

# Privacy Statement

Version Control			
Version	Author	Date	Changes
0.1	Simon Allen	20/09/2023	New Policy
0.2	Simon Allen	21/11/2024	Updated after our Quality Audit for Information and Advice Services

0.3	Simon Allen	29/05/2025	Updated to reflect to contractual arrangements
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## Privacy Policy

### 1. Introduction

Age UK Bath & North East Somerset is committed to protecting your privacy and security and ensuring you remain informed and in control of your information.

This policy explains when we use your personal information, how we use it, how we keep it secure, and in what circumstances we may share it with other organizations.

We want to make sure you remain in control of your personal information. Part of this is making sure you understand your legal rights, which are as follows:

- the right to confirmation as to whether or not we have your personal data and, if we do, to obtain a copy of the personal information we hold (this is known as a **subject access request**)
- the right to have your data erased, though this will not apply where it is necessary for us to continue to use the data for lawful reason.
- the right to have inaccurate data rectified.
- the right to object to your data being used for marketing or profiling.
- you have the right to personal data you have provided to us which we process automatically on the basis of your consent or the performance of a contract. This information will be provided in a common electronic format.
- Sometimes there might be exceptions to the rights above; we will always try to respond to your satisfaction, but there may be a situation where we are unable to do so.

## **2. Associated Documents/Legal Requirements**

Confidentiality Policy

Data Protection Policy

GDPR Policy

Email, Telephone, and Internet Policy

Data Protection Act 2018

## **3. Who does the policy apply to?**

All Users of Age UK Bath & North East Somerset Services

## 4. What is the Age UK Bath & North East Somerset policy?

### **Collecting Information about you**

We collect information about you when you use one of our services, volunteer with us, donate to us, or contact us through social media. This is generally done through an application or referral form, and you provide us with the information.

In accordance with data protection regulations, we may process personal data based on our legitimate interests. This lawful basis allows us to process data in ways that are reasonably necessary to achieve our business objectives, provided that such processing does not override the rights and freedoms of individuals. Legitimate interests may include activities such as improving our services, enhancing user experience, conducting market research, and ensuring the security of our systems. We carefully assess and balance any potential impact on individuals' privacy rights before relying on legitimate interests as a basis for processing personal data.

### **Information we collect.**

The personal information we collect will include your name, address, age, contact details, and your next of kin contact details in case of an emergency. Sometimes we might need to know a little bit about your health. This information will only be held with your explicit consent.

For monitoring purposes, we will ask you for your ethnic background. This information will only be held with your explicit consent. It will not restrict your access to services should you choose not to provide this information.

If you are a member of staff or volunteer with us then we will collect extra information about you, e.g., references, criminal records check, professional certificates, emergency contact details, medical condition. This information will be retained for legal reasons, to protect us including in the event of an insurance or legal claim, and for safeguarding purposes.

## **Donors**

If you are a donor, we will collect financial information (direct debit / standing order details), and whether your donations are gift aided.

## **How we use your information**

To be able to support you in the service you use, for example providing the information you might need.

To seek your views or comments on the services we provide.

To notify you of changes to our services.

To send you communications which you have requested.

To contribute to our future service development to ensure that our services are fully accessible, and they are what you want and need.

## **Holding your information**

We will hold your personal information on our systems for as long as you are registered for our services and then for 6 years after that. Volunteer information will be kept for 3 years after leaving.

After this time, we will aggregate and anonymise personal data. This information can be used for a variety of purposes, such as reporting to funders and identifying trends to help inform our actions and improve our services.

### **Storing your information**

Age UK Bath & North East Somerset are based in the UK, and we store our data within the European Union. Some of our computer systems use Microsoft products. As Microsoft is a US company, using their products might result in personal data being transferred to or accessible from the US. This is allowed, your personal data will still be adequately protected.

### **Protecting your information**

We employ a variety of physical and technical measures to keep your data safe and to prevent unauthorised access to or use or disclosure of your personal information. Electronic data and databases are stored on secure computer systems, and we control who has access to information.

Our staff receive data protection training, and we have a set of detailed data protection procedures which staff are required to follow when handling personal data.

### **Sharing your information**

We will never sell your personal data and will only ever share it with organizations we work with where necessary and if your data's privacy and security are guaranteed.

If you request that we refer you to a third-party organisation, we will only undertake this with your permission.

Through our contracts with Bath & North East Somerset Council, Wiltshire Council and HCRG Care Group Ltd, (acting on behalf of Bath & North East Somerset, Swindon and Wiltshire Integrated Care Board) , we are sometimes required to share personal information (name, address, age, ethnic background, religious belief) for people using our Information & Advice Service, Home from Hospital Service, and our Day Centres.

