

## Privacy Policy

Age UK Croydon is committed to respecting your privacy and protecting the security of the personal information you share with us. This policy explains when and why we collect personal information about you, how we use it, the conditions under which we may disclose it to others, how we keep it safe and secure and your rights and choices in relation to your information.

Whenever you share your personal information with us, we will:

- always be clear about what information we are collecting and will not do anything with it that you would not reasonably expect us to do.
- always ensure that any use of your information has a firm basis in current UK data protection legislation, and we will only ever store your information for as long as is necessary for the reasons we collected it.

This Privacy Policy applies to Age UK Croydon and Age UK Trading Limited.

Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it.

This policy may change from time to time, so please check this page periodically. Age UK Croydon is a registered charity (number 1081013) and company limited by guarantee (number 3921436). Age UK Croydon Trading Limited (Company Number 05792724. The registered address is Age UK Croydon, 81 Brigstock Road, Thornton Heath, CR7 7JH. We are also registered with the Information Commissioners Office [ Z5300599].

### Cookies

Cookies are tiny software files that are stored on a computer or mobile device when an individual visits a website. Cookies allow websites to recognise that a user on an individual computer has previously visited the site. The cookies save some information about that user for when they access the site again in the future. You can find out what cookies the Age UK Croydon website uses in the table below.

For more information about the different types of cookie, visit the [About Cookies website](#).

Cookie	Purpose
User Setting	This functional cookie remembers the individual's colour and location preferences so that next time they use the site these are displayed rather than the sites default settings.
ASP .Net _Session Id	When you access this website a cookie is generated with a unique session ID. This cookie will expire when the browser is closed.
vidi	This cookie enables Age UK's Intellitracker software that helps us analyse information such as visitor numbers and browser usage so we can continue to improve your experience of our website.

BCSI-CS-5B059C53EB35D97E	The information in this cookie is used to track the activities of individuals who have visited this site via third-party websites.
__utma / __utmb / __utmc / __utmz	Age UK uses a tool called Google Analytics to give us statistical data on the performance of our website. These cookies are placed by Google Analytics.

**How we use your data**

Age UK Croydon collects, stores, and uses (collectively referred to as “processes”) personal data relating to people who interact with us – this includes clients, volunteers, supporters and staff, as well as people who are referred to us by other people or organisations. We may use your personal information to:

- Offer you advice and support.
- Provide you with any services you request from us.
- Process any job or volunteer applications you send to us.
- Fulfil any contracts you enter with us.
- Manage and process any donations you make to us or legacies you leave us.
- Contact you regarding our services and any events or activities we run.
- Analyse any feedback or survey responses you give us.
- Let you know about any changes to any of our services that you use.
- Anonymously evaluate the performance of our services

**Who we share information with.**

We use services offered by third party organisations to help us manage some functions of our charity, such as Charitylog to store your personal details and Just Giving [Giving.Com.Ltd, an entity established under the laws of England & Wales] to process donations. Before we use any third-party organisation’s services, we put in place contracts that contain data protection clauses and/or ensure the organisation has appropriate data protection measures and policies in place to ensure your personal information is protected.

If while we are supporting you, we think you may benefit from the services or support another organisation provides, we may share some of your information with them. This can include other charities, or statutory bodies, such as Croydon Social Services. We will tell you what information we plan to share and ask for your consent to share it before we share anything unless we are required to share the information to comply with relevant legislation or to protect your vital interests.

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.

**What information we collect.**

The kinds of information we process about you will vary depending on the support we are giving you and the purposes we are collecting it for. This may include:

- Your name
- Your address and post code
- Your contact details (such as telephone number and email address)
- Details relating to next of kin or emergency contacts.
- Your gender

- Your age
- Whether or not you are a carer
- Details of any interactions we have had with you, such as home visits or telephone conversations and any services or support we are offering you.

Sometimes we may ask you for more sensitive information (also known as **special category data**). We will only ask for this information when it is necessary for the support, we are providing you with (for example, we may ask about any health conditions you have while supporting you with a benefits application, or when offering one of our social care services to you).

