

## PRIVACY NOTICE

This privacy notice applies to individuals who use our website at [milestonesscotland.co.uk](https://milestonesscotland.co.uk) ("Website"), and/or individuals who contact us by telephone, e-mail or other means (including other electronic means). Our Website is not intended for children and we do not knowingly collect any personal data relating to children.

### 1 Who we are

We are Milestones Scotland Limited, a company registered in Scotland (company number SC658199) whose registered office is at C/O Morton Fraser LLP 5th Floor, Quartermile Two, 2 Lister Square, Edinburgh, Scotland, EH3 9GL.

We are a **controller** for the purposes of Regulation (EU) 2016/679 of the European Parliament and of the Council of 27th April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data (General Data Protection Regulation) as it forms part of the law of England and Wales, Scotland and Northern Ireland by virtue of section 3 of the European Union (Withdrawal) Act 2018 (the UK GDPR), the Data Protection Act 2018 and related data protection legislation.

If you live outside the UK other data privacy laws may apply to you if you use our Website. If you live in the EU, Regulation (EU) 2016/679 (General Data Protection Regulation) will apply in respect to any processing of your personal data by Milestones Scotland Limited.

### 2 How to contact us

If you have any questions about this privacy notice or our data protection policies generally, please contact us:

By post: 8 Achany Road Dingwall Ross-shire IV15 9JB

By email: [contact@milestonesscotland.co.uk](mailto:contact@milestonesscotland.co.uk)

By phone: 07878922942

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues (<https://ico.org.uk>). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

### 3 Privacy notice

We are committed to protecting your personal data and your privacy. This privacy notice sets out the basis on which any personal data we collect from you, or that you provide to us, or that we acquire through a third party, will be processed by us. Please read the following carefully to understand our practices regarding your personal data and how we will treat it.

Before we process your personal data, we are obliged to inform you of who we are, why we need to process your personal data, what we will do with your personal data and to whom we may pass your personal data.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

This privacy notice does not apply to our employees, workers, volunteers, secondees and consultants.

This version of our privacy notice was last updated on May 23 2022

#### 4 What personal data do we collect and process?

**Personal data**, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity of the individual has been removed (**anonymous data**).

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

- **Identity Data** includes first name, last name, marital status, title and gender.
- **Contact Data** includes home or work address, email address and telephone numbers.
- **Usage Data** includes information about your visit and how you use our Website.
- **Technical Data** includes information about the device you use to access the Website.

We may collect, use and share "**Aggregated Data**" such as statistical or demographic data for any purpose. Aggregated Data may be derived from your personal data but is not considered personal data in law as this data does not directly or indirectly reveal your identity. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy notice.

#### 5 How is your personal data obtained?

We may obtain or collect your personal data through:

| <b>Source</b>                                | <b>Example</b>  |
|--|---|
| Direct interactions with you                 | <p>You provide us with your personal data when you provide information to us through the Website or correspond with us by post, phone, e-mail or otherwise, including when you:</p> <ul style="list-style-type: none"> <li>• enquire about our services;</li> <li>• complete and submit a form on the Website; or</li> <li>• give us feedback or contact us.</li> </ul> |
| Automated technologies or interactions       | <p>Technical Data and Usage Data relating to your interaction with the Website may be collected using cookies (please see our cookie policy at <a href="https://milestonesscotland.co.uk/cookies/">https://milestonesscotland.co.uk/cookies/</a> or other similar technologies.</p>   |
| Third parties and publicly available sources | <p>We may obtain your personal data from publicly available sources. Individuals may provide your personal data by completing and submitting a form on the Website.</p>   |

Please note you should not provide any third party personal data to us when using the Website or otherwise.

#### 6 Failure to provide personal data

Where we need to collect personal data by law, or to provide services to you and you fail to provide that data when requested, we may not be able to perform services for you.

## 7 How will we use your personal data?

Personal data may be processed by us where you consent to the processing or where that processing is necessary for 1) to provide services to you; or 2) compliance with a legal obligation to which we are subject; or 3) the purposes of our legitimate interests (or those of a third party).

**Legitimate interests** means the interest of our business in conducting and managing that business to enable us to give you the best service/product and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by contacting us.

We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so.

