

# Privacy Notice

## Information and Advice (only) at Age UK Birmingham and Age UK Sandwell

When using our Information and Advice service **Age UK Birmingham (AUKB)** will act as “*Data Controller*” (i.e. the organisation keeping and processing your information) with regard to the data you provide (including when delivery is via Age UK Sandwell.)

### Information gathered

To process your enquiry we may ask you for information such as your name and contact details; we will also ask for permission 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. You are not required to give consent to use the service but please be aware the quality of any later service may be impacted due to us not being able to review past case work. If you decide not to grant permission the details of your case or enquiry will be recorded anonymously for statistical analysis and audit purposes only.

The relevant data we may ask for depends on the type of case work undertaken when you use our Information and Advice service. 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	Marital status
GP name/surgery details	Medical conditions/disabilities
Emergency contact details (next of kin etc. – you must have permission to provide their details)	Relationship with another service user (if at the same address)
Accommodation details	Living arrangements
Ethnic group	Religious group
NHS Number	Any further details needed for case work that you are happy for us to hold (verbal consent will be requested at the time.)

If you give verbal or written consent for your personal data to be kept a database record for you as an individual will be created on a secure content management system called **CharityLog** - see [www.charitylog.co.uk](http://www.charitylog.co.uk). Charitylog is the trading name of Dizons Ltd; Company Reg: SC340502 registered in Scotland.

CharityLog utilizes secure cloud data storage in data centres run by RackSpace with multiple secure backups of the data (in separate locations), in data centres within the UK. RackSpace staff do not have access to your data. Dizons 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 Dizons acts as a “*Data Processor*” on behalf of, and under specific instruction from, AUKB as the “*Data Controller*”.

For telephone or other contacts not in person, verbal consent is recorded with time and date on the client’s CharityLog record. In the case of a face-to-face meeting (where a consent form will be filled out, if consent is granted), an electronic scan of the client’s consent form will be created and attached to the client’s CharityLog CMS database record, as will other case-related documentation with the client’s consent.

## **Who has access to your information**

If you have used our services, we may on occasion share basic anonymised demographic and service information with Age UK (the national charity), local authorities specifically where we hold contracts for service delivery (Birmingham City Council, Sandwell Metropolitan Borough Council, Dudley Metropolitan Borough Council, Walsall Council and the West Midlands Combined Authority), or the NHS in all its forms 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. Un-anonymised information will usually only be provided to 3rd parties with your express permission on a case by case basis, to assist you with a previously discussed problem prior to data sharing. The only exception to this is where sharing your information is required by law or to protect your health and wellbeing (safeguarding).

The physical copy of your consent form, any other physical data/document not returned to you, and any electronic copies not attached to your record, will be kept secure and securely destroyed within **14 days** of the scan being added to your database record. If you consent to a customer satisfaction survey, once it has been conducted, the physical form produced and a scan of it will be kept on file for 6 years for quality assurance purposes, separate to your CharityLog CMS record. Anonymous statistical analysis will be performed with the information given in the surveys.

Your database record may be updated with information regarding the case work we do with or for you, and you will be informed verbally or in writing of any data being recorded at the time of the record being created. If you haven't been in contact with us for 18 months we may try to contact you to renew consent. If we have had no contact with you for 24 months, your active case will be closed and will enter a period of 6 years of legally obligated storage (see below). If you request anonymisation prior to case closure your record will be anonymised and used only for statistical analysis. Anonymised records by definition can no longer be identified as yours and thus the decision and action to anonymise cannot be reversed.

## **Lawful Basis**

For the purposes of administering your record and delivering the support you need our Information and Advice service will process your information under the lawful basis of "consent" once your consent has been given. 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. When your Information and Advice case is closed the data is then stored for 6 years under the lawful basis of "Legal Obligation" rather than "Consent".

If after storage of a case moves in to the 6 year legal obligation period you wish to open another Information and Advice case, the new case will be processed under a renewed period of consent, but the previous case(s) will remain stored under legal obligation. If you decide that if the details of the new case shouldn't be processed un-anonymously, they will be moved to an anonymous record for statistical analysis leaving the prior cases and file intact as required by legal obligation. Any case or file information protected under the storage processing of legal obligation cannot be anonymised or deleted as this would contravene the legal obligation basis of processing (inc. storage).

Any special category data, such as medical information, is collected with your explicit consent to allow the processing of your enquiry and the provision of the support of the Information and Advice service. The storage of any special category data after the closure of the case will be under the basis of processing of legal obligation.

### **Your rights**

Under Data Protection laws regarding personal data of England and/or the United Kingdom of Great Britain and Northern Ireland – ***ie The Data Protection Act 2018 including the 2021 UK GDPR:***

- 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 unanonymised 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 except where anonymised.
- You have the right to data portability (your record turned into a form that can be supplied at your request to another organisation) except where anonymised.
- 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) unless the case is closed and your information is being held under the legal basis of "Legal obligation".
- You have the right to request the restriction the processing of your data (your record preserved as it is, but not altered).
- 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.

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. Any consent provided by telephone call can be retracted in the same way. We will require identification to be able to authorise the request. We will then respond in writing within **28 days**.

**Age UK Birmingham (AUKB)** is a registered charity (number 1138240) and company limited by guarantee (number 7334392). 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*.