

**IMPORTANT:** Please ensure you have been provided with our ([general privacy notice](#)) for collecting personal information. You can also see our ([privacy statement](#)) on our website for further details on how we collect, use, share and store personal information.

**Specific processing purposes and legal basis, etc:** Free Public WiFi



**(controller) who we are:**

Glasgow Life, the operating name of Culture and Sport Glasgow, is the controller of personal information collected by us that is necessary for our processing purposes. See [contact us](#) for details of our data protection officer.



**Specific (purposes) why do we need your personal information and what do we do with it?**

If you sign up and use our free public Wi-Fi, we obtain certain information about you, your device and connections to this service, such as:

- your personal contact details and/or social media profile for login purposes;
- your WiFi device details; and
- your WiFi use, including the date, time, duration and location of access.

We use this limited information for our legitimate interests to better understand who is using our services and general patterns of WiFi use.

We only use this information to analyse and understand broader trends, for business planning, service improvements and marketing purposes, and we do not receive any information about the websites you browse, the apps you use or any of your own personal communications. For this reason, we believe our legitimate interests are not outweighed by your data protection rights.

If you opt-in to receive our marketing when you sign up, we will process your personal information including your email address to send you personalised marketing communications. We will never sell or rent your personal information to any external party. Every email marketing communication that we send you will also have an unsubscribe link should you wish to opt-out.

After registration and/or consent to receive marketing from us, you can access and control all your personal data that is collected using an online portal (My Data) available at: <https://purple.ai/my-data>. The My Data portal aggregates all of the information collected on your use of the free public WiFi service and is split into 3 areas:

- My Personal Information (registration and login details used)
- My Activity (venues visited; marketing received; devices and access methods)
- My Communication Settings (marketing preferences)



**Specific (sharing) who do we share your information with?**

- We may need to share your information with other public bodies if required to do so by law or for fraud detection and prevention;
- Your information is also analysed internally to help us improve our services. This data sharing is in accordance with our Information Use and Privacy Policy and covered in our full privacy statement on our website.
- Your information will be shared with law enforcement bodies where required or permitted by law.

To provide the service to you, we need to use other organisations as processors to provide the systems we use and services we provide. We put legal safeguards in place to ensure these

processors only act on our written instructions and don't use your information for their own purposes. Some information however, is processed by them anonymously and for legitimate reasons so that they can monitor, analyse, maintain and improve the service.



#### **Specific (legal basis) for using your information:**

We rely on the following:

- performance of a task carried out in the public interest by Glasgow Life (free public WiFi);
- legitimate interests (for trends analysis and service planning and improvements);
- legal obligation (where required or permitted by law);
- for the establishment, exercise or defence of legal claims or whenever courts are acting in their judicial capacity;
- for reasons of substantial public interest (equality of opportunity or treatment, preventing or detecting unlawful acts, protecting the public against dishonesty, preventing fraud, suspicion of terrorist financing or money laundering); and
- consent (for marketing - you can withdraw at any time).

Some of the above legal bases for processing will overlap and there may be several grounds which justify our use of your personal information.

As we have a statutory basis for collecting your personal data if you do not provide the requested information we will be unable to process your registration.

You can see a summary of how **your rights** are implemented for each **legal basis** used at: [www.glasgowlife.org.uk/privacy-rights](http://www.glasgowlife.org.uk/privacy-rights)



#### **(more information):**

You can find more details about how we handle your personal information at: [www.glasgowlife.org.uk/privacy](http://www.glasgowlife.org.uk/privacy). If you need help in another format e.g. large print, braille or audio, please ask a member of staff, contact us or visit: [www.glasgowlife.org.uk/accessibility](http://www.glasgowlife.org.uk/accessibility)



#### **(contact us):**

You can contact our data protection officer about any data protection matter by post at this address: c/o Data Protection, GCC, City Chambers, George Square, Glasgow G2 1DU, United Kingdom; by email at: [dataprotection@glasgow.gov.uk](mailto:dataprotection@glasgow.gov.uk); and by telephone on: 0141 287 1055.