordings being wiped.

An individual has a right of access to their own personal data but does not have any rights to Recordings of other individuals. Therefore any images or data relating to other individuals captured in the same Recordings must be digitally removed by pixellation or blurring of the images. External companies normally carry this out and payment for this is the responsibility of Glasgow Life.

Police officers or the courts may request access to Recordings for evidential purposes. The courts are not required to complete a form demonstrating the right to request the footage although police officers are required to complete and submit Glasgow Life's standard Section 29 Release form for approval before they will be given consent to view or remove Recordings. The relevant Glasgow Life staff member will determine whether or not they are satisfied that the justification provided by police officers is sufficient to allow access to the Recordings.

All queries regarding public space CCTV should be directed to Community Safety Glasgow.

## YOUR RIGHTS UNDER THE DATA PROTECTION ACT 1998

You have a number of Rights under the Data Protection Act 1998 ("the DPA") in regards to how your data is processed. As a minimum you should be given 'fair processing' information which is sometimes referred to as a 'privacy' notice or statement. Glasgow Life's online 'privacy statement' constitutes our general approach to how we process personal information in accordance with our approved Information Use and Privacy Policy. There may be other more specific privacy notices or statements you will have been given or made readily available for a service you are obtaining from us, e.g. in an online or offline form, public notice or orally, etc. You have the following fundamental rights in respect to how your data is being processed:-

### SUBJECT ACCESS REQUESTS (REQUESTS FOR COPIES OF YOUR PERSONAL DATA THAT WE HOLD)

- The right to request (in writing) a copy of your personal data held by us, given to you in a permanent form. You are entitled to be given if requested:
  - A description of the personal data being processed
  - A description of the purposes for which it is being processed
  - A description of any likely recipients
  - Any information on the source of this data
  - Where any automated decisions have been taken, the 'logic' behind these decisions

### AUTOMATED DECISIONS

- You have the right, by notice, to prevent any automated decisions.

### DIRECT MARKETING

- You have the right to request in writing to cease, or not begin, processing of your personal data, for the purpose of direct marketing.

## PREVENTING PROCESSING

- You have a right to request to cease processing personal data if you believe it would cause you 'damage' or 'distress'.

## RECTIFICATION, BLOCKING, ERASURE & DESTRUCTION

- By order of a court, you have the right to have any inaccurate personal data or expression of opinion which appears to be based on that inaccurate data, to be rectified, erased, blocked or destroyed.

## COMPLAINTS TO THE COMMISSIONER

- You have the right to ask the Information Commissioner to carry out an 'assessment' of the processing of your personal data if you believe it directly affects you (causes 'damage' or 'distress') to determine whether the processing is undertaken in accordance with the law.

## COMPENSATION FOR DAMAGE/DISTRESS

You may be entitled to compensation if you suffer 'damage' or 'distress' as a result of a contravention of any provision of the Data Protection Act 1998 in regards to the processing of your personal data.

## HOW DO I MAKE A SUBJECT ACCESS REQUEST?

You must:

- make the request in writing (you can use our form [here](#))
- supply information to prove who you are (to eliminate risk of unauthorised disclosure)
- supply appropriate information to help us to locate the information you require.

The request should include details and provide evidence of who you are (e.g. driving licence, passport, birth certificate, utility bills). You should also provide as much detail as

possible regarding the information you wish to access (e.g. where and by whom information is believed to be held, specific details of information required).

This list is not exhaustive and other forms of identification may be acceptable. At least one form of identification should contain the same signature that is on your application form or letter and one must include a photograph. Please note that Glasgow Life will not be able to comply with any requests received unless satisfactory proof of identification is provided.

You can attend the Mitchell Library (Tel: 0141 287 2999, address below) with your original documents and we will be happy to take copies while you wait. If you would prefer to send us copies of your documentation, please provide us with certified copies to either address below. A professional person or someone well respected within your community, such as a solicitor, social worker, teacher or police officer, can certify documents by signing and dating them.