### **Lawful Basis**

Whenever we process information about you, we are required to have a lawful basis to do so. The lawful bases we rely upon are:

- **Consent** – in some cases we rely on consent to process information, for example when we provide a service to you, if you sign up to our newsletter or if we think you may benefit from us sharing your details with another organisation. Where we rely on consent, we will ask you to explicitly indicate that you consent to us storing your data on our secure systems. In most cases this may take the form of a signed consent form, but occasionally we will ask you to provide verbal consent which will be recorded on our data management system.
- **Legitimate interests** – we may rely on this basis in limited circumstances where appropriate, for example if you have told us you intend to leave us a legacy.
- **Legal obligation** – we may rely on this basis when we are required to process information to comply with our legal obligations, for example to prevent fraud or fulfil our safeguarding responsibilities under the Care Act 2014
- **Contract** – we may process your personal information if you enter a contract with us, such as paid for services we may provide.
- **Vital interests** – we may process and/or share your information under this basis if not doing so would put your life in significant danger.
- **Legitimate Interest**

Whenever we rely on legitimate interests, we take extra care to ensure that we only process personal information that is necessary for the support we are offering you. We always balance our legitimate interests against yours to ensure that we have a sound justification for processing your personal information and that the methods we use and information we ask for are as unintrusive as possible.

For details of the lawful bases that we rely on for each individual service, please contact at [DPO@AgeUKCroydon.Org.UK](mailto:DPO@AgeUKCroydon.Org.UK)

### **Your Choice**

You have a choice about whether you wish to receive information from us. If you do not want to receive direct marketing communications from us about the vital work we do for older people and our services, then you can select your choices by ticking the relevant boxes situated on the form used to collect your information.

We're committed to putting you in control of your data so you're free to change your marketing communication preferences (including to tell us that you don't want to be contacted for marketing purposes) at any time using:

[AUKC@AgeUKCroydon.Org.UK](mailto:AUKC@AgeUKCroydon.Org.UK) or telephone 0208 683 7100

We will not use your personal information for marketing purposes if you have indicated that you do not wish to be contacted and will retain your details on a suppression list to help ensure that we do not continue to contact you. However, we may still need to contact you for administrative purposes like where we are processing a donation or thanking you for your participation in an event.

### **Your Rights**

Whenever you provide us with personal information, you have various rights available to you relating to how we process it. These rights are:

- **The right to be informed** - You have the right to know what information we collect and store about you, why we collect the information and what we do with it
- **The right to access** - You have the right request a copy of any information that we store about you, and we are required to respond to your request within 30 days.
- **The right to rectification** - If your information we store about you is incorrect, you have the right to request that we correct it.
- **The right to erasure (aka “the right to be forgotten”)** - You have the right to request that we remove all personal information that we store about you. This can either result in information being anonymised, suppressed or erased, depending on the information that we hold.
- **The right to restrict processing** - You have the right to restrict how we process your information if; (a) you are contesting the accuracy of the information, (b) you believe the data has been processed unlawfully and you would prefer that we restrict the processing of the information instead of erasing it, (c) you believe we no longer need the information but want us to retain it in order for you to establish, exercise or defend a legal claim or (d) you have objected to our processing of the information and we are currently investigating the objection
- **The right to data portability** - In some cases you have the right to request a portable copy of your information in a commonly used, machine readable format.
- **The right to object** - You have the right to object to us processing your personal information.

If you would like to exercise any of the above rights or would like any further information about them, you can contact us at [DPO@AgeUKCroydon.Org.UK](mailto:DPO@AgeUKCroydon.Org.UK)

### **How to access your information**

If you would like to know what information we currently hold about you, you can submit a Subject Access Request to us. Your information will usually be provided to you free of charge. When you submit a request, we are required to respond to you within 30 days. Please contact us using the email address [DPO@AgeUKCroydon.Org.UK](mailto:DPO@AgeUKCroydon.Org.UK).

***Please be aware that to protect the security of the information we hold, we may ask you to provide identification documents to confirm you have the right to access the***

***information you are requesting.***

### **How long we store your information.**

We will only store your information for as long we are required to fulfil the purpose that it was collected for. This length of time depends on various factors, including the support we are offering you and whether we need to keep the information to comply with any current legislation for example, we are legally required to hold some types of information to fulfil our statutory and regulatory obligations (e.g., health/safety and tax/accounting purposes including Gift Aid). Any information we no longer need is either deleted or anonymised.

### **Security precautions in place to protect the loss, misuse or alteration of your information**

When you give us personal information, we take steps to ensure that it is treated securely. Any sensitive information (such as credit or debit card details) is encrypted and protected with the following software 128 Bit encryption on SSL.

When you are on a secure page, a lock icon will appear on the bottom of web browsers such as Microsoft Internet Explorer.

