

## Our Privacy Policy

Age UK Stockport is a local independent organisation working to support your wellbeing through information advice and services.

Age UK Stockport is a registered charity number 1139547 and company limited by guarantee 7413632. Our registered office is Commonweal, 56 Wellington Street, Stockport SK1 3AQ.

This policy gives important information about:

- the data protection principles (see below) with which Age UK Stockport and associated companies Age UK Stockport Trading and Step Out must comply;
- what is meant by personal information (or data) and sensitive personal information (also referred to as data);
- how we gather, use and (ultimately) delete personal information and sensitive personal information in accordance with the data protection principles;
- where more detailed privacy information can be found, eg about the personal information we gather and use about you, how it is used, stored and transferred, for what purposes, the steps taken to keep that information secure and for how long it is kept;
- your rights as a 'data subject' and obligations in relation to data protection; and
- the consequences of failure to comply with this policy.

## Introduction

Trust is fundamental to our work with you and privacy is a fundamental human right so we are committed to protecting and safeguarding your privacy and personal information (data) by complying with our data protection obligations under law and good practice.

We are also committed to being open, clear and transparent about how we obtain and use (process) personal information and how we store it and when we delete that information once it is no longer required.

We are a local charity delivering activities and support every day and we use personal information on a day to day basis in order to operate. We obtain, keep and use personal information for a number specific lawful purposes, as set out in this policy. Our use of personal information allows us to make better decisions, work efficiently and effectively and ultimately, helps us to reach our mission of 'supporting your wellbeing'.

At Age UK Stockport we take your privacy seriously and will only use your personal information to support our work with you and to provide information and advice and support and services you have requested from us.

We will be clear when we collect your information about why we need it and what we will do with it. This policy describes how and why Age UK Stockport uses your personal information (data), how we protect your privacy when doing so, and your rights and choices regarding this information.

We promise to respect any of your personal information, which is under our control, and to keep it safe. We maintain several policies and technical and physical processes and systems, including an international Information Security Management Standard ISO 27001 to help us do this.

### **Our Privacy Policy Statement- Age UK Stockport Data Protection Policy:**

Age UK Stockport & Associated Companies recognises its responsibility under the Data Protection Laws to process personal information. Age UK Stockport fully endorses and adheres to the Principles of Data Protection as set out in the **Data Protection Act 2018** and the **General Data Protection Regulation (GDPR) (EU) 2016/679**.

Where the organisation is required to process personnel data regarding any person with whom it works and in relation to current, past, or prospective employees or volunteers as part of its operation Age UK Stockport shall ensure compliance with the principles and the requirements of current Data Protection Law.

We will comply with the data protection principles when processing personal information data in all respects and In keeping with the principles as follows:

- we will process personal information lawfully, fairly and in a transparent manner
- we will collect personal information for specified, explicit and proper legal / legitimate purposes only, and will not process it in a way that is incompatible with those legitimate purposes
- we will only process the personal information that is adequate, relevant and necessary for the relevant purposes
- we will keep accurate and up to date personal information, and take reasonable steps to ensure that inaccurate personal information is deleted or corrected without delay
- we will keep personal information in a form which permits identification of data subject for no longer than is necessary for the purposes for which the information is processed

- we will keep all personal data secure through all appropriate technical and organisational measures
- Shall maintain the appropriate Privacy Standards in relation to the use of data
- Shall recognise and support the rights of all individuals (data subjects) in relation to their data.
- will take appropriate technical and organisational measures to ensure that personal information are kept secure and protected against unauthorised or unlawful processing, and against accidental loss, destruction or damage.

Age UK Stockport will adopt a privacy by design approach and implement the appropriate technical and organisational measures to integrate data protection in all organisational activities as part of the focus on the organisation's accountability under Data protection law.

We will also be accountable and keep proper records of our responsibilities and actions to comply with data protection requirements.

### Contact Preferences

Age UK Stockport would like to keep in touch with you to let you know about the important local work we do for older people. However, we want to be sure we use your contact details in the way you allow us to.

From time to time, we would like to contact you with an update of our activities and services and also events of our own or others we think may be of interest to you. We would like to send you information about these by email, post, or telephone.

We prefer email wherever possible as postage costs can be prohibitive. However, we may also occasionally want to send you information by post, such as AGM information. You don't have to provide your telephone number, but it will enable us to contact you quickly if we need to contact you about the support we are providing.