Details of how these organisations protect your information is available on their websites:

Bath & North East Somerset Council: <http://www.bathnes.gov.uk/disclaimier-and-privacy-statement>

Wiltshire Council: <https://www.wiltshire.gov.uk/article/5382/Adult-care-services-privacy-policy>

HCRG Care Group: [Privacy and Cookies Policy - HCRG Care Group - Community Health and Care Services](#)

We are also sometimes required to share personal information (name, address, age, ethnic background) and other anonymised data with our funders for the purpose of enabling them to monitor the success of the services they fund us to offer.

## **Disclosure**

Age UK Bath & North East Somerset has a legal duty to disclose some information including:

- Safeguarding concerns will be reported to children's Services / Adult Social Care
- Drug trafficking, money laundering, acts of terrorism or treason will be disclosed to the police.
- If an illegal act has or is believed to have taken place it will be reported to the appropriate authorities

Age UK Bath & North East Somerset will always inform you of any disclosure

## **Marketing**

Age UK Bath & North East Somerset does not undertake unsolicited marketing and will not sell, rent, or otherwise share your information to third parties for marketing purposes.

We do send out information about our services and updates relating to older people, their carers, volunteers, and donors which relates to initiatives, activities, and requests for support unless you have given permission for us to send you this information.

Should you no longer wish to receive this information at any point simply let us know and we will ensure you are removed from our mailing list:

**Email:** [reception@ageukbanes.co.uk](mailto:reception@ageukbanes.co.uk)

**Post:** Data Processor, Age UK Bath & North East Somerset, The Studio, Alexander House, James Street West, Bath, BA1 2BT  
Phone: 01225 466135 Mon-Fri 9.30 – 3.30

If you have opted-in to communications from us, we may contact you with information about our partners and their services, but these communications will always come from Age UK Bath & North East Somerset.

## **Fundraising**

As a local independent charity, we rely on donations and support from others to continue our work. From time to time, we will contact services users, volunteers, and supporters with fundraising material and communications. This might be about an appeal or to suggest ways you can raise funds (e.g., Bath Half, quiz nights, or buying a service, e.g. 'At Home' where Age UK Bath & North East Somerset receives the surplus).

We will only contact you specifically about fundraising if you've 'opted in' to receiving marketing from us (you can unsubscribe at any time).

If you decide to donate to us, then we will keep records of when and how much you give to a particular cause.

## **Profiling**

Age UK Bath & North East Somerset does not analyse your personal information for profiling purposes.

### **Questions**

Any questions you may have about this policy or how we use your personal data should be sent to:

Email [reception@ageukbanes.co.uk](mailto:reception@ageukbanes.co.uk)



Post Data Processor Age UK Bath & North East Somerset, The Studio, Alexander House, James Street West, Bath, BA1 2BT  
Phone 01225 466135 Mon-Fri 9.30 – 3.30

## Complaints

You can complain to Age UK Bath & North East Somerset directly by contacting our Data Controller using the details above. If you wish to make a complaint which does not directly relate to your data protection and privacy rights, you can do so in accordance with our complaints policy.

If you are not happy with our response, or you believe that your data protection or privacy rights have been infringed, you can complain to the UK Information Commissioner's Office (ICO) which regulates and enforces data protection law in the UK. Details of how to do this can be found at [www.ico.org.uk](http://www.ico.org.uk)

## 5. Who is responsible for implementing the policy?

The **Board of Trustees** have formally approved the Privacy Policy and are responsible for its top-level commitment.

**Senior Managers** are responsible for establishing a culture where the Privacy Policy is promoted. Senior Managers will ensure that all aspects of the Privacy Policy are applied appropriately and that their behaviours/actions demonstrate the commitment to the code.

**Employees and Volunteers** are responsible at all times for their own conduct, behaviour and ensure that they work at all times legally and ethically. All staff members should ensure that they read, understand, and act within the guidance set out in this Privacy Policy.

## 6. Equalities Statement

Age UK Bath & North East Somerset commits itself to fairness and equality for all, operating with professionalism, integrity, and openness. Throughout our policies and practice, we aim to make sure we do not knowingly create an unfair disadvantage for anyone, directly or indirectly. Employees must embrace this commitment.

Volunteers/employees should ensure that no person or group of people receiving services from or applying for accommodation, employment or contracts with Age UK Bath & North East Somerset, will be treated less favourably than any other person or group of people because of their gender (and including gender reassignment), sexual orientation, marital or civil partnership status, race, colour, ethnic or national origin, nationality, religion or belief, political beliefs, disability, age, class, responsibility for dependents, part time or shift workers, unrelated criminal offences or any other matter which causes a person to be treated with injustice.