

**Privacy Policy**

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| **Version 2.3** | **Version Date:**  | 08.12.2020 | **Created by** **Updated by:** | Hilary Brockway:Claire Ruston |
| **Approved Date:** | **08.12.2020** | **Approved by:** | SMT |
| **Original version sent to staff via email on: 09.12.2020****Sent by: Claire Ruston** |  | **Renewal Due:** | June 2024 |
| **Amendments made 25.05.21:*** Section numbers added for referencing
* Office manager title updated to Info Services Manager
* Clarification about SARs and Rights form
* SARS response updated to 40 days to match DP procedure
* Contact emails updated
 | Updates done by Claire Ruston Updates approved by Iain Anderson |
| **Review completed** 08.06.22. No changes required. Approved by IA (Chief Executive) |
| **Review completed** 01.03.23 – revisions made to Section 6 clarifying when information may be shared with Age UK (national) and other 3rd parties - under the lawful basis of legitimate interest. | Update by Iain Anderson |
| **Amendment made 08.06.23** V2.3 to Cookies section in line with guidance from national AUK partner marketing team  | Update by Claire Ruston |

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| 1. **Who are we**
 | Age UK Leeds is committed to protecting and respecting your privacy and security. Whenever you provide us with your personal information we will treat that information in accordance with this policy, our terms and conditions and current UK Data Protection legislation.By using any services we offer, including our website, you are agreeing to be bound by this policy.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. An updated version is available on our website <https://www.ageuk.org.uk/leeds/privacy-policy/> or you can request a copy.Age UK Leeds is a registered charity (number 504899 and company limited by guarantee (number 1236909). The registered address is Bradbury Building, Mark Lane, Leeds, LS2 8JA. |
| 1. **How do we collect information from you?**
 | **Information you give to us**We may collect and store information about you when you interact with us. For example, this could be when you:* support our work through a donation;
* access a service;
* attend an event;
* book our meeting rooms or catering;
* submit an enquiry;
* give us feedback;
* make a complaint;
* apply for a job;
* register as a volunteer;
* enter into a contract with us;
* are captured on CCTV recording
* Audio or Video recording

**Information we get from your use of the website**When you visit our website we collect various personal information which may include your name, address, contact details, IP address, and information regarding which pages are accessed and when.**When you indirectly give us information**When you interact with us on social media platforms such as Facebook, WhatsApp, Twitter or LinkedIn we may also obtain some personal information about you. The information we receive will depend on the privacy preferences you have set on each platform and the privacy policies of each platform. To change your settings on these platforms, please refer to their privacy notices. |
| 1. **What type of information is collected from you?**
 | When you engage with us by phone, mail, in person or online, we may collect information about you (referred to in this Privacy Policy as 'personal information'). This may include your name, address, email address, telephone number, date of birth, job title and details of your education and career, why you are interested in Age UK Leeds, and other information relating to you personally which you may choose to provide to us.Data protection law recognises that certain types of personal information are more sensitive. This is known as 'sensitive' or 'special category' personal information and covers information revealing racial or ethnic origin, religious or philosophical beliefs and political opinions, trade union membership, genetic or biometric data, information concerning health or data concerning a person's sex life or sexual orientation.Sensitive information will only be collected where necessary, for example, we may need to collect health information from you to deliver a service as a client, volunteer or member of staff. Clear notices will be provided at the time we collect this information, stating what information is needed, and why.With your explicit consent, we may also collect sensitive personal information if you choose to tell us about your experiences relating to our services for use in a case study.If you make a donation online your card information is not held by us, it is collected by our third party payment processors, who specialise in the secure online capture and processing of credit/debit card transactions.  |
| 1. **How is your information used?**
 | We may use your information to:* process a donation that you have made;
* provide a service e.g. home visit, request for advice;
* seek your views or comments on the services we provide;
* notify you of changes to our services;
* send you communications which you have requested and may be of interest to you;
* process a job or volunteer application;
* carry out our obligations arising from any contracts entered into between you and us;
* ensure personal safety where we reasonably think that there is a risk of serious harm or abuse to you or someone else;
* prevent crime and keep our people and the public safe by recording your image on CCTV.
* Audio or video recording maybe used to provide a contemporaneous and accurate record that can be shared with participants
 |
| 1. **How long is your information kept for?**
 | We keep your information for no longer than is necessary for the purposes it was collected for. Client data is held for 7 years.We review our retention periods on a regular basis.If you wish to know more about how long we hold your personal data for please contact Iain Anderson, Chief Executive Officer, Age UK Leeds, Bradbury Building, Mark Lane, Leeds, LS2 8JA |
| 1. **Who has access to your information?**
 | We will not sell or rent your information to third parties.We will not share your information with third parties for marketing purposes.It may be necessary to pass your information to a third party in order to process a service (e.g. when you make a donation), but we will only share the personal information necessary to deliver the service.We will comply with requests where disclosure is required by law, for example, we may disclose your personal information to the government for tax investigation purposes, or to law enforcement agencies for the prevention and detection of crime. We may also share your information with the emergency services or the local authority safeguarding team if we reasonably think there is a risk of serious harm or abuse to you or someone else.In some cases, for example when providing reports to Age UK the national charity or external funders, some basic demographic and service information may be shared. This is done so that they can help monitor our work and contribute to improving the services that we provide.Information will be shared in a way that individuals cannot be identified from it unless you have given explicit consent so for a specific purpose, such as sharing your story.If you have given consent to external audit we may share details in order for an external organisation to view your files to check the quality of the work we do. This includes: * Age UK (the national organisation) who audit our advice work