If you agree to being contacted for this purpose, we will ask you to indicate how we may contact you, for example email, post or telephone.

You can unsubscribe from these communications at any time.

### How we Collect Information about you

We collect information in the following ways:

#### Information you provide to us directly

Most of the information we hold you will give us directly. You will give us information for example when working with us, requesting support or services from us, or joining activities or attending our events. When you use our website, we collect your

personal information using “cookies” and other tracking methods. There are more details in relation to the website in our Privacy Policy on our website.

### **Information you provide to us indirectly**

Your information may be shared with us by third parties, for example if you sign up through an external website or if you are a researcher and your information is shared with us by the principal investigator or institution. You should check any privacy policy provided to you where you give your data to a third party.

### **Information from other sources**

We also use information from the following sources:

Social Media: Depending on your settings, for example when you publicly tag us in an event photo

Information available publicly: We may have information from publicly available sources such as charity websites and annual reviews, corporate websites, public social media accounts.

## **What Personal Information We Collect**

Data security is very important to us and so we will only collect and process data where it is necessary for us to do so.

We collect and use the following kinds of personal information (list not exclusive):

- your name
- your contact details (including postal address, telephone number, e-mail address and/or social media identity)
- your age and / or date of birth
- your gender
- your bank or credit card details where you provide these to make a payment
- information about your activities on our website(s) and about the device you use to access these, for instance your IP address and geographical location
- information about your interests, events, activities, and products which we consider to be of interest to you
- information about your personal and family history and current circumstances where relevant to supporting you with the service
- information relating to your health where relevant to supporting you with the service you have requested from us or if you are taking part in or attending an activity where this is appropriate for health and safety
- information about your next of kin where it is relevant to us keeping you safe
- information about your financial situation where relevant to supporting you in benefits claim or other financially related request
- information about you're your needs and wishes and progress in relation to these whilst working with Age UK Stockport

- where you have left us a legacy, any information regarding next of kin with which you may have provided us to administer this
- information as to whether you are a taxpayer to enable us to claim Gift Aid
- age, nationality and ethnicity information for monitoring purposes; and
- any other personal information you provide to us.

**Sensitive Data:** Certain types of personal information are in a special category under data protection laws, as they are more sensitive. Examples of this type of sensitive data would be information about health, race, religious beliefs, political views or sex life or sexuality.

We only collect this type of information where there is a clear reason for us to do so, for example asking for health information if you are taking part in a sporting event, or where we ask for information for the purpose of providing you with support you have requested from us. Wherever it is practical for us to do so, we will make clear why we are collecting this type of information and what it will be used for. We will also collect this type of information if you make it public or volunteer it to us.

### How we Use your Information

We will always use your data in line with the principles set out in the latest Data Protection Laws and regulations.

We will also use them in accordance with our general privacy notices:

Age UK Stockport works to provide high quality information support and services. To help us do this we need to hold your contact details and keep information about our work with you and we share basic data within the organisation.

We hold all information and records securely, mainly on a computerized data management system, and we use a combination of working practices and policies to keep it safe.

As we receive funding from statutory bodies, we need to collect data to report on our work and research to understand the needs of local people. However, the data will be anonymized and no one will know the data is linked to you.

If you have used our services, we may on occasion share basic demographic and service information with Age UK the national charity so they can help us monitor and ultimately improve the services we provide. The information we share will not include your name or your contact details, unless you give us your consent to do so for a specific purpose, such as sharing your story. When we do share this information, we do so under the lawful basis of legitimate interest (see below).

We will not disclose your information to any third party without your permission. If we think this is appropriate, we will let you know with whom and what we are sharing

and gain your specific consent. The only exceptions to this are for legal or exceptional purposes.

Please note you have a number of rights in relation to any data we hold about you such as the right to access it; and also, you can withdraw your consent at any time. Full details are set out in our Privacy Standard which is available on our website.

