

Data Protection Policy

Context and overview

Key details

Approver:	Aaron Cue (SIRO)
Author:	Kellie Rickell (DPO)
Approved by SIRO on:	26th June 2026
Next review date:	26th June 2027

Change Log

Effective Date	Version	Summary of Changes
June 2026	v3	2. Responsibilities Job roles updated 4. Policy Content Phone number updated to 0207 346 6800 5.3 Sexual orientation added
June 2026	v3	Overhauled policy to align with the Data (Use and Access) Act 2025. Updated statutory complaint procedures, implemented the charity soft opt-in framework (non-retrospective), and formalised public interest data-sharing terms for public health/social care research.
June 2026	v3	We may use artificial intelligence (AI) systems to help us (e.g., organise our data, transcribe calls, analyse donor trends). Staff may utilise administrative AI to summarise meetings, write case notes, or generate emails or letters. This

		data is anonymised and handled securely. No personal data is inputted into generative AI tools (e.g. Gemini). All AI-assisted processes are subject to human review. We do not use fully automated systems to make final decisions about the support or care you receive, or profiling. No personal or sensitive data is used to train public AI models. Any data processed through AI is strictly protected under our secure IT framework.
June 2023	v3	Clarification on Stripe payments for memberships, event bookings and service bookings.

1. Purpose

This Data Protection Policy sets out how Age UK Lambeth collects, uses, and protects any personal data that you provide to us when you use our website or interact with us in any other way. Any information Age UK Lambeth holds, regardless of its format, and how it was acquired, must be protected against unauthorised access/use, disclosure, modification, recording or destruction.

We are committed to ensuring that your privacy is protected and we will only process your personal data in accordance with the General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018. The policy has been approved by the Senior Information Risk Officer (SIRO).

2. Responsibilities

A culture of information security is encouraged and promoted within the organisation, placing information security as a critical feature of what we do and ensuring that everyone understands their individual and collective responsibilities in this area. Key individuals are identified as having specific responsibilities within the organisation.

Area of Responsibility	Responsible
The board is responsible for governance. They approve and monitor the Information Governance Policy and through the Chief Executive monitor the organisation's adherence with this	The Board of Trustees
The Senior Information Risk Owner (SIRO) is responsible for overseeing information risk across Age UK Lambeth,	Senior Information Risk Officer (SIRO)

ensuring that data protection and cybersecurity risks are identified, assessed, and mitigated. The SIRO reports to the Board of Trustees and supports compliance with the Information Governance Policy through strategic oversight and collaboration with key staff. They work closely with the DPO to maintain effective security controls and organisational accountability.	
Information security (implementing the procedures) and Data protection	Head of Enterprise Architecture and Compliance
Procedural audit - effectiveness and compliance	Head of Enterprise Architecture and Compliance
Service level compliance	Heads of departments
Employee and volunteer data and information	Information Asset Manager
Non HR data and information	Heads of departments

3. Definitions

To ensure clarity and common understanding, the following definitions are provided:

Personal Data: Information about an identified or identifiable person.

Data Processing: Any operation performed on personal data.

Data Controller: Entity responsible for personal data processing.

Data Processor: Entity processing personal data on behalf of the data controller.

Data Subject: Individual whose personal data is being processed.

Consent: Voluntary agreement to process personal data.

Legitimate Interests: Legal basis for processing personal data.

Privacy by Design: Integrating privacy into project development.

Data Protection Officer (DPO): Individual overseeing data protection activities.

UK GDPR: The United Kingdom's adoption of the General Data Protection Regulation (GDPR) governing data protection and privacy rights.

Data (Use and Access) Act (DUAA): The 2025 UK legislation that updates and modifies the UK GDPR framework.

Data Protection Impact Assessment (DPIA): Assessment of high-risk data processing activities.

Data Breach: Unauthorised access or loss of personal data.

Special Category Data: Sensitive personal data, including racial origin, political opinions, religious beliefs, health data, and more. Requires additional protection.

These definitions assist in establishing a shared understanding of key terms and concepts used throughout the policy.

4. Policy Content

This policy explains:

- What personal data we collect and why we collect it
- How we use your personal data
- Your rights in relation to your personal data
- How we protect your personal data
- How long we keep your personal data
- Training and monitoring data protection policy and practice
- How to contact us

data@ageuklambeth.org

0207 346 6800

10 Acre Lane, London SW2 5SG

Registered charity number 1063497

Company number 3252067.