We may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us if you need details about the specific legal ground or grounds we are relying on to process your personal data.

| Purpose/Activity   | Type of data  | Lawful basis for processing (including basis of legitimate interest)  |
|--|---|---|
| Where you use our Website to submit information          | (a) Contact<br>(b) Identity<br>(c) Usage<br>(d) Technical | (a) To provide services to you<br><br>(b) Necessary for our legitimate interests (to manage customer relationships)<br><br>(c) Necessary to comply with a legal obligation<br><br>(d) Necessary for our legitimate interests (to maintain network security and administer the functionality of the Website)<br><br>(e) Necessary for our legitimate interests (to maintain Website relevance for users) |
| Where you visit our Website to browse                    | (a) Usage<br>(b) Technical                                | (a) Necessary for our legitimate interests (to maintain network security and administer the functionality of the Website)<br><br>(b) Necessary for our legitimate interests (to maintain relevance for visitors to our Website)   |
| Where you contact us by phone or email or by other means | (a) Identity<br>(b) Contact                               | (a) Necessary for our legitimate interests (to communicate with you)  |

|  |   |  |
|--|---|--|
|  |   | (b) Necessary to comply with a legal obligation  |
| To establish, exercise and defend our legal rights | (a) Contact<br>(b) Identity<br>(c) Usage<br>(d) Technical | Necessary for our legitimate interests (in protecting our legal rights)  |
| Sharing your personal data                         | (a) Contact<br>(b) Identity<br>(c) Usage<br>(d) Technical | (a) Necessary for our legitimate interests (to develop and improve our services, maintain network security and defend our legal rights)<br><br>(b) Necessary to comply with a legal obligation |

We will only use your personal data for the purposes for which we 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 you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us at [contact@milestonesscotland.co.uk](mailto:contact@milestonesscotland.co.uk).

## 8 With whom do we share your personal data?

### 8.1 Sharing with processors

We use certain third-party service providers as processors, and therefore, in the course of providing our services, we may share your personal data with these third parties, including:

| <b>Third party processor</b> | <b>Why</b> | <b>Location</b> |
|------------------------------|------------|-----------------|
| [Website host]               |            |                 |
| [Managed IT services]        |            |                 |

We do not allow our processors to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

### 8.2 Sharing with other controllers

There may be circumstances in which we need to share your personal data with certain third parties who are also controllers under the applicable data protection legislation. The third parties to which we may transfer your personal data include:

| <b>Third party controller</b>            | <b>Why</b>                               | <b>Location</b> |
|--|--|-----------------|
| Professional advisers including lawyers, | To receive legal, accountancy, insurance | UK              |

|  |  |    |
|--|--|----|
| accountants, auditors and insurers   | and other professional services  |    |
| Service sub-contractors and partner companies  | Where relevant to services that we provide to you  |    |
| Fraud prevention agencies  | To comply with our legal obligations   |    |
| Acquirers of all or part of our business or undertaking  | To allow us to sell or merge all or part of our business or undertaking to a third party |    |
| Any relevant regulatory authority or law enforcement agency (including the ICO and HM Revenue & Customs), courts and tribunals | To comply with our legal obligations and to comply with any reporting obligations        | UK |

## 9 International transfers

We generally do not transfer your personal data out of the UK. However, whenever we are required to transfer your personal data out of the UK (for example where a third party supplier is located outside of the UK), we ensure a similar degree of protection is afforded to it by ensuring that appropriate safeguards are implemented, including any of the following:

- We will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data by the UK government.
- Where we use certain service providers, we may use specific contracts approved by the UK which give personal data the same protection it has in UK.
- You have provided your explicit consent to the transfer of your personal data outside of the UK.
- The transfer is necessary for the purposes of performing a contract between us and you (the data subject).

Where you use the Website in a country outside the UK, your personal data will be transferred to and processed in the country from where you have accessed it. You acknowledge and agree that such a transfer of your personal data outside the UK is entirely your responsibility.

## 10 Automated decision making and profiling

We do not use automated decision-making (including profiling) to make any decisions which would produce a legal effect or similarly significantly affect a data subject.

## 11 How long do we retain your personal data?

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

## 12 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, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions, and they 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 the Information Commissioner's Office of a breach where we are legally required to do so.

## 13 Your rights

***Your personal data is protected by legal rights, which include your rights to:***

- **Request access to your personal data** (commonly known as a "data subject **access request**"). ***This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.***
- **Request correction of the personal data that we hold about you.** This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.
- **Request erasure of your personal data.** This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. Note, however, that we may not always be able to comply with your request of **erasure** for specific legal reasons which will be notified to you, if applicable, following your request.
- **Object to processing of your personal data** where we are relying on a legitimate interest (or those of a third party) and there is something about your particular **situation** which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes.
- **Request restriction of processing of your personal data.** This enables you to ask us to suspend the processing of your personal data in the following scenarios: if you want us to establish the data's accuracy; where our use of the data is unlawful but you do not want us to erase it; where you need us to hold the data **even** if we no longer require it as you need it to establish, exercise or defend legal claims; or you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.
- **Request the transfer of your personal data to you or to a third party (data portability).** We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.
- **Withdraw consent at any time where we are relying on consent to process your personal data.** However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to

provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

If you wish to exercise any of these rights, please contact us using the details above.

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other 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 ask you for further information in relation to your request to speed up our response.

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

We try 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.