You are not required to state WHY you wish to access the information: the details we require are merely those that will aid the efficient location and retrieval of information.

Once we receive a Subject Access Request, all efforts will be made to fully comply within 40 days. In any event, you will receive all the information that has been located and can be released within 40 days and an explanation for any information that cannot be provided at that time.

Upon receipt of a request, we must provide:

- information on whether or not the personal data are processed
- a description of the data, purposes and recipients
- a copy of the data
- an explanation of any codes/jargon contained within the data.

We must respond to Subject Access Requests within 40 days.

Make a request in writing to:

**DATA PROTECTION AND INFORMATION RISK OFFICER,**

**Glasgow Life,**

**220 High Street,**

**Glasgow G4 0QW**

**OR**

**FAO: DATA PROTECTION AND INFORMATION RISK OFFICER**

**Glasgow Libraries,**

**The Mitchell Library,**

**North Street,**

**Glasgow G3 7DN**

*(If you would like to bring your documentary evidence in person rather than post certified copies an address above, you can take them to the Mitchell Library to be copied)*

## WEBSITE PRIVACY POLICY

You may also wish to read our [Privacy Statement](#)

Our websites are operated and controlled by Culture and Sport Glasgow, a Scottish Charity (No SCO37844) incorporated under the Companies Acts and limited by guarantee (Registered Company No SC313851), having its registered office at 220 High Street, Glasgow G4 0QW and operating under the name 'Glasgow Life'.

In terms of the Data Protection Act 1998, Culture and Sport Glasgow (referred to in this privacy policy as "Glasgow Life", "we" or "us") is the data controller of personal data (information relating to identifiable living individuals) collected or obtained by or through our websites.

Any personal data collected through our websites will be treated as confidential under the principles of the Data Protection Act 1998.

Glasgow Life is registered under the Data Protection Act 1998 and as a data controller (notification number Z9838695); the register entry can be inspected at [www.ico.org.uk](http://www.ico.org.uk)

Our websites do not automatically capture or store personal information, other than logging the user's IP address and session info such as the duration of the visit and the type of browser used. This is recognised by the Web server and is only used for system administration and to provide statistics which Glasgow Life uses to evaluate use of the site.

You will be asked to provide some personal information if you wish to register with our websites and take advantage of the additional features that registered users can access. This information will be restricted to details which may help us provide better services to you through our websites. Our registration process includes, but is not limited to, the following: your name, address, telephone contact number and e-mail address (this may vary depending on the nature of the services you are registering for). By providing this information you consent to Glasgow Life using these details to help provide you with services, answers to queries or information about events and other programmes which may be of interest to you as appropriate. All marketing information will include an option for you to opt out of any future, similar correspondence. We do not contact children under 12 without the consent of a legal parent or guardian.

You will be required to agree to Glasgow Life using your details in this way when you complete the registration process. Similarly, if you wish to contact Glasgow Life through



our websites you may be asked to provide some limited personal information to enable us to respond to your question or comment. Comments may be submitted without providing personal details - we will not, however, be able to respond to you unless you provide a means of contact. You do not need to provide us with personal information simply to browse the site.

---

## INFORMATION SECURITY

We believe that keeping personal information secure is one of our most important responsibilities.

We maintain all necessary physical, electronic and procedural security to help safeguard personal, sensitive and payment data against loss, misuse or alteration. Third parties that provide us with support or services may also receive personal, sensitive or payment information, and we require them to maintain security measures similar to ours with respect to such information.

When we request customers to enter sensitive information via a form on a web page we operate, such as credit card number, it is encrypted and protected with SSL encryption and processed through a reputable payment processor.

While on a secure page, such as our customer data capture forms, the lock icon at the bottom or top of web browsers, e.g. Mozilla Firefox or Microsoft Internet Explorer, becomes locked, as opposed to unlocked or open, when you are just 'surfing'.

