

# GENERAL TEACHING COUNCIL FOR SCOTLAND

## Privacy Notice for MyBenefits App

This is the Privacy Notice (the “Notice”) for subscribers to the MyBenefits App (the “App”). By subscribing to the App (as defined in the App Terms and Conditions), you confirm that you are currently registered with the General Teaching Council for Scotland (**GTCS**) and you accept the general terms and conditions of this Notice.

The email address in respect of this Notice is [dataprotection@gtcs.org.uk](mailto:dataprotection@gtcs.org.uk). Any enquiries relating to the processing of Personal Data by GTCS, including matters arising from this Notice, should be addressed to our Data Protection Officer at:

General Teaching Council for Scotland  
Clerwood House  
96 Clerwood Road  
Edinburgh  
EH12 6UT

### WHAT IS THE PURPOSE OF THIS PRIVACY NOTICE?

We are committed to protecting the privacy and security of subscribers to the App. This Notice describes how we collect and use Personal Data about you in accordance with the General Data Protection Regulation (“GDPR”).

As a data controller, GTCS is responsible for making decisions about the means by which, and the purposes for which, we process your Personal Data. We are required under data protection legislation to notify you of the information contained in this Notice. It is important that you read this Notice, together with any other privacy notice we provide on specific occasions when we are collecting or processing Personal Data about you, so that you are aware of how and why we are using such information.

This Notice does not form part of any contract of employment or other contract to provide services. We may update this Notice at any time.

### CHANGES TO THIS PRIVACY NOTICE

We reserve the right to update this Notice at any time and we will provide you with a new privacy notice through the App when we make any substantial updates.

### HOW DOES GTCS COLLECT YOUR PERSONAL DATA?

GTCS registrants who wish to subscribe to the App will be asked to enter their full name, email address and registration number. The data will be stored by GoodBarber who along with GTCS and the GTCS App Developer will be able to access the data if required, only for the purposes detailed in this privacy notice. This is the only personal data that this App collects and will be freely provided by the user of the App (the “User”).

Users will be guided to a third party website to access the offer and if the provider of the benefit (the “Promoter”) requires further Personal Data of the User, this will be provided by the User directly to the Promoter and how and why such Personal Data is collected will not be covered by this Notice or any other GTCS privacy notice. If you submit Personal Data to any Promoter, your information is governed by their privacy policies. We encourage you to carefully read the privacy policy of any Promoter with which you engage.

If Users are required to provide additional Personal Data, the requirement for this will be explained in detail at the point of collecting the data.

The App is hosted by the app builder GoodBarber. GoodBarber is based in the EU, though may engage sub-processors to process data, which sub-processors may be outwith the EU. Any personal data input into the App will be accessible by GoodBarber in terms of its own Privacy Notice and Data Processing Addendum which can be found here: <https://www.goodbarber.com/terms/> .

## **PURPOSE FOR WHICH WE WILL USE YOUR PERSONAL DATA**

Personal Data is collected in order to:

- Log into the App
- Link a redeemed voucher number to the GTCS registration number of the voucher purchaser, please note that this is for verification and reporting purposes only.

## **HOW WILL YOUR PERSONAL DATA BE USED**

The Promoter will be able to use the public teacher register search function on the GTCS website to check that any User accessing an offer is a GTCS registered teacher. You will be asked by the Promoter to share your full name to enable them to undertake this check.

## **PLACE**

The Personal Data is processed at the Data Controller's operating offices and in any other places where the parties involved with the processing, such as any appointed GTCS App Developer, are located. For further information, please contact the Data Controller.

## **RETENTION TIME**

The Personal Data is kept for the time necessary to provide the service requested by the User, or stated by the purposes outlined in this Notice, and the User can always request that the Data Controller suspend further processing or remove the data.

## **LEGAL BASIS FOR PROCESSING**

Our legal basis for processing your personal information is **Consent** or for the pursuit of the Data Controller's legitimate interests. By registering to access the App, you are giving consent for GTCS to contact you using the email address provided to inform you of any information relating to the App, such as new offers. You will be able to unsubscribe from receiving these emails by updating your preferences within the App.

## **LEGAL ACTION**

The User's Personal Data may be used for legal purposes by the Data Controller, in court or in the stages leading to possible legal action arising from the use of this App or its related services.

The User must also be aware of the fact that the Data Controller may be required to reveal Personal Data upon request of public authorities such as, but not limited to, Police Scotland.

## **ADDITIONAL INFORMATION ABOUT USER'S PERSONAL DATA**

In addition to the information contained in this Notice, the App may provide the User with additional and contextual information concerning particular services or the collection and processing of Personal Data upon request.

## **SYSTEM LOGS AND MAINTENANCE**

For operation and maintenance purposes, the App and any third party services may collect files that record interaction with this App (System Logs) or use for this purpose other Personal Data (such as an IP Address).

## **INFORMATION NOT CONTAINED WITHIN THIS PRIVACY NOTICE**

More details concerning the collection or processing of Personal Data may be requested from the Data Controller at any time. Please refer to the contact information at the beginning of this Notice.

## **THE RIGHTS OF USERS**

Users have the right, at any time, to know whether their Personal Data has been stored and can consult the Data Controller to learn about their contents and origin, to verify their accuracy or to ask for them to be supplemented, cancelled, updated or corrected, or for their transformation into anonymous format or to block any data held in violation of the law, as well as to oppose their treatment for any and all legitimate reasons. Requests should be sent to the Data Controller using the contact information set out at the beginning of this Notice.

## **DEFINITIONS:-**

- 1.1. "Consent" means that the individual has given clear consent to their Personal Data to be processed for a specific purpose.
- 1.2. "Data Controller" has the meaning given in the Data Protection Laws.
- 1.3. "Data Processor" has the meaning given in the Data Protection Laws.

- 1.4. "Data Protection Laws" means any law, statute, subordinate legislation regulation, order, mandatory guidance or code of practice, judgment of a relevant court of law, or directives or requirements of any regulatory body which relates to the protection of individuals with regard to the processing of Personal Data to which a Party is subject including the Data Protection Act 2018, the Privacy and Electronic Communications (EC Directive) Regulations 2003 (as may be amended by the proposed Regulation on Privacy and Electronic Communications) and the GDPR.
- 1.5. "GDPR" means Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of Personal Data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation).
- 1.6. "Personal Data" has the meaning given in the Data Protection Laws.
- 1.7. "Processing" has the meaning given in the Data Protection Laws and cognate expressions shall be construed accordingly.