5. What personal data do we collect and why do we collect it?

5.1 We collect the minimum amount of data necessary for the purpose. Personal data might be collected when you:

- Make a donation to us
- Sign up to receive our newsletters or other communications
- Participate in one of our events or campaigns
- Contact us with a question or request
- Are referred to one of our services or have referred yourself
- Register for an organisation membership and manage membership fees
- Book a service, class, or event through our online booking system
- Call recordings and AI transcripts

5.2 The personal data we collect may include your name, email address, postal address, phone number, and payment details. We collect this data in order to:

- Process your donation or other transactions
- Keep you informed about our work and how you can support us
- Invite you to events and campaigns
- Respond to your queries and requests
- Register to become a volunteer
- Send you updates on fundraising efforts and opportunities to contribute
- Share information about new projects, programs, and initiatives

- Offer ways to engage with our organisation through marketing communications and newsletters
- To administer and manage your membership status and benefits.
- To process bookings, confirm reservations, and communicate vital updates regarding scheduled events or services.

Payment Processing Notice: All financial transactions for memberships and our booking system are processed securely by our third-party payment provider, **Stripe**. Age UK Lambeth does not store or directly handle your full credit or debit card details. Stripe processes this transaction data as an independent data controller/processor in accordance with their own privacy guidelines, utilising encrypted tokens to secure your payment information.

- **Third-Party AI Processors:** The use of external AI tools to transcribe phone calls. You will be informed before speaking with the call handler if the call is being recorded.

In accordance with the Data (Use and Access) Act 2025, we may utilise a 'soft opt-in' to keep you informed about our fundraising efforts and marketing if you accessed one of Age UK Lambeth's services, giving an easy opportunity to opt out. Crucially, this soft opt-in framework does not apply retrospectively to existing clients who have already explicitly consented or opted out of these communications. Marketing or fundraising opportunities will only be sent to a client via email, post or text.

5.3 We may ask to collect optional sensitive special category data including:

- Ethnicity
- Religion
- Medical history (including, vaccination status, and/or GP information)
- Date of birth
- Gender
- Sexual orientation
- Financial disclosure (e.g. welfare information).
- Photo proof of identity (e.g. passport, driving licence.)

We may be in touch to request feedback from you about the service and support you received, but only if you have given informed consent to be contacted. You can choose to remain anonymous.

6. How do we use your personal data?

We use your personal data for the purposes for which it was collected, including to:

- Process your donation or other transactions
- Keep you informed about our work and how you can support us
- Invite you to events and campaigns
- Respond to your queries and requests
- Communicate with you about your voluntary role
- Keep you updated a referral made by you or for you to access a service
- Share your information with third party organisations (with your informed consent)
- Share data with trusted third parties where there is a clear legal basis for research purposes of public interest. Where data is shared under this basis, beneficiaries will be proactively notified via our website and provided with a clear, accessible option to opt out of such sharing.
- To fulfill our contractual obligations to you when you purchase a membership or secure a booking. We share transactional information with payment gateways (specifically Stripe) strictly for the purpose of completing payment authorisation and fraud prevention.
- We do not carry out any automated decision-making or profiling
- Staff may use administrative AI tools (like Gemini) to summarise meetings, write case notes, or generate emails or letters. Data is anonymised and handled securely. Personal data is not inputted into any generative AI tools (e.g. gemini or ChatGPT). All AI-assisted processes are subject to human review.
- Staff may partner with external researchers or use tools to look at trends in Lambeth (e.g., your data impact/climate resilience projects) or the analysis reports. Personal data is anonymised before AI model analysis.

For more information on how your information is used, [visit our website](#) ([click this link](#)).

We may also use your personal data for statistical analysis and to help us improve our website and the services we offer.

We will not share your personal data with any third parties for marketing purposes without your consent.

7. Your rights in relation to your personal data

You have the right to:

- Request a copy of the personal data we hold about you
- Request that we correct any personal data that is incorrect or out of date
- Request that we delete your personal data
- Object to the processing of your personal data
- Request that we restrict the processing of your personal data

- Request that we transfer your personal data to another organisation

You can exercise these rights by contacting us using the details provided in the [privacy policy](#) ([click this link for the privacy policy](#)) on our website.

8. Principles for Data Processing

Age UK Lambeth adheres to the six principles for data processing outlined in the UK GDPR:

8.1 Lawfulness, Fairness, and Transparency

Personal and special category data is processed lawfully, fairly, and transparently. Age UK Lambeth ensures that a valid legal basis exists for processing personal data, and individuals are provided with clear and concise information about the processing in a transparent manner.

8.2 Purpose Limitation

Personal data and special category data is collected and processed for specified, explicit, and legitimate purposes. Age UK Lambeth defines the purposes for which personal data is collected and ensures that any further processing is compatible with those purposes.

8.3 Data Minimisation

Personal data is limited to what is necessary for the intended purposes. Age UK Lambeth collects and processes only the minimum amount of personal data required to achieve the specified purposes.

