

## Privacy Notice – Contract and Legal Obligation

### Day Care, Wellbeing Activities, Nail Care, Falls Prevention and other contracted services at Age UK Birmingham

When using contracted services supplied by **Age UK Birmingham (AUKB)**, **AUKB** will act as “*Data Controller*” (i.e. the organisation keeping and processing your information) with regard to the data you provide.

#### Information gathered:

To be able to provide our service to you we will need to ask you for information such as your name and contact details. We will need to process and store this information making you a “*Data Subject*”. The information provided will not be used for any form of profiling or automated decision making. The relevant data we may ask for depends on the type of service provided when you use our day centres. Relevant data we may ask for is listed below:

Name(s)	Address
Email address when applicable.	Telephone number(s).
Date of birth	National Insurance number
The electoral ward that you live in	Medical conditions/disabilities
Marital status	GP name/surgery details
Relationship with another service user (if at the same address)	Emergency contact details (next of kin etc. – you must have permission to provide their details)
NHS number	Living arrangements
Accommodation details	Any further details needed for the service that you are using that you are happy for us to record.
Ethnic group	
Religious group	

Your personal data be used to create a database record for you, as an individual, on a secure content management system (CMS) called **CharityLog** - see [www.charitylog.co.uk](http://www.charitylog.co.uk). Charitylog is the trading name of Dizions Ltd; Company Reg: SC340502 registered in Scotland.

CharityLog utilizes secure cloud data storage in data centres run by Amazon Web Services (AWS) with multiple secure backups of the data (in separate locations), in data centres within the UK. AWS staff do not have access to your data. Dizions staff do not have access to your data unless specifically instructed by AUKB and only temporarily in the cases of technical support or data migration. In these limited cases Dizions acts as a “*Data Processor*” on behalf of, and under specific instruction from, AUKB as the “*Data Controller*”.

Electronic scans of your membership and other forms may be created and attached to your CharityLog CMS database record, and/or stored in a restricted access area of our computer system. Information provided to 3rd parties such as Age UK (national), the NHS or Birmingham City Council will be anonymised for statistical use only. Un-anonymised information will usually only be provided to 3rd parties with your express permission on a case by case basis. The only exception to this is where sharing your information is required by law or to protect your health and wellbeing (including safeguarding)

The physical copies of your information (such as the original forms filled out) will be stored securely and the information may also be used to create rotas and other documents required by the running of the day centre or activities.

Your database record may be updated with information regarding the care and activities we do with or for you. If you haven't been in contact with us for 18 months we may try to contact you. If we have had no contact with you for over 24 months, or you specifically request us to "forget" you after you have stop using the service, your database record will be anonymised. The resulting anonymous record will only be used for statistical analysis from that point. Physical membership records at the centres will be destroyed after 12 months of the end of membership. Other records of a financial nature will be retained intact for 6 years as they will be required by law.

For the purposes of administering your record and delivering the service we will process your information under the lawful basis of "contract". As part of this certain financial records may pass into processing under the lawful basis of "legal obligation" with regard to maintaining correct auditable financial records as a charity and limited company. The only exceptions to this will be if we have to share your information with a third party as required by law (at which point the data processing will fall under the lawful basis of "legal obligation"), or if your life is in danger (at which point the data processing will fall under the lawful basis of "vital interests", for example to give your details to a paramedic). If you engage in another of our services which requires you to provide information, that service's Privacy Notice will govern how your data is collected and processed for that service.

Any special category data, such as medical information, is collected and processed under the condition that it is necessary for the provision of health or social care (as stipulated by law) and the monitoring of that provision.

### **Your rights:**

Under Data Protection laws regarding personal data of England and/or the United Kingdom of Great Britain and Northern Ireland:

- You have the right to be informed (e.g. this privacy notice and the option to receive a copy.)
- You have the right at any time (within reason) to request a copy of the records about you.
- You have the right to request a correction or completion of personal data held about you where it is incorrect or incomplete.
- You have the right to data portability (your record turned into a form that can be supplied at your request to another organisation).
- You have the right to complain to AUKB and/or the Information Commissioner's Office (ICO – [www.ico.org.uk](http://www.ico.org.uk)) if you believe your data is being dealt with incorrectly, inappropriately or illegally.
- You have the right to request erasure or to be "forgotten" (your record anonymised) if you are no longer using the service.
- You have the right to request the restriction the processing of your data (your record preserved as it is, but not processed) if you are no longer using the service.
- You have the right to object to your personal data being processed under specific circumstances and to request it is stopped and/or you are no longer contacted if you are no longer using the service.

To exercise any of your rights please write to us at either the address or email address below, or visit us during the posted hours of opening to make a request in person. We may require identification to be able to authorise the request. We will then respond in writing within **30 days**.

**Age UK Birmingham (AUKB)** is a registered charity (number 1138240) and company limited by guarantee (number 7334392). **Age UK Sandwell (AUKS)** is a trading name of Age UK Birmingham. The registered address is Age UK Birmingham and Age UK Sandwell, Stratford House, Stratford Place, Birmingham, B12 0HT. The organisation can also be contacted by telephoning 0121 437 0033 or emailing [info@ageukbirmingham.org.uk](mailto:info@ageukbirmingham.org.uk) for any Information and Advice enquiry or with any data protection enquiries for the *Data Protection Lead*. AUKB is registered with the *Information Commissioners Office* as a *Data Controller*.