While every effort is made by us to secure transmission of data eg using SSL we cannot be held responsible for the security of your data while it is being transmitted over the internet and through servers that are out of our control. We strive to protect your personal information but we cannot ensure or warrant the security of any information you transmit to our website or services. Any data transmissions you make over the internet are done so at your own risk. Once we receive your data transmission, we make are responsible for ensuring the security and privacy of your personal data on our systems.

---

## EMAIL NEWSLETTERS

We offer an email newsletter service (subscription service via our websites and other available external channels e.g. online or offline application form, etc), which is provided to inform you about selected services and offers we make available. Users can subscribe through our online automated process (or our other offline communication channels) should they wish to do so but do so at their own discretion.

Subscriptions to our email campaign newsletters are taken in compliance with the Privacy and Electronic Communications Regulations 2003 (as amended). All personal details relating to subscriptions are held securely and in accordance with the Data Protection Act 1998. No personal details are passed on to third parties (except our approved contracted email service provider; with your explicit consent; or where required or permitted by law) nor shared with companies / people outside of Glasgow Life. Under the Data Protection Act 1998 you may request a copy of personal information held about you here.

Email marketing campaigns published by Glasgow Life contain tracking facilities within the actual email. Subscriber activity is tracked and stored in our Customer Relationship Management system which manages our email newsletter campaigns for future analysis and evaluation. Such tracked activity may include; the opening of emails, forwarding of emails, the clicking of links within the email content, times, dates and frequency of activity. This information is used to refine future email campaigns and supply the user with more relevant content based around their activity.

In compliance with the Privacy and Electronic Communications Regulations 2003 (as amended) subscribers are given the opportunity to un-subscribe at any time through an automated system. This process is detailed at the footer of each email campaign.

---

## SOCIAL MEDIA PLATFORMS (FACEBOOK, TWITTER, ETC)

Communication, engagement and actions taken through external social media platforms that we utilise, and users participate on, are bound to the terms and conditions, and the privacy policies held with each social media platform respectively.

Users are advised to use social media platforms wisely and communicate / engage upon them with due care and caution in regard to their own privacy and personal details. We will never ask for personal or sensitive information through social media platforms, and

encourage users wishing to discuss sensitive details to contact us through our standard primary communication channels, such as by telephone or in writing.

Some of our websites use social plugins which help share web content directly from web pages to the social media platform in question. Users are advised before using such social plugins we utilise that they do so at their own discretion and note that the social media platform may track and save your request to share a web page respectively through your social media platform account.

---

## PAYMENT FACILITIES

If you use the online payment facilities offered on any of our websites, the details you provide will be stored on a secure server operated by Glasgow Life's online banking partner. Glasgow Life does not have access to these details. The banking partner will only inform Glasgow Life about the identity of the person making payment and the nature of the payment.

---

## UNDER 12

If you are aged 12 or under, please get your parent or guardian's permission before you provide personal information on any of our websites.

---

## CONTENT ACCURACY ON OUR WEBSITES

The information provided on our websites is believed to be accurate at the time of writing but Glasgow Life accepts no liability for the contents and anyone relying on these contents does so at their own risk. Nothing on our websites is to be construed as binding Glasgow Life or constituting an offer on behalf of Glasgow Life.

---

## SCOPE OF POLICIES

This privacy policy only covers the Glasgow Life website at [www.glasgowlife.org.uk](http://www.glasgowlife.org.uk) (and the other websites operated or managed by us where they link back to this privacy policy) Links within this site to other websites are not covered by this policy and individuals should check the terms of the privacy policy of those other sites for their terms. Glasgow Life is not responsible for the content of external websites.

