

Data Privacy Notice

Purpose and lawful basis for processing

We collect and process personal data (including special category data, where it is relevant to the report) in line with our legal, regulatory and statutory obligations to investigate Speak Out whistleblowing reports and to take remedial action.

What information we need

When we receive a report, we'll set up a case file containing details of the concern. This is likely to include the identity of individuals (although the reporter may choose to remain anonymous), contact details and any other relevant information about individuals involved in the matter.

We need enough information to investigate the concern, including any supporting evidence. This may include Special Category data (such as racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic data, biometric data, data concerning health or data concerning a person's sex life or sexual orientation) where it is relevant.

Why we need it

We need to know the details of the concern so that we can investigate and decide what action we need to take.

What we will do with it

We'll always treat the information as confidential. If it is necessary to disclose some personal data to a third party, we will require those parties to adhere to strict standards of security.

If possible, we'll give the reporter feedback about any action we take as a result of their disclosure. However, this feedback may be restricted.

We compile and report statistics to the Society's Board of directors showing the number and nature of reports we receive, but not in a form that identifies anyone.

Our data processors

For reports received via Safecall UK, Safecall UK is the data processor and the Society is the data controller.

If the reporter chooses to provide Safecall UK with their identity or contact details, but request that Safecall withhold them from Skipton, Safecall UK will then be regarded as Data Controller of that data which it withholds from Skipton only.

For further details on how Safecall UK processes personal data, please see their privacy policy <https://www.safecall.co.uk/en/privacy-policy-whistleblowing/>

How long we will keep it

We will retain data only for as long as necessary. This may vary, depending on what the report is about, but we will normally anonymise personal data within 12 months of completing an investigation, and retain details of the concern for up to 7 years.

Your rights

Under data protection legislation, you have several rights. You can:

- access and obtain a copy of your personal data,
- require Skipton to rectify incorrect or incomplete personal data,
- request Skipton to delete/erase your personal data (we may not be able to comply with your request, if we are under an overriding obligation to keep it)
- request Skipton restrict the processing of your personal data (in certain circumstances, if you don't want us to delete it)

Contact Us:

If you have any questions about how we collect, use, share or keep personal data relating to Speak Out whistleblowing concerns, or you think there has been a data breach, please contact one of the following:

- Data Protection Officer, DPO@skipton.co.uk
- Group Secretary and General Counsel, secretariat@skipton.co.uk

Or contact the Information Commissioner's Office (ICO), at:

Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF.

Telephone 0303 123 1113, website <https://ico.org.uk>.