When we do share this information, we do so under the lawful basis of legitimate interest (see section 8). |
| 1. **Transfer of your information to third parties**
 | We may transfer your personal information to a third party **as part of a sale of some or all of our business and assets** to any third party or as part of any business restructuring or reorganisation, or if we’re under a duty to disclose or share your personal data in order to comply with any legal obligation or to enforce or apply our terms of use or to protect the rights, property or safety of our staff, supporters, customers, users of the website or others. However, we will take steps with the aim of ensuring that your privacy rights continue to be protected. |
| 1. **Lawful Processing**
 | Data protection law requires us to rely on one or more lawful grounds to process your personal information. The following are the grounds we use: **Specific consent:** where you have given us consent to use your personal information in a certain way, such as to send you an email, or make a referral to another organisation.**Performance of a contract:** where it is necessary as part of a contract to which you are a party.**Legal obligation:** so that we can comply with a legal or regulatory obligation, for example where we are ordered by a court or regulatory authority like the Charity Commission or Fundraising Regulator.**Vital interests:** where it is necessary to protect life or health (for example in the case of medical emergency suffered by an individual at one of our groups), or a safeguarding issue. **Legitimate interests:** where it is reasonably necessary to achieve our or others’ legitimate interests (as long as what the information is used for is fair and does not duly impact your rights).We consider our legitimate interests to be running Age UK Leeds as a charitable organisation in pursuit of our aims and ideals. For example to:* send postal communications which we think will be of interest to you;
* monitor who we deal with to protect the charity against fraud, money laundering and other risks;
* enhance, modify, personalise or otherwise improve our services / communications for the benefit of our clients.

When we legitimately process your personal information in this way, we consider and balance any potential impact on you (both positive and negative), and your rights under data protection laws. We will not use your personal information where our interests are overridden by the impact on you, for example, where use would be excessively intrusive (unless, for instance, we are otherwise required or permitted to by law).We also have a legitimate business interest to ask for data such as diversity monitoring information and your thoughts and opinions about our services which we use to improve how we do things. When we use sensitive personal information, we require an additional legal basis to do so under data protection laws, so will either do so on the basis of your explicit consent or another route available to us at law (for example, if we need to process it for employment, social security or social protection purposes, your vital interests, or, in some cases, if it is in the public interest for us to do so). |
| 1. **Fundraising and Marketing**
 | We will not send requests for fundraising but may send information about events and activities that we are running if you have given us consent to do this. We will only do this via the channels you have asked us to.  |
| 1. **Your choices**
 | You have the right to opt out of receiving communications from us at any time.You can also change the way we contact you at any time.You can do this by calling our Information Services Team Manager on 0113 389 3000 or emailing info@ageukleeds.org.ukIn order to opt you out of receiving communications, it is necessary to retain some of your details to ensure we don’t contact you again in future. Your details will only be used for this purpose. |
| 1. **Your Rights**
 | The GDPR provides the following rights for individuals, which our organisation provides to you:1. **The right to be informed**

We communicate what we do with your information through this policy and our consent forms. Our staff and volunteers will also inform you verbally what information we are holding and why. 1. **The right of access**

You have the right to request to see what information we hold about you, free of charge and within 40 days from the receipt of a written request and copies of identification documents. **If you would like to do this, please complete a copy of our Subject Access Request Form and send it along with copies of two separate identification documents which provide photo identification and confirm your address, such as a passport, driving license, or utility bill.**Please also provide any additional information that is relevant to the nature of your contact with us, as this will help us to locate your records.**Details of how to obtain a copy of the Subject Access Request Form and where to send it are shown at the bottom of this section.**1. **The right to rectification**

If you think that any personal information we hold about you is incorrect then please contact us.If you have a specific case worker or volunteer supporting you then you can inform them directly of any changes you would like to make. The change will be noted within the case notes held about you. If you are asking for significant changes to be made you may be required to submit the request in writing by completing a form or sending a letter or email.If you do not have a specific case worker or you are unsure who this is you can also contact our Information Services Team on 0113 389 3000 or email info@ageukleeds.org.uk. As these staff will not work with you directly you will be required to submit the request in writing by email or letter or a form can be provided on request.Details of how to send your letter, email or where to obtain the form are listed at the end of this section. We will correct any errors within one month of you notifying us. There are some circumstances where we can refuse a request.**If you wish to exercise any of the following rights you must provide the request in writing.** This can be done by a letter, email or by completing the Individual Rights Form. Details of how to send your letter, email or where to obtain the form are listed at the end of this section. We may require copy of identification as well. 1. **The right to erasure**