---

## LIST OF OUR WEBSITES WE OPERATE OR MANAGE

Glasgow Life operates a number of websites and use social media platforms that may refer back to this privacy statement. The websites we currently manage include:

1. Glasgow Life – [www.glasgowlife.org.uk](http://www.glasgowlife.org.uk)
2. Celtic Connections – [www.celticconnections.com](http://www.celticconnections.com)
3. Aye Write – [www.ayewrite.com](http://www.ayewrite.com)
4. Merchant City Festival – [www.merchantcityfestival.com](http://www.merchantcityfestival.com)
5. Glasgow Mela – [www.glasgowmela.com](http://www.glasgowmela.com)
6. World Pipe Band Championships – [www.theworlds.co.uk](http://www.theworlds.co.uk)
7. Glasgow Loves Christmas – [www.glasgowloveschristmas.com](http://www.glasgowloveschristmas.com)
8. Tramway – [www.tramway.org](http://www.tramway.org)
9. Emirates Arena – [www.emiratesarena.co.uk](http://www.emiratesarena.co.uk)
10. Glasgow Concert Halls – [www.glasgowconcerthalls.com](http://www.glasgowconcerthalls.com)
11. Tickets Glasgow – [www.ticketsglasgow.com](http://www.ticketsglasgow.com)
12. Glasgow Venue Hire - [www.glasgowvenuehire.org.uk/](http://www.glasgowvenuehire.org.uk/)
13. Altogether Glasgow - [www.altogetherglasgow.com](http://www.altogetherglasgow.com)
14. Family History – [www.glasgowfamilyhistory.org.uk/](http://www.glasgowfamilyhistory.org.uk/)
15. Velocity - [www.velocityglasgow.org.uk/](http://www.velocityglasgow.org.uk/)
16. Glasgow Club - [www.glasgowclub.org](http://www.glasgowclub.org)
17. Glasgow Club bookings - [www.qcbooking.glasgowcitycouncil.co.uk](http://www.qcbooking.glasgowcitycouncil.co.uk)
18. Glasgow Club social media posts - [www.glasgowsporthub.com](http://www.glasgowsporthub.com)
19. Glasgow Museums Collections Navigator – <http://collections.glasgowmuseums.com>
20. Glasgow Life Photo Library – [www.csimages.org.uk](http://www.csimages.org.uk)
21. Glasgow Life Virtual Mitchell – [www.mitchelllibrary.org](http://www.mitchelllibrary.org)
22. Glasgow Libraries Catalogue – <http://libcat.csglasgow.org>
23. Kelvin Hall – [www.kelvinhall.org.uk](http://www.kelvinhall.org.uk)
24. People Make Glasgow - <https://peoplemakeglasgow.com>
25. Glasgow Convention Bureau - <https://glasgowconventionbureau.com/>

26. Glasgow Tourism and Visitor Plan - <http://www.glasgowtourismandvisitorplan.com/>

The above list may be amended or added to from time to time to take account of changes in the websites we operate and/or manage.

---

#### DOMAIN NAMES WE OWN

There are a number of domain names we manage that also refer back to our main website at: [www.glasgowlife.org.uk](http://www.glasgowlife.org.uk)

---

#### CHANGES TO THIS WEBSITE PRIVACY POLICY

Any changes to this Privacy Policy will be posted on our websites (at [www.glasgowlifeorg.uk](http://www.glasgowlifeorg.uk)).

## COOKIES

### WHAT IS A COOKIE?

Cookies are small data files which are placed on your computer, mobile or other handheld devices as you browse through our websites. On our websites, cookies are used to remember information about your browsing history, for example, the on-line resources you use, the pages you visit and how often you visit them.

#### Types of cookies

- 'Session' cookies remain in your browser during your browser session only, ie until you leave the website.
- 'Persistent' cookies remain in your browser after the session (unless deleted by you).
- 'Performance' cookies collect information about your use of the website, such as webpages visited and any error messages; they do not collect personally identifiable information, and the information collected is aggregated such that it is anonymous. Performance cookies are used to improve how a website works.
- 'Functionality' cookies allow the website to remember any choices you make about the website (such as changes to text size, customised pages) or enable services such as commenting on a blog.

### HOW WE USE COOKIES ON OUR WEBSITES

Our websites uses cookies to help improve the users experience while visiting our websites. Where applicable our websites use a cookie control system allowing the user on their first visit to the website to allow or disallow the use of cookies on their computer / device. This complies with recent legislation requirements for websites to obtain explicit consent from users before leaving behind or reading files such as cookies on a user's computer / device.

