

Privacy policy

Version 1	September 2018
Agreed by SMT	
Review date	September 2020

1. Scope

Age UK East London (“we”, “us”, or “our”) is committed to protecting and respecting the personal data that we hold. This privacy statement describes why and how we collect and use personal data and provides information about individuals’ rights. It applies to personal data provided to us, both by individuals themselves or by others. We may use personal data provided to us for the purposes described in this privacy statement or as made clear before collecting personal data.

Personal data is any information relating to an identified or identifiable living person. When collecting and using personal data, our policy is to be transparent about why and how we process personal data.

We process personal data for numerous 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.

The personal data that is provided to us is provided either directly from the individual concerned, from a third party acting on behalf of an individual.

Where we receive personal data that relates to an individual from a third party, we request that this third party inform the individual of the necessary information regarding the use of their data. Where necessary, reference may be made to this privacy statement.

2. Security

We take the security of all the data we hold seriously. Staff are trained on data protection, confidentiality and security.

We have a framework of policies and procedures which ensure we regularly review the appropriateness of the measures we have in place to keep the data we hold secure.

All information you provide to us is stored on our secure servers.

Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to our site; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

3. Data that we hold

3.1 Services

We provide services to individuals as well as organisations. The exact data held will depend on the services to be provided.

Where we engage with individuals, we may collect and process personal data in order to satisfy a contractual or operational obligation. We request that

individuals only provide the personal data that is required for us to fulfil our contractual or operational obligation.

3.1.1 Why do we process data?

- Services Provided - Data is processed when you have enquired into the services we provide or when we are currently providing services to you. These services include:
 - Community Outreach – we will process your data if you have signed up to assist Age UK East London on a project we are working on in a borough.
 - Information Advice and Advocacy – We will process your data if you have contacted us for advice, if you have been referred to us by another individual or third party organisation, if you attended our membership group. We will only process this data to provide you with advice or arrange a meeting with you.
 - Events – we will process your data if you have expressed a wish to attend or you have actually attended one of our events.
 - Home Care – we will process the data to provide you to help give you support at home, this also includes support with your medical care.
 - Volunteers – we will process your data if you have expressed a wish to become a volunteer or you actually are a volunteer. We do this so that you can help we the services we provide to elderly individuals, assist in events and help generate awareness about Age UK East London.
- Individual needs. When communicating with and assessing the needs of individuals, personal data may be processed in order to ensure that their needs are appropriately satisfied. This may include assessing whether the services provided to our individuals are appropriate.
- Administration. In order to manage and administer our business and services, we may collect and process personal data. This may include (but is not limited to) maintaining internal business records, managing client relationships, hosting events, and maintaining internal operating processes.
- Regulatory. In order for Age UK East London to do what it does, we may from time to time be required to collect and process personal data in order to fulfil regulatory or legal requirements. This may include (but is not limited to) the verification of identity of individuals.

3.1.2 What data is processed?

The data that is processed is dependent on the service that is being provided and on the recipient of this service.

- Name, address, DOB, medical records, next of kin, referrals, social worker details, power of attorney, photos, case studies, national insurance number, NHS Number.

3.1.3 How long do we hold data for?

We retain the personal data processed by us for as long as is considered necessary for the purpose(s) for which it was collected, there may also be occasions which will require data to be kept for longer, however this will typically be for legal purposes.

3.2 Suppliers

We collect and process personal data about our suppliers, subcontractors, and individuals associated with them. The data is held to manage our relationship, to contract and receive services from them, and in some cases to provide professional services to our clients.