8.4 Accuracy

Personal data is accurate, kept up to date, and steps are taken to ensure its accuracy. Age UK Lambeth maintains procedures to ensure that personal data is accurate and updated or rectified if necessary.

8.5 Storage Limitation

Personal data is retained for no longer than necessary for the purposes for which it is processed, and reporting and monitoring procedures thereafter. Age UK Lambeth establishes data retention policies that specify the periods for which personal data is kept, considering legal requirements and the purposes for data collection. If you would like more details about our data retention policy, please contact us at data@ageuklambeth.org.

8.6 Integrity and Confidentiality

Personal data is processed in a manner that ensures its security, integrity, and confidentiality. Age UK Lambeth implements appropriate technical and organisational measures to protect personal data against unauthorised or unlawful processing, accidental loss, destruction, or damage.

9. Process for Identifying and Minimising Data Protection Risks

Age UK Lambeth has established a systematic process to identify and minimise data protection risks before commencing new projects or processes involving personal data. The process includes the following steps:

9.1 Project and Service Initiation and Planning

The project team identifies the objectives, scope, and potential data protection implications of the project.

9.2 Privacy and Data Protection Assessment

A comprehensive privacy and data protection assessment is conducted, examining data flows, collection methods, storage, and sharing practices. The legal basis for processing personal data is evaluated, and potential risks to individuals' privacy and data protection rights are assessed.

9.3 Data Protection Impact Assessment (DPIA)

For projects or plans involving the processing of personal data with high risks to individuals' privacy and data protection, Age UK Lambeth conducts a Data Protection Impact Assessment (DPIA). This assessment follows the steps outlined in the UK GDPR and includes:

- Data Processing Description
- Assessment of Necessity and Proportionality
- Identification of Risks and Impact
- Evaluation of Privacy Safeguards and Measures
- Risk Mitigation and Recommendations
- Consultation and Decision-Making
- Review and Update

The DPIA ensures a thorough evaluation of risks and proposes measures to minimise those risks, promoting responsible and compliant data handling practices.

9.4 Risk Mitigation Strategies

Based on assessment findings, Age UK Lambeth develops and implements risk mitigation strategies. Measures include implementing technical and organisational controls, updating policies and procedures, and seeking individuals' consent where necessary.

9.5 Consultation and Decision-Making

Throughout the process, relevant stakeholders, including the DPO, Senior Management team, project team members, and individuals whose data is being processed, are consulted to ensure a comprehensive assessment of risks and informed decision-making.

9.6 Documentation and Compliance

The assessment, findings, and risk mitigation measures are documented, providing evidence of compliance with data protection requirements. The documentation is reviewed periodically to reflect changes in projects, processes, and data protection laws.

9.7 Data processed outside the EEA

We use some third party programs that transfer data outside of the EEA. We have Transfer Risk Assessments for these systems and have conducted Data Protection Impact Assessments to ensure your data is secured.

9.8 Data processing and AI

No personal or sensitive data is used to train public AI models. Any data processed through AI is strictly protected under our secure IT framework.

10. Data Breach Management

Age UK Lambeth maintains procedures for detecting, reporting, and managing data breaches. In the event of a data breach, the organisation follows a predefined incident response plan to mitigate the impact, notify relevant parties, and take necessary actions to prevent similar incidents in the future.

11. Training and Awareness

Age UK Lambeth provides regular training and awareness programs to staff members and stakeholders, ensuring they understand their responsibilities regarding data protection and privacy. Training covers relevant policies, procedures, and best practices, fostering a culture of data protection compliance.

12. Monitoring and Review

The implementation and effectiveness of this policy will be monitored by the Chief Executive and the DPO (Data Protection Officer) annually. The Chief Executive and the Board of Trustees will also review the policy annually and recommend and implement action to ensure the policy is up to date and compliant with current legislation and guidance.

How to contact us

If you have any questions about this Data Protection Policy or if you would like to exercise your rights in relation to your personal data, please contact us by email at data@ageuklambeth.org or by calling our Helpline on 0207 346 6800.

If you would like this policy to be provided in an accessible format (e.g. larger font or a language translation) please get in touch data@ageuklambeth.org.

Under the Data (Use and Access) Act 2025, if you have a concern regarding any data handling matter (including subject access requests, processing objections, or potential data breaches), **you must submit a formal complaint to Age UK Lambeth first** to allow us the opportunity to investigate and resolve it. Complaints can be completed on our website [by following this link](#). Age UK Lambeth will acknowledge your complaint within 30 days and provide a full resolution without undue delay. If you remain unsatisfied after our internal investigation concludes, you then reserve the right to escalate your complaint to the Information Commissioner's Office (ICO).