Our websites use cookies to collect anonymous information about how well the site is performing via Google Analytics.

Some of our site(s) also uses Google Remarketing cookies to provide us with information on visitor demographic and interests, and Facebook cookies, which are used to deliver relevant adverts to Facebook users. We may also use Facebook pixels to learn whether someone who has seen an ad on Facebook has later visited our website as well as

Twitter widgets to tailor the content of our site with recent Twitter feeds. We do not use cookies which collect data that makes your personally identifiable, or that collect any personal information without your express permission to do so.

---

## GOOGLE ANALYTICS

**Please note** – We do not collect personal information via Google Analytics.

Our websites use Google Analytics, a web analytics service provided by Google, Inc. 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA ("Google").

Google Analytics uses "cookies", which are text files placed on your computer, to help the website analyse how users use the site. The information generated by the cookie about your use of the website (including your IP address) will be transmitted to and stored by Google on servers in the United States.

Google will use this information for the purpose of evaluating your use of our websites, compiling reports on website activity for website operators and providing other services relating to website activity and internet usage. Google may also transfer this information to third parties where required to do so by law, or where such third parties process the information on Google's behalf.

Google will not associate your IP address with any other data held by Google.

You may refuse the use of cookies by selecting the appropriate settings on your browser, however please note that if you do this you may not be able to use the full functionality of our websites.

By using our websites, you consent to the processing of data about you by Google in the manner and for the purposes set out above.

---

## FACEBOOK

**Please note** – We do not collect personal information via Facebook.

Our websites use Facebook plugins and pixels provided by Facebook Inc., 1601 S. California Avenue, Palo Alto, CA 94304, USA ("Facebook").

We sometimes use Facebook plugins and pixels on our websites, however we do not store this information; it is stored by Facebook. The information is stored in such a way that information about individuals is not tracked, nor can individuals be targeted directly.

For the information on the purpose and scope of data collection and processing by Facebook, as well as your rights in this respect and settings options for protecting your privacy please visit Facebook's privacy policy: <http://www.facebook.com/policy.php> or <https://www.facebook.com/about/privacy/advertising>.

---

## TWITTER

**Please note** - We do not collect personal information via Twitter.

Our websites use Twitter widgets, a social plugin service provided by Twitter, Inc., 1355 Market Street, Suite 900, San Francisco, CA 94103, USA ("Twitter").

We sometimes use Twitter widgets on our websites, however we do not store this information; it is stored by Twitter. The information is processed in such a way that information about individuals is not tracked. The Twitter website widget is a social plugin that enables us to tailor content on our site(s), either by one or more of the following Twitter plugin features:

- showing recent tweets on our site(s)
- showing followers and counts
- showing interactive follow button
- help tailor content and suggestions

For the information on the purpose and scope of data collection and processing by Twitter, as well as your rights in this respect and settings options for protecting your privacy please visit Twitter's links below:

[Twitter supports Do Not Track](#)

[About tailored suggestions](#)

[Twitter's use of cookies and similar technologies](#)

[Twitter Privacy Policy](#)

**Please note** - if you decide not to accept cookies you will need to up-date your cookies preferences before you will be able to enter the Glasgow Life site(s) - see below for further information on how to do this. You will only be asked to do this once but can amend your preferences at any time. Restricting your browser cookie settings could affect the functionality of our website and other external websites you may visit on the internet.



IF YOU WOULD PREFER TO DISABLE COOKIES YOU NEED TO CHANGE THE BROWSER SETTINGS ON YOUR COMPUTER TO REJECT COOKIES.

### **Microsoft Internet Explorer**

1. Choose "Tools" from the menu at the top of your browser
2. Click on "Internet Options"
3. Click on the "Privacy tab"
4. Select the setting that best suits your needs

### **For Mozilla Firefox**

1. Choose "Tools" from the menu at the top of your browser
2. Click on the "Privacy" icon
3. Select the setting that best suits your needs

### **Google Chrome**

1. Click the spanner icon on the browser toolbar.
2. Select "Settings"
3. Select "Show advanced settings"
4. Select the setting that best suits your needs

### **Safari**

1. Choose "Preferences" from your toolbar
2. Select "Privacy"
3. Select the setting that best suits your needs

FURTHER INFORMATION:

[Scottish Information Commissioner's page on cookies](#)

[Information Commissioner's Office](#)

[All About Cookies](#)

---

## COPYRIGHT

The contents of these pages are copyright © Culture and Sport Glasgow 2016.

