Policy number: AUKE-PO-G04
Approved by: HR Committee/Board Last review date: March 2024
Next review: March 2025

## Privacy Notice for Age UK Ealing

This notice is intended for Trustees, Clients/Members, Volunteers, Supporters, Employees, Workers, and Contractors.

## What is the purpose of this document?

Age UK Ealing is committed to protecting the privacy and security of your personal information.
We are a data controller. This means we are responsible for deciding how we hold and use personal information about you.

Our contact details are as follows:
Address: Age UK Ealing, Greenford Community Centre, 170 Oldfield Lane South, Greenford. UB6 9JS

Telephone: 02085678017
E-mail: reception@ageukealing.org.uk
Person responsible for data protection: Reginald Parkinson, CEO
This privacy notice describes how we collect and use personal information about you during and after your relationship with us, in accordance with the UK General Data Protection Regulation (UK GDPR).

We encourage you to read this notice carefully, together with any other privacy notice we may provide on specific occasions when we are collecting or processing personal information about you, so that you are aware of how and why we are using such information. It applies to all Trustees, employees, workers and contractors, volunteers, supporters and clients/members.

Any queries in relation to how we use your personal information should be directed to Reginald Parkinson, CEO, at the email address or telephone number shown above.

## What is personal data?

Personal data is any information relating to an identified or identifiable living person. When collecting and using personal data, we are transparent about why and how we process personal data. We process personal data for a number or purposes, and the means of collection, lawful basis of processing, use, disclosure, and retention periods for each purpose are set out in the relevant sections below.

Any personal data that is provided to us is provided either directly from the individual concerned or from a third party acting on behalf of an individual. Where we receive personal data that relates to an individual from a third party, the third party should be aware that the individual may be informed of the necessary information regarding the use of their data. Where necessary, reference may be made to this privacy notice.

## Types of personal data we process

We collect and process the following types of personal data:

- Names
- Addresses
- Email addresses and other contact information
- Date of birth, National Insurance Number, copy of passport or other ID documents
- Next of kin and other emergency contact details
- Any other information which we require to provide support such as health information
- Records of your correspondence with us
- Details of your visit to the website
- Information about your experiences with our work
- Personal information you provide when you apply to work for us such as work and education history
- Any criminal conviction history provided to us for the Disclosure and Barring Service (DBS) checks; and
- Any other information provided to us.


## How we collect personal data

We collect personal information about our Trustees, employees, workers and contractors, volunteers and clients through the application and recruitment, registration and telephone enquiry process, either directly from candidates or sometimes from a third party organisation, employment agency or background check provider.

We may collect additional personal information in the course of job-related activities throughout the period of you working/volunteering/accessing services with us.

## Why do we process personal data and the lawful basis

We will only use your personal information when the law allows us to. We may process your personal information to -

- provide advice and ongoing support
- undertake recruitment exercises
- manage our ongoing relationship with you as our employee
- manage our ongoing relationship with you as a trustee/contractor/volunteer
- manage an ongoing relationship such as attendance at events

Under the UK GDPR the lawful bases we rely on to process personal data are:

- Your consent if you are a client accessing our services
- We have a contract with you such as an employment contract
- It is necessary to comply with a legal obligation
- It is necessary to protect your vital interests; or
- Legitimate interests but we will ensure that our legitimate interests do not override your interests


## Do we need your consent to use particularly sensitive information?

In limited circumstances, we may approach you for your written consent to allow us to process certain particularly sensitive data. If we do so, we will provide you with full details of the information that we would like and the reason we need it, so that you can carefully consider whether you wish to consent.

In any circumstances where you may have provided your consent to the collection, processing and transfer of your personal information for a specific purpose, you have the right to withdraw your consent for that specific processing at any time.

To withdraw your consent, please contact our CEO at Age UK Ealing, Greenford Community Centre, 170 Oldfield Lane South, Greenford. UB6 9JS

## Sharing personal data?

We will only share personal data with others when we are legally permitted to do so. When we share data with others, we put arrangements and security mechanisms (a contract or a data sharing agreement) in place to protect the data and to comply with our data protection, confidentiality and security standards.