3.2.1 Why do we process data?

- Receiving goods and services. We process personal data in relation to our suppliers and their staff as necessary to receive the services.
- Providing services to our clients. Where a supplier is helping us to deliver professional services to our clients, we process personal data about the individuals involved in providing the services in order to administer and manage our relationship with the supplier and the relevant individuals and to provide such services to our clients.
- Administering, managing and developing our businesses and services. We process personal data in order to run our business, including:
 - keeping adequate client records to ensure a good quality service (personal details in general for contact and record keeping purposes such as name and address, but also more in depth records as appropriate to the service. For example in Information and Advice if helping with a benefit application process we could hold data including bank statements, pension details etc; in Advocacy we may keep copies of tenancy agreements or council tax bills.
 - managing our relationship with suppliers;
 - developing our businesses and services (such as identifying client needs and improvements in service delivery);
 - maintaining and using IT systems;
 - hosting or facilitating the hosting of events; and
- Security, quality and risk management activities. We have security measures in place to protect our and our clients' information (including personal data), which involve detecting, investigating and resolving security threats. Personal data may be processed as part of the security monitoring that we undertake; for example, automated scans to identify harmful emails. We

have policies and procedures in place to monitor the quality of our services and manage risks in relation to our suppliers. We collect and hold personal data as part of our supplier contracting procedures. We monitor the services provided for quality purposes, which may involve processing personal data.

- Complying with any requirement of law, regulation or a professional body of which we are a member. We are subject to legal, regulatory and professional obligations. We need to keep certain records to show we comply with those obligations and those records may contain personal data.

3.2.2 What data do we hold?

We will hold supplier's names, contacts names, and contact details of suppliers.

3.2.3 How long do we hold data for?

We retain the personal data processed by us for as long as is considered necessary for the purpose for which it was collected (including as required by applicable law or regulation). Data may be held for longer periods where required by law or regulation and in order to establish, exercise or defend our legal rights.

4. People who use our website

When people visit our website, personal data is collected both through automated tracking and interacting with various forms on the website or apps (collectively referred to as the websites).

Personal data may be collected when individuals fill in forms on our websites or by corresponding with us by phone, e-mail or otherwise. This includes information provided when an individual registers to use our websites, subscribe to our service, make an enquiry.

For more information, please visit our [Cookie's Policy](#).

5. Sharing personal data

We will only share personal data when we are legally permitted to do so. When we share data with others, we will do so with your explicit consent. We put contractual arrangements and security mechanisms in place to protect the data and to comply with our data protection, confidentiality and security standards.

Personal data held by us may be transferred to:

- Third party organisations that provide applications/functionality, data processing or IT services to us
- Social Services as they may also help with providing support to you
- Funders may require us to share data with them.

- Carers may also receive your data but this will be to help provide you with support or a service that you have consented to.

6. Locations of processing

The data that we collect from you may be transferred to, and stored at a destination inside the European Economic Area (“EEA”). By submitting your personal data, you agree to this transfer, storing or processing. We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this Privacy Policy.

7. Individual’s rights

Individuals have certain rights over their personal data and data controllers are responsible for fulfilling these rights as follows:

- Individuals may request access to their personal data held by us as a data controller.
- Individuals may request us to rectify personal data submitted to us or, where appropriate, contact us via the relevant website registration page or by amending the personal details held on relevant applications with which they registered.
- Individuals may request that we erase their personal data
- Where we process personal data based on consent, individuals may withdraw their consent at any time by contacting us or clicking on the unsubscribe link in an email received from us.
- Individuals may have other rights to restrict or object to our processing of personal data and the right to data portability.
- Individuals may request information about, or human intervention into, any automated data processing that we may undertake.

If you wish to exercise any of these rights, please send an email to dataprotection@ageukeastlondon.org.uk.

8. Complaints

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 dataprotection@ageukeastlondon.org.uk. We will look into 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 <https://ico.org.uk/concerns>

9. Data controller and contact information

The data controller for Age UK East London is Age UK East London. If you have any questions about this privacy statement or how and why we process personal data, please contact us at:

Address: Age UK East London, 82 Russia Lane, London, E2 9LU

Email: dataprotection@ageukeastlondon.org.uk

Telephone: 020 89817124