You may download to a local hard disk and print extracts from our websites for your personal use. You may also re-copy downloaded extracts to others provided you do not do so for profit. Reproduction of part or all of the contents in any form is prohibited unless for personal use.

None of the content of our websites may be copied or otherwise incorporated into or stored in any other websites, electronic retrieval system, publication or other work in any form (whether a hard copy, electronic or other).

For the avoidance of doubt, framing of this site or any part of it is not permitted without express permission.

## DISCLAIMER

Glasgow Life makes no warranties, representations or undertakings about:

- any of the content of our websites (including, without limitation, the quality, accuracy, completeness or fitness for any particular purpose of such content); or
- any content of any other websites referred to or accessed by hypertext link through our websites ("third party site")

## INFORMATION USE AND PRIVACY POLICY

### INTRODUCTION

“A person who requests information from a Scottish public authority which holds it is entitled to be given it by the authority.” (Section 1(1) of the Freedom of Information (Scotland) Act 2002);

“Everyone has the right to respect for his private and family life, his home and his correspondence.” (Article 8(1) of the European Convention on Human Rights).

- 1.1. The two passages quoted above serve to highlight the conflicting demands which can be placed on the information held by public sector bodies such as Glasgow Life. Freedom of information requires us to be open and transparent with our stakeholders, whereas human rights and data protection considerations mean that not all information can properly be released, and Glasgow Life is obliged both legally and morally to hold information securely and in confidence to ensure that only those with a legitimate need to see that information are able to do so. This document sets out the high level Policy describing how Glasgow Life will approach the collection, use, disclosure and disposal of information.
- 1.2. This Policy is primarily concerned with personal data, i.e. information relating to identifiable living individuals, and its main focus is to explain to external stakeholders what Glasgow Life will do with that information. Glasgow Life also has a governance framework, which supplements this Policy. Glasgow Life’s governance framework is primarily concerned with how Glasgow Life manages information internally.
- 1.3. In terms of explaining what Glasgow Life does with information, this Policy should be read alongside the [Privacy Statement](#) published by Glasgow Life.

---

## 2. STRATEGIC POSITION ON INFORMATION:

2.1. Information is a corporate asset. Glasgow Life accordingly adopts the following points of principle in relation to the information which it acquires or creates:

2.1.1. Glasgow Life recognises that it holds information as custodian for the people of Glasgow.

2.1.2. Glasgow Life recognises the importance of the information it holds, in terms of its impact on and relevance to the people of Glasgow, its intrinsic value in assisting Glasgow Life perform its public functions, and its potential value to future generations as a historical and archival resource.

2.1.3. If information relates to the private or family life of an individual, Glasgow Life will as a general principle seek to keep that information confidential and will resist releasing it where possible. This Policy sets out the circumstances under which Glasgow Life may or will release information of this type, who it may release it to and why.

2.1.4. If information does not relate to the private lives of individuals, then Glasgow Life will as a general principle consider that the information be treated as public.

2.1.5. Information held by Glasgow Life will be treated in accordance with the rules set out in this Policy. This Policy is accordingly Glasgow Life's explanation of the way in which it handles personal information.