Non-sensitive details (your email address etc) are transmitted normally over the Internet, and this can never be guaranteed to be 100% secure. As a result, while we strive to protect your personal information, Age UK Croydon Group cannot guarantee the security of any information you transmit to us, and you do so at your own risk. Once we receive your information, we make our best effort to ensure its security on our systems. Where we have given (or where you have chosen) a password which enables you to access certain parts of our Sites, you are responsible for keeping this password confidential. We ask you not to share your password with anyone.

### **Stipulations regarding use of the discussion boards**

Any communication or material that you transmit to, or post on, any public area of the Site including, but not limited to, any data, questions, comments, suggestions, reviews, or the like, is, and will be treated as, non-confidential and non-proprietary information. When entering the discussion forum, you agree not to publish, post, disseminate distribute or otherwise transmit any defamatory, offensive, infringing, indecent or otherwise unlawful or objectionable material or information.

Age UK Croydon Group will not be responsible for the posting by any user of any defamatory, obscene, or otherwise unlawful material. Age UK Croydon Group has the right to remove any material or posting you make on this Site at its discretion.

### **What happens when visitors link to another site?**

Our Site contains links to other websites. This privacy policy applies only to our Site, so visitors should always be aware when they are moving to another site and read the privacy statement of any site which collects personal information. We cannot be responsible for the privacy policies and practices of other sites even if you access them using links from our Site.

We do not pass on any personal information about our visitors to any other site. In addition, if you linked to this Site from a third-party site, we cannot be responsible for the privacy policies and practices of the owners and operators of that third party site and recommend that you check the policy of that third party site and contact the owner or operator if you have any concerns or questions.

### **16 or Under**

If you are aged 16 or under, please get your parent/guardian's permission beforehand whenever you provide personal information to the Site. Users without this consent are not allowed to provide us with personal information.

### **Contact us:**

If at any time you would like to contact us with your views about our privacy practices, or with any enquiry relating to your personal information, you can do so by sending an e-mail to us at [DPO@ageukCroydon.org.uk](mailto:DPO@ageukCroydon.org.uk) or telephone us at 0208 683 7100

### **Data Protection**

The Age UK Croydon would like to keep in touch with you to let you know about the vital work we do for older people, our products, and services. By submitting your email, address, and phone number(s) on our Site, you are agreeing to being contacted in these ways by Age UK Croydon and its group of companies. You can unsubscribe from these communications at any time.

If you do not wish to continue receiving information from us or carefully selected third parties, please email us at [DPO@ageukcroydon.org.uk](mailto:DPO@ageukcroydon.org.uk) or telephone us at 0208 683 7100.

### **Complaints**

We welcome, and take seriously, all complaints and feedback about our work. If you make a complaint to us, we will collect and use your information to respond to your concerns. If your complaint relates to an area of our work where we employ a third-party processor or product provider, we may share your personal information with that third party to investigate your concerns.

We will keep a record of your complaint for 2 years from the date that we deem the complaint closed. You can also complain to the ICO if you are unhappy with how we have used your data.

The ICO's address:

Information Commissioner's Office

Wycliffe House

Water Lane

Wilmslow

Cheshire

SK9 5AF



Helpline number: 0303 123 1113

ICO website: <https://www.ico.org.uk>

### **Transferring your information outside of Europe**

As part of the services offered to you through the Site, the information which you provide to us may be transferred to countries outside the European Union ("EU"). By way of example, this may happen if any of our servers are from time to time located in a country outside of the EU. These countries may not have similar data protection laws to the UK. By submitting your personal data, you are agreeing to this transfer, storing, or processing. If we transfer your information outside of the EU in this way, we will take steps with the aim of ensuring that your privacy rights continue to be protected as outlined in this privacy policy.

If you use our services while you are outside the EU, your information may be transferred outside the EU to provide you with those services.

Date this policy came into effect, approved by the SLT	September 2023 [ Amended November 2023] Signature: 
Next Review as agreed by the SLT	September 2024
Name or position of person responsible for this policy	Name: Rosaleen Liard  Signature:   Position: Director HR & Governance
Other related policies	Data Protection Pack Consent

AGE UK CROYDON is a registered charity no. 1081013 and a registered company no. 3921436. AGE UK CROYDON TRADING LIMITED, registered company no. 5792724 is a wholly owned subsidiary of AGE UK CROYDON. All Policies and Procedures apply to both companies.

AGE UK CROYDON is an equal opportunities employer and any discrimination or harassment on the grounds of colour, sex, race, nationality, religion or belief, ethnic origin, sexual orientation, gender reassignment, disability, marital status, domestic circumstances, pregnancy and maternity, trade union membership/non-membership or age will not be tolerated.