



Age UK Mid Devon

Policy Manual

Name: PRIVACY POLICY

Last updated: Jan 2021

Due for review: Jan 2022

1. Who we are

- 1.1 Age UK Mid Devon are now closed permanently. We were previously an independent local charity working to support independence in later life. We worked with the over fifties in Mid Devon to provide information and advice, promote physical and mental wellbeing, and reduce loneliness and isolation.

Our registered charity number is 1070792.

We are also a company limited by guarantee in England and Wales.

Our registered company number is 3566678.

Our registered address is:

The Haven Centre
Broad Lane
Tiverton
EX16 5HE

Our office is closed and can no longer be reached.

2. How do we collect information from you?

- 2.1. Age UK Mid Devon will collect personal data when you first enquire about or access one of our services, enter into a contract of employment, or join the charity as a volunteer.
- 2.2. We also collect personal data when you use our website:
www.ageuk.org.uk/middevon

3. What information is collected from you?

- 3.1 For the majority of the work we do with you, Age UK Mid Devon will take your name, address, telephone number, and date of birth.
- 3.2. Depending on the service you are accessing, there will be times when we need to ask for sensitive data. This may include information regarding your health and support needs, disabilities, medication, living arrangements, or income and savings. Whenever data of this nature is required, you will be fully informed and the reasons for collecting this data will be explained. We will not collect this data without your full prior consent.
- 3.3. The personal information we collect when you are using our website might include your name, address, date of birth, email address, IP address, and information regarding what pages are accessed and when. If you make a donation online, your card information is not held by us. Donations are redirected to

www.justgiving.com and payments are made via that site.

4. How is your information used?

- 4.1. Your information is used within Age UK Mid Devon in order to keep an accurate record of the work we are doing with you.
- 4.2. Some data, such as dates of birth and postal district, is used in reporting and for statistical purposes. This data helps us monitor our services, as well as secure funding for the work we do, and enable us to fulfil required reports for existing funders. This data is always anonymised and cannot be used to identify individuals.
- 4.3. Age UK Mid Devon may use your case history as a case study in order to apply for funding and report back to funders. Case studies will always be anonymised. In the event that Age UK Mid Devon would like to use your case study publicly for PR and/or marketing purposes, we will inform you beforehand and you're your specific consent to do so.

5. Who has access to your data?

- 5.1. Your data will be used within Age UK Mid Devon and will only be available to staff and, where appropriate, volunteers within the organisation.
- 5.2. Age UK Mid Devon uses an online database called Charitylog (www.charitylog.co.uk) from Dizions Ltd. As managers and hosts of the software, Dizions have the capability to access your data, although they will only do so in exceptional circumstances.
- 5.3. There may be times when Age UK Mid Devon is not best placed to provide the required support or services, and it may be that we recommend referring you to another organisation.
Age UK Mid Devon will not pass your data on to any third party without first gaining your informed consent.
- 5.4. If in the course of the work that Age UK Mid Devon is doing, there are concerns for an individual's safety and wellbeing, it may be that we raise this with Care Direct (the adult social services within Devon County Council) as a safeguarding concern.
In the event of raising a safeguarding concern, we will share personal data with Care Direct as it is a legal requirement, and we do not need to gain consent in these instances.
- 5.5. As part of an application for employment or a voluntary position within the organisation, Age UK Mid Devon will require a DBS check, and will therefore be sharing some personal data with the Disclosure Barring Service.
- 5.6. Age UK Mid Devon will be closing and will cease to operate on December the 18th, 2020. As part of the closure process, and in order to comply with our legal obligations, have transferred client data to a third party.

This is a trusted third party, who will store the data but will not further process it, with the exception of Data Access Requests, deletion requests or to comply with a legal obligation or claim.

Personal data was transferred with minimal processing and we sought to ensure that your privacy rights will continue to be protected.

6. Lawful bases for processing data

- 6.1. Your data will be processed internally by Age UK Mid Devon in order for us to support you or for you to access a service. This processing is done by **consent** – i.e. at the request of the service user.
You will be notified whenever we are collecting or recording data.
- 6.2. When collecting personal data of a **sensitive** nature, Age UK Mid Devon will always first gain your **consent**. Processing is carried out under condition (a) of article 9(2) of GDPR – that the data subject has given **explicit consent** for processing.
- 6.3. In the instance of a safeguarding concern arising, we may need to share personal data with Care Direct. This processing is a **legal obligation**.
- 6.4. There may be times when it is in the **legitimate interests** of Age UK Mid Devon to contact other agencies and share personal data when it is not possible or realistic to gain consent (for instance, if a client has not been attending our day centre and we haven't been notified). In these instances, we will contact a third party only if we feel it is necessary and in the best interests of the data subject. We will also take steps to ensure that any data shared is kept to a minimum. It is also possible that we may need to share sensitive data (such as current medication) in such instances, without prior consent.
- 6.5. Depending on the role within the organisation, our sharing of data to obtain a DBS check is either a **legal obligation** – for individuals who will be working with vulnerable adults – or in the **legitimate interests** of the organisation – to ensure we minimise any risks to the safety and wellbeing of our clients.
- 6.6. Further processing of personal data for reporting and statistical purposes is in the **legitimate interests** of the organisation, as it allows us to oversee and plan our provision of services to best effect, and to secure and maintain funding for the services we offer.
Personal data used for reporting and statistics is anonymised.

7. How to access or update your data

- 7.1. As a client or member of the organisation, you have the right to access the data we hold about you and to ensure it is accurate and up to date.
- 7.2. As of December 18th, 2020, Age UK Mid Devon is permanently closed and no longer operating. As such, you will no longer be able to contact us to request a copy of your personal data, or to have your data amended or deleted.

- 7.3. If you require access to your data to make a claim or for legal reasons, please contact Bluegrass IT support:

[https://bluegrass-group.com/privacy-policy-2/
ask@bluegrass-group.com](https://bluegrass-group.com/privacy-policy-2/ask@bluegrass-group.com)

01392 207194 and ask to speak to the Privacy Officer

- 7.4. For more information on how your data is stored or accessed from Bluegrass, please refer to their Privacy Policy at <https://bluegrass-group.com/privacy-policy-2/> or contact them as above.

8. Withdrawing consent

- 8.1. As of December 18th 2020, Age UK Mid Devon is permanently closed and will no longer be operating as an organisation. As such, you will no longer be able to withdraw your consent.
- 8.2. Any current personal data that the charity held at the time of closure will be transferred to a third party, as detailed in section 7 of this Policy.
- 8.3. Personal data will not be further processed or shared following the transfer, and will only be accessed in order to comply with legal claims or obligations.

9. How long is my data held for?

- 9.1. Once you are no longer accessing our services, Age UK Mid Devon will continue to hold your data for four years. After this, some data is kept for statistical and reporting purposes, but is fully anonymised and not able to be used to identify any individual.
- 9.2. We are required by law to hold data in some instances, and Age UK Mid Devon will retain data in order to fulfil