You have the right to ask us to erase all personal data we hold about you. Requests should be made in writing to a member of staff. This request will be passed to our Information Services Manager and we will respond within one month of the request. There are some circumstances where we can refuse a request. In many cases we will anonymise that information, rather than delete it. 1. **The right to restrict processing**

As an alternative to deleting your data you can talk to us about limiting the way(s) we can use your data. 1. **The right to data portability**

If we are processing your data under the lawful grounds of consent or contract, and doing this electronically, then you can ask us share with other services and providers. This does not include data held in paper files.1. **The right to object**

You have the right to object to processing your data where we are using your personal information (1) based on legitimate interests, (2) for direct marketing or (3) for statistical/research purposes. If you have previously given us consent you have the right to change your mind at any time. If we are processing your data under legitimate interests you have the right to ask us not to. Please note that exceptions apply to a number of these rights, and not all rights will be applicable in all circumstances. For more details we recommend you consult the guidance published by the UK’s Information Commissioner’s Office, <https://ico.org.uk/> **How to obtain a form to complete:**Electronic versions of the Subject Access Request form and the Individual Rights Request form are available to download on the privacy section of the Age UK Leeds website. If you need a paper copy of the form, or support to complete the form, then please contact our Information Services Team on 0113 389 3000 or email info@ageukleeds.org.uk **Where to send the documents:**You can send us the documents via post to:Age UK LeedsBradbury BuildingMark LaneLeedsLS2 8JAYou can also email any documents or written requests to info@ageukleeds.org.uk |
| 1. **Keeping your information up to date**
 | We take reasonable steps to ensure your information is accurate and up to date. We really appreciate it if you let us know when your contact details change.In order to verify a legacy, we may use publicly available sources to identify deceased records.  |
| 1. **Keeping your information safe**
 | When you give us personal information we will take steps to ensure that it’s treated securely.* We minimise the paper records that we hold;
* Any paper records which contain personal data are held securely and disposed of securely once they are no longer required;
* If we need to share personal data, e.g. to make a referral, we will only share the information we need to;
* Any electronic files containing personal data will be encrypted or password protected before they are shared;
* We limit access to information;
* Ensure our staff and volunteers have appropriate training.

We undertake regular reviews of who has access to information that we hold to ensure that your information is only accessible by appropriately trained staff, volunteers and contractors.If you use your credit or debit card to donate to us, buy something or make a booking online, we pass your card details securely to our payment processing partners. We do this in accordance with industry standards and do not store the details on our website.However, please be aware that there are always inherent risks in sending information by public networks or using public computers and we cannot 100% guarantee the security of data (including personal information) disclosed or transmitted over public networks. |
| 1. **Use of 'cookies'**
 | When you visit our website, we collect various personal information which may include your name, address, contact details, IP address, and information regarding which pages are accessed and when. New updated guidance from Age UK National states that there is now a requirement for website users to actively consent to the use of Cookies.As a result, in Spring/ Summer 2023 a Cookie Compliance Panel will be installed on the website. This is a small popup that allows website visitors to choose which Cookies they consent to.There will also be a Cookie Compliance Notice. This is a page on our website that provides more information on how we use Cookies. Users can access this page via the Cookie Compliance Panel, or by finding the link at the bottom of each page on our websites. |
| 1. **Links to other websites**
 | Our website may contain links to other websites run by other organisations. This policy applies only to our website‚ so we encourage you to read the privacy statements on the other websites you visit. We cannot be responsible for the privacy policies and practices of other websites even if you access them using links from our website.In addition, if you linked to our website 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 privacy policy of that third party site. |
| 1. **Aged 16 or under**
 | If you are aged 16 or under‚ please get your parent / guardian's permission beforehand whenever you provide us with personal information. |
| 1. **Transferring your information outside of Europe**
 | We will not transfer your information outside of Europe.  |
| 1. **Complaints**
 | If you would like more information, or have any questions about this policy, to make a formal complaint about our approach to data protection, or raise privacy concerns please contact our Information Services team who can also provide a copy of our complaints procedure.

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| Email | info@ageukleeds.org.uk |
| Phone  | 0113 389 3000  |
| Post | Age UK LeedsBradbury BuildingMark LaneLeeds LS2 8JA |

If you are not happy with the response you receive you can raise your concern with the relevant statutory body:Information Commissioner’s OfficeWycliffe HouseWater LaneWilmslowCheshireSK9 5AFAlternatively you can [visit their website](https://ico.org.uk/).We are registered with the Information Commissioner’s Office as a Data Controller under number Z8358997. |
| 1. **Changes to this policy**
 | Any changes we may make to this policy in the future will be posted on this website so please check this page occasionally to ensure that you’re happy with any changes. If we make any significant changes we’ll make this clear on this website. |
| 1. **Review of this Policy**
 | This policy was last formally reviewed December 2020 and is kept under regular review and updated where necessary.*See front page for details of subsequent amendments made.* |