Occasionally, we may receive requests from third parties with authority to obtain disclosure of personal data, such as to check that we are complying with applicable law and regulations, to investigate an alleged crime, or to establish, exercise or defend legal rights. We will only fulfil requests for personal data where we are permitted to do so in accordance with the applicable data protection legislation.

## Data security

We have appropriate security measures in place to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal information to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal information on our instructions and they are subject to a duty of confidentiality.

We have processes in place to deal with any personal data breaches and will notify you and the UK Regulator, the ICO of a personal data breach where we are legally required to do so.

## How long do we keep personal data for?

We will only retain your personal information for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements. Our retention periods are set out in our Retention and Deletion Schedule.

In some circumstances we may anonymise your personal information so that it can no longer be associated with you, in which case we may use such information without further notice to you.

## Processors

We may contract with data processors to provide services to us such as vetting/background checks for volunteers. Any personal data shared with a processor for this purpose will be governed by appropriate safeguards and contracts under data protection law.

## Locations of processing

The personal data that we collect from you will be processed within the UK. It may be necessary, in some cases, to transfer personal data to the European Economic Area (EEA) and any such transfers will be fully compliant with the requirements of the legislation. If personal data is to be transferred outside the UK or EEA to a country which is not designated as 'adequate' then, if we are not relying on consent, we will ensure that appropriate safeguards are in place such as an International Data Transfer Agreement or EU Standard Contractual Clauses with the UK Addendum to ensure that we comply with the UK GDPR. We will take all reasonable steps to ensure that your personal data is treated securely, in accordance with this privacy notice.

## Your data protection rights

Individuals have certain rights over their personal data. Please note that your rights may be limited and subject to exemptions in certain situations:

- Right to request access to your personal data (commonly known as a "data subject access request"). This enables you to request a copy of any personal data we may be processing about you.
- Right to request correction of the personal data we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.
- Right to request erasure of your personal data. You can ask us to delete or remove personal data where there is no legal basis for us continuing to process it.
- Right to object to processing of your personal data where we are relying on legitimate interests (or those of a third party) You also have the right to object if we are processing your personal data for direct marketing purposes.
- Right to request the restriction of processing of your personal data. This enables you to ask us to suspend the processing of personal data about you, for example if you want us to establish its accuracy.
- Right to portability. You can ask us to transfer your personal information to another party in certain circumstances.

If you want to exercise any of your rights please contact our CEO at Age UK Ealing, Greenford Community Centre, 170 Oldfield Lane South, Greenford. UB6 9JS

You will generally not have to pay a fee to access your personal information (or to exercise any of the other rights) - however, we may charge a reasonable fee if your request is unfounded or excessive. Alternatively, we may refuse to comply with the request in some circumstances.

We may need to request specific information from you to help us confirm your identity and ensure your right to access the information (or to exercise any of your other rights). This is another appropriate security measure to ensure that personal information is not disclosed to any person who has no right to receive it.

## Informing us of changes

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal circumstances change during your relationship with us.

## Complaints to the Information Commissioner's Office (ICO)

We hope that you won't ever need to, but if you do want to complain about our use of personal data, please send an email with the details of your complaint to: CEO at Age UK Ealing, Greenford Community Centre, 170 Oldfield Lane South, Greenford. UB6 9JS

We will investigate and respond to any complaints we receive.

You also have the right to lodge a complaint with the UK data protection regulator, the Information Commissioner's Office ("ICO"). For further information on your rights and how to complain to the ICO, please refer to the ICO website ICO Make a Complaint Alternatively, you can contact the ICO on 03031231113.

## Changes to this privacy notice

We reserve the right to update this privacy notice at any time, and we will provide you with a new privacy notice when we make any substantial updates.

We may also notify you in other ways from time to time about the processing of your personal data.
If you have any questions about this privacy notice, please contact our CEO

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