We will use information to provide you with the services, or information and advice you asked for. Your worker will keep notes about our work with you to enable us to deliver the support or services you request in a safe way. This could include:

- send you correspondence and communicate with you
- keep a record of your relationship with us
- administer your donation or support your fundraising, including processing Gift Aid
- respond to or fulfil any requests, complaints or queries you make to us
- understand how we can improve our services, products or information by conducting analysis and market research
- manage our events
- check for updated contact details against third party sources so that we can stay in touch if you move (see “Keeping your information up to date” below)
- further our charitable objectives
- register, administer and personalise online accounts when you sign up to products we have developed;
- process applications for funding and for administration of our role in the projects we fund
- administer our websites and to troubleshoot, perform data analysis, research, generate statistics and surveys related to our technical systems
- testing our technical systems to make sure they are working as expected
- contact you if enter your details onto one of our online forms, and you don't ‘send’ or ‘submit’ the form, to see if we can help with any problems, you may be experiencing with the form or our websites
- display content to you in a way appropriate to the device you are using (for example if you are viewing content on a mobile device or a computer)
- generate reports on our work, services and events
- safeguard our staff and volunteers
- conduct due diligence and ethical screening
- monitor website use to identify visitor location, guard against disruptive use, monitor website traffic and/or personalise information which is presented to you
- process your application for a job or volunteering position
- conduct training and quality control
- audit and administer our accounts



- meet our legal obligations, for instance to perform contracts between you and us, or our obligations to regulators, government and/or law enforcement bodies
- carry out fraud prevention and money laundering checks
- undertake credit risk reduction activities; and/or
- establish, defend, or enforce legal claims.

We will monitor information continuously and add examples as required:

### Legal basis for processing

We must have a valid lawful basis in order to process your personal data. Data protection laws mean that each use we make of personal information must have a “legal basis”. [The relevant legal bases are set out in the General Data Protection Regulation (EU Regulation 2016/679) and in current UK data protection legislation.]

There are six available lawful bases for processing and the law requires us to determine under which of six defined bases we process different categories of your personal information, and which basis is most appropriate will depend on our purpose and relationship with you.

We will be clear about the basis we are using. If a basis on which we process your personal information is no longer relevant, then we shall immediately stop processing your data or notify you of a changed basis.

### Consent

Consent is where we ask you if we can use your information in a certain way, and you agree to this. For example, when we ask to send you information and ask you how you your contact preferences or where we ask your consent to share information with a named third party.

We recognise the importance of Consent being about trust and meaning offering real choice and control to you This will include guidance (Information Commissioners Office) that consent must be:

- Unbundled: Clear and separate from other terms and conditions.
- Active Opt IN: Consent requires a positive opt-in - no pre ticked boxes or implied consent
- Explicit: consent requires a very clear and specific statement of consent.
- Granular: to ensure separate consent for separate things. Vague or blanket consent is not enough.
- Named: Name any third party controllers who will rely on the consent.
- Easy to Withdraw: Make it easy to withdraw consent
- Refreshed: Valid consent does not last forever
- Documented and verifiable: whether given in writing or verbal it must be recorded fully.

Where we use your information for a purpose based on consent, you have the right to withdraw consent for any future use of your information for this purpose at any time.

Examples are where we collect and hold data you give us to provide you with information or a service; where you give us specific consent to disclose information to a named third party to help with your issues; or where we process sensitive data you give us to enable us to provide you with a safe service.

### Legal obligation

We are subject to the law like everyone else, so sometimes we have a basis to process your personal information to comply with a legal statutory or regulatory obligation. For example, we may be required to give information to legal authorities if they so request or if they have the proper authorisation such as a search warrant or court order.

Examples: where you exercise your rights under data protection law and make requests; to verify your identity; compliance with legal and regulatory disclosures.

### Contract

We have a basis to use your personal information where we are entering into a contract with you or performing our obligations under that contract. Examples of this would be if you are buying a service from us, or otherwise agree to our terms and conditions, a contract is formed between you and us. To carry out our obligations under that contract we must process the information you give us. Some of this may be personal information.

Examples: enables us to perform our obligations where we have a contract for services with you; to update our records in accordance with the contract; or to trace your whereabouts regarding your account.

### Vital interests

We have a basis to use your personal information where it is necessary for us to protect life or health. For instance, if there were to be an emergency impacting individuals at one of our events, or a safeguarding issue which required us to contact people unexpectedly or share their information with emergency services.

Examples: if you have given us your next of kin in case of emergency; as given in the section of exceptional circumstances for sharing your data (below).

### Legitimate interests

We have a basis to use your personal information if it is reasonably necessary for us (or others) to do so and in our / their "legitimate interests" if what the information is used for is fair and does not unduly impact your rights.



We consider our legitimate interests to include all the day-to-day activities Age UK Stockport carries out with personal information as part of our work supporting you and others.

We are required to document our decisions on legitimate interests to demonstrate compliance under the new accountability principle. This will include showing we have considered three tests: purpose – necessity –balancing.

We will always balance our interests against your rights and freedoms. We only rely on legitimate interests where we consider that any potential impact on you (positive and negative), how intrusive it is from a privacy perspective and your rights under data protection laws do not override our (or others') interests in us using your information in this way.

When we use sensitive personal information (please see the “What personal information we collect” section above), we require an additional legal basis to do so under data protection laws. We will generally do so based on your explicit consent – see above. Occasionally, another route available to us at law for using this type of information (for example if you have made the information manifestly public, we need to process it for legal purposes, your vital interests, or, in some cases, if it is in the public interest for us to do so).

Examples: for good governance and management of our organisations and its quality standards such as gathering feedback on our performance; or for exceptional circumstances (see below).

### Public Task

This is generally covered in our exceptional and exceptional circumstances for processing.

Examples: reporting an individual who has committed a crime.

### How we keep your information safe

We ensure that there are appropriate technical and organisational controls (including physical, electronic, and managerial measures) in place to protect your personal details.

Your data is stored on our secure system and our network is protected and routinely monitored. Any hard copy data is kept equally secure through robust physical measures.

We also maintain the internationally recognised Information Security Management standard ISO 27001 to ensure we maintain robust security measures over our premises, systems, documents, and operational processes.

### How long we keep your information for

Age UK Stockport will not keep information for longer than we need to and will ensure it is securely deleted when no longer required.

We have specific criteria to determine how long we will retain your information for, which are determined by legal and operational considerations. For instance, we are required to keep some personal information for tax or health and safety purposes, as well as keep a record of your interactions with us.

We keep this in a Data Management Policy which is regularly reviewed. The maximum period identifiable personal data is retained is ten years.

### Sharing Information / Data

We will not share your information with any third parties without your specific agreement. We will never sell or rent your information to third parties for marketing purposes.

In order to ensure you receive the most appropriate assistance for your enquiry, we may need to speak to some third parties on your behalf and pass on some of your details. As noted in our general privacy statement we need your specific consent for this. We will always ask you before we share your information with any other service organisation or any other third party.

As this information could include 'sensitive data' such as health information we will be clear about what is to be shared and who it is to be shared with. The details will only be given on a need-to-know basis.

You can tell us you don't want us to share your details with a particular organisation and we will respect this, unless we are duty bound to inform them.

There are legal or exceptional circumstances where we will need to share your data. Where we are under a legal or regulatory duty to do so, we may disclose your details to the police, regulatory bodies, or legal advisors, and/or, where we consider this necessary, to protect the rights, property or safety of Age UK Stockport, its personnel, visitors, users or others. See more below.

### EXCEPTIONAL CIRCUMSTANCES

There are exceptional circumstances where we may share your information if there is a risk to you or to someone else or where we have a legal duty to do so.

Any decision to share your information would be made very carefully after considering all the facts and where possible you would be informed in advance.

For example, we cannot legally provide confidentiality in the following situations:

- where legal action forces us to disclose specific information, eg as part of a criminal investigation
- where information has been provided to us about a terrorist suspect or about an act of terrorism that will take place, or has taken place, anywhere in the world.
- where there is a legal requirement such as in accordance with the application of the Mental Incapacity Act 2005

We may also decide to break confidentiality when:

- it would be in the public interest to do so or not breaking confidentiality would hinder a criminal investigation
- we believe that a user is in severe and immediate danger or is about to place another person in great danger.
- where there is a disclosure relating to allegations of abuse or there is a suspicion that abuse is happening

### Keeping information up to date

We really appreciate it if you let us know if your contact details change.

We may use information from public external sources such as the post office and/or the public electoral roll so that we can check / update our records. We only use sources where we are confident that you've been informed of how your information may be shared and used.

This activity also prevents us from having duplicate records and out of date preferences, so that we don't contact you when you've asked us not to.

### Your Rights

Under UK data protection law and GDPR, you as an individual have rights over the personal information that we hold about you. We've summarised these below:

#### 1. The right to be informed

You have the right to be informed about the collection and use of your personal data. This is a key transparency requirement under the GDPR and we have developed our Privacy Notice and this Privacy Policy to keep you informed. We will also keep you informed of any changes to our policy and procedures – see below.

