**Chat Bot Privacy Policy**

**Who We Are and Important Information**

The Citizens Advice Scotland (“we / us / our/ CAS”) provides the service called the Citizens Advice Money Talk Plus and it controls and operates this website (“Site”). We are committed to protecting the privacy of each user (“you / your”) of our Site and service. We act as a controller of your personal data. This Privacy Notice provides you with information about the personal data we collect from you on our Site and through using our service. Please read this Privacy Notice, together with our [Website Privacy Notice](https://www.cas.org.uk/privacy-data-protection-and-cookies), terms of use, and cookie policy for more detailed information.

This Privacy Notice sets out the type of personal information we collect about you, why we collect it, and how we use it when you use our chatbot service.

It is important that you read this Privacy Notice together with our website privacy notice which contains more detailed information about our data processing and can be accessed here or you can request a copy from us.

Questions, comments, and requests regarding this privacy notice are welcomed and should be emailed to our Data Protection Officer on dpo@cas.org.uk, or sent in writing to:

Thorntons Law LLP

Whitehall House

33 Yeaman Shore

Dundee DD1 4BJ

**What Personal Data we collect and how this is collected**

We collect personal data such as:

* your phone number, email address, and postcode
* the information within the free text facility within the chat
* the transcript of the chat

We also collect, use and share Aggregated Data such as statistical or demographic data for any purpose. Aggregated Data could be derived from your personal data but is not considered personal data in law as this data will not directly or indirectly reveal your identity. For example, we will process and share a copy of what general advice was given after the chat has ended with our chatbot supplier to improve the chatbot service. 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 and our [Website Privacy Notice](https://www.cas.org.uk/privacy-data-protection-and-cookies).

**Purposes of using your Personal Data and lawful basis we rely on**

We use your personal data to:

* provide you with the chatbot service
* learn from and improve the service
* share the data within CAS, the bureaux network, and our third party chatbot supplier to facilitate improvement of services and wider development of services for fellow members of shared services
* manage our relationship with you e.g. to contact you where you request this
* meet our regulatory requirements or legal responsibilities, as required.

We will only use your personal data when the law allows us to. Our lawful basis to process your personal data is in our legitimate interests. It is in our legitimate interest and those of the bureaux network to respond to enquiries, requests, and information received to ensure we provide you with the relevant support, improve the service, and share personal data with our third party chatbot supplier which helps us to provide and improve the service.

**Who do you share my information with?**

We may share your personal data with CAS, our third-party supplier who helps us develop, improve and supply the chatbot service, and other local Citizen's Advice Bureaus to provide you with the correct advice and/ or support. We also share this data with Google Cloud, insurers, and regulators.

**Personal Data Transfers**

We transfer personal data to and from the EEA and UK based on the adequacy decisions for the UK and EU. Please see our [website privacy notice](https://www.cas.org.uk/system/files/privacy_notice_-_general_for_website_0.pdf).

**How long do we keep records for?**

We will only keep your personal data for as long as reasonably necessary to fulfil the purposes we collected it for, including to satisfy any legal, insurance, regulatory, tax, accounting, or reporting requirements or if there’s a complaint or if we reasonably believe there is a prospect of litigation.

If you chose not to get in touch with us after the chat has ended we’ll keep the data from the chat for 3 months. Where you get in touch with us we keep this for 7 years and for certain complex cases we keep this data for 16 years.

We may keep data longer than these periods if necessary. Examples of where records need to be kept beyond the retention periods include records of advice and support around statutory debt options and building works over a certain value.

**Your Legal Rights**

Under certain circumstances, you have rights under data protection laws concerning your personal data including the right to receive a copy of the personal data we hold about you, the right to rectification, restriction, erasure, objection, as well as the right to portability. You also have the right to make a complaint at any time to a supervisory authority which is the Information Commissioner's Office in the UK and is the regulator for data protection issues ([www.ico.org.uk](http://www.ico.org.uk)).