---

### 3. WHAT WE USE PERSONAL INFORMATION FOR

- 3.1. Glasgow Life uses the information which it holds for the primary purpose of providing relevant local authority services to service users. For most (but not all) services, this is on the basis of the service user agreeing to provide information to Glasgow Life in order to allow Glasgow Life to provide those services. Some regulatory or protective functions require to be carried out without the consent of those affected. See our [Privacy Statement](#) for details.
- 3.2. Glasgow Life will also use the information it holds for the prevention and detection of crime where this is relevant. We will not ask for consent for this, or for any other area where Glasgow Life would be proceeding whether consent was given or not, but will alert people to the fact that we will be proceeding without their consent. (This would not apply to some regulatory activity such as directed surveillance)
- 3.3. Glasgow Life may wish to offer someone additional services, we may wish to (or be legally obliged to) share information with other public bodies, either to improve service delivery to the individual or for purposes such as crime prevention. We may need to use information for research purposes with a view to improving how services are delivered in future or in order to assess future levels of demand. Where Glasgow Life wishes to make such secondary uses of the personal data it is provided with, this will be made clear to the individuals through Glasgow Life's privacy statement as published annually.
- 3.4. All secondary uses of personal information must comply with the principles set out in this Policy.

---

## 4. PRINCIPLES FOR SECONDARY USES AND DISCLOSURE OF PERSONAL DATA

4.1. Decisions on whether or not Glasgow Life will seek to make a secondary use of personal information or will release personal information to an external agency will be informed by the following priorities:

4.1.1. Is it lawful for Glasgow Life to do so?

4.1.2. Is the release of identifiable information necessary to achieve a legitimate public objective? (If the objective can be achieved without releasing personal information, the alternative method should be pursued instead)

4.1.3. Is this objective one which Glasgow Life should, as a matter of policy, be pursuing or assisting another body in pursuing?

4.1.4. Would the individuals affected have a reasonable expectation that their details would not be used in the way proposed? (Such reasonable expectations would require a very significant public benefit to justify the information release. This relates to what individuals were advised might happen to their details, including what this Policy says might happen to them)

4.1.5. Is the release of the information proportionate to the benefits to be achieved? This means that there should be a relationship between how privacy-intrusive the measure is and how significant the benefit to be achieved is. Privacy intrusiveness is dependant on a number of factors such as: how many people are affected; how much information about them is released; the nature of the information in question; how widely the information will be shared; how long it will be shared for; and the degree to which affected individuals may or may not be able to opt out of the process. If the benefits can be achieved with less privacy intrusion, or if major privacy intrusion will produce only minor benefits, then what is proposed will be a disproportionate interference with privacy and will be resisted.

4.2. In reaching a decision on any proposed secondary use or external disclosure, Glasgow Life Senior Officers will, when relevant, make full use of privacy impact assessments, and will follow best practice as published by the (UK) Information Commissioner in relation to these privacy impact assessments (including best practice as to when such an assessment is required and the level of detail required in this assessment). Secondary uses or external disclosures will only proceed where the outcome of any privacy impact assessment is favourable.



## RE-USE OF PUBLIC SECTOR INFORMATION REGULATIONS

The Re-use of Public Sector Information Regulations 2015 ("the 2015 Regulations") apply to public sector organisations in the UK. The 2015 Regulations govern the re-use of information that has been obtained from a public body such as Glasgow Life. The 2015 Regulations will apply if an applicant has been provided with information by Glasgow Life and wants to re-use that information for a purpose other than that for which it was originally produced.

Information can be obtained from Glasgow Life, for example, through an information request under the Freedom of Information (Scotland) Act 2002 or the Environmental Information (Scotland) Regulations 2004. An applicant who obtains information in this way from Glasgow Life does not have an automatic right to re-use that information. The purpose of the 2015 Regulations is to allow an applicant to apply to re-use public sector information, based on the principles of fairness, transparency, non-discrimination and consistency of application.

---

### INFORMATION ASSET LIST REGISTER

The 2015 Regulations also require public bodies to hold and make available an Information Asset List Register ("the Register") which shows information that the organisation makes available for re-use.

An applicant can apply for re-use of the information contained within the Register.

In addition, requests can also be made to re-use Glasgow Life information that is already available in the public domain (i.e. it is on our websites or otherwise publically available).

An applicant can also apply to Glasgow Life to re-use information that is not contained within the Register or available on our website and Glasgow Life will consider the application.