#### 2. The right of access

You have a right to request access to the personal data that we hold about you. This is commonly referred to as **subject access** request. You also have the right to request a copy of the information we hold about you, and we will provide you with this unless legal exceptions apply. You can make a subject access request verbally

or in writing setting out what you want us to provide and we will generally have one month to respond without any charge to you. We maintain a Subject Access request Policy and process to support and enable us to respond to this right.

### 3. The right to rectification

We want to hold accurate information about you, and you have the right to have inaccurate or incomplete information we hold about you corrected. If you believe the information, we hold about you is inaccurate or incomplete, please provide us with details and we will investigate and, where applicable, correct any inaccuracies within one month.

### 4. The right to erasure

This is sometimes called the 'right to be forgotten'. You may ask us to delete some or all your personal information and in certain cases, and subject to certain exceptions, you have the right for this to be done within one month of you requesting.

### 5. The right to restrict processing

You have a right to ask us to restrict or suppress the processing of some or all of your personal information in certain circumstances. These circumstances are set out at the ICO website [ico.org.uk](https://ico.org.uk)

### 6. The right to data portability

The right to data portability allows you to obtain and reuse your personal data for your own purposes across different services by moving, copying or transferring personal data from one IT environment to another in a safe and secure way, without affecting its usability. The right only applies to information you have provided.

### 7. The right to object

The GDPR gives you the right to object to the processing of your personal data in certain circumstances. This includes an absolute right to stop data being used for direct marketing.

If you want to exercise any of the above rights, please contact us as detailed below. We may need to ask for further information and/or evidence of identity. We will endeavour to respond fully to all requests within one month of receipt of your request, however if we are unable to do so we will contact you with reasons for the delay.

### 8. Rights in relation to automated decision making and profiling.

There are special rights in relation to all automated decisions or profiling, that is solely by automated means without any human involvement. We do not undertake any automated processes.

NOTE: Please note that exceptions apply to a number of these rights, and not all rights will be applicable in all circumstances. For more details we recommend you consult the guidance published by the [Information Commissioners Office](#) (link is external).

### Changes to the Policy

We may change this Privacy Policy from time to time. If we make any significant changes in the way we treat your personal information we will make this clear on the Age UK Website or by contacting you directly.

### Feedback

If at any time you would like to contact us with your views about our privacy policy or practices, or if you are unhappy with any aspect of how we are using your personal information we'd like to hear about it. We appreciate the opportunity this feedback gives us to learn and improve. You can contact us as below.

### Contact us

If you need any further information from Age UK Stockport please contact us via [info@ageukstockport.org.uk](mailto:info@ageukstockport.org.uk) or write to us at Commonweal, 56 Wellington Street, Stockport SK1 3AQ.

or with any enquiry relating to your personal information, you can do so by sending an email to us at [info@ageukstockport.org.uk](mailto:info@ageukstockport.org.uk) or telephone us at 0161 480 1211.

You can also ask to speak directly to the Data Protection / Information Governance Lead (Operations Manager Services) or the Senior Information Officer (the Chief Executive).

### Further Information & Complaints

For further information on Data Protection Laws generally please see the Information Commissioners Office website [ico.org.uk](https://ico.org.uk)

You also have the right to lodge a complaint about any use of your information with the Information Commissioners Office, the UK data protection regulator. It can investigate compliance with data protection law and has enforcement powers. Complaints can be reported directly on the website [Information Commissioners Office \(link is external\)](#).

## APPENDIX DEFINITIONS:

<b>consent</b>	any freely given, specific, informed unambiguous indication of the data subjects' wishes by which he or she, by a clear statement or by a clear affirmative action, signifies agreement to the processing of personal data relating to him or her.
<b>criminal records information</b>	means personal information relating to criminal convictions and offences, allegations, proceedings, and related security measures;
<b>data breach</b>	means a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal information;
<b>data subject</b>	means the individual to whom the personal information relates;
<b>Legitimate interests</b>	processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data, in particular where the data subject is a child
<b>personal information</b>	(sometimes known as personal data) means information relating to an individual who can be identified (directly or indirectly) from that information;
<b>processing information</b>	means obtaining, recording, organising, storing, amending, retrieving, disclosing and/or destroying information, or using or doing anything with it;
<b>sensitive personal information</b>	(sometimes known as 'special categories of personal data' or 'sensitive personal data') means personal information about an individual's race, ethnic origin, political opinions, religious or philosophical beliefs, trade union membership (or non-membership), genetics information, biometric information (where used to identify an individual) and information concerning an individual's health, sex life or sexual orientation.