

Privacy Policy

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What this privacy policy covers

Age UK Bournemouth, Poole and East Dorset is committed to protecting the individual's personal information and to being transparent about the information we hold, why we need it, how we use it and the individual's rights in regard to it.

Who we are

Age UK Bournemouth, Poole and East Dorset is an independent charity dedicated to working with the over 55's living in Bournemouth, Poole, East Dorset & Christchurch. Age UK Bournemouth, Poole and East Dorset is a registered charity (No. 1113294) and company limited by guarantee (No. 5401464). The registered address is Age UK Bournemouth, Poole and East Dorset, 700 Wimborne Road, Winton, Bournemouth, BH9 2EG. We comprise Age UK Bournemouth, Poole and East Dorset and our trading subsidiary, Age UK Dorset Enterprise Limited.

What we need

Age UK Bournemouth, Poole and East Dorset will be the 'Controller' of the personal data provided to us. Personal data which we collect about individuals may include their name, address, date of birth, contact numbers, etc. However, for some of our services we may need to collect other data regarding clients' health, etc. We will always ensure that there is a legitimate interest for collecting information and we will not collect any personal data from individuals that we do not need.

How do we collect information?

We obtain information about individuals in various ways, for example, when clients use our services, contact us about products and services, donate to us or use our website.

Why we need this information

We need to know basic personal data in order to provide individuals with the services they have requested or the assistance they require. We will not collect any personal data we do not need.

What we do with the information

All the personal data we process is processed by our staff or volunteers. Irrespective of where the data is stored, no third parties have access to clients' personal data unless the law allows them to do so.

How long we keep information

Any information we collect that is used for the purpose of providing the service(s) requested will be kept with us for as long as we need it in order to provide and oversee this / these service(s). Any information we have collected that we may use for marketing purposes (and for which individuals have given explicit consent) will be kept with us until the individual notifies us that they no longer wish us to hold the data.

How we use the 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:

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.

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, 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

further our charitable objectives

register, administer and personalise online accounts when you sign up to classes or activities 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.

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.

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 Bournemouth, Poole and East Dorset 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.

How long we keep your information for

Age UK BPED 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 Bournemouth, Poole and East Dorset, 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

What are the individual's rights?

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:

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.

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.

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.

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.

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

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.

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.

If at any point you believe the information we process is incorrect they can request to see this information and have it corrected, or, if they wish, deleted. Should they wish to raise a complaint regarding how we have handled their personal data, they can contact the Chief Executive at the email address below who will investigate the matter. If after that they are not satisfied with our response or believe we are failing to process their personal data in accordance with the law, they can complain to the Information Commissioner's Office (ICO).

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.

01202 530530

sarah.lloyd@ageukbped.org.uk

Further Information & Complaints

For further information on Data Protection Laws generally please see the Information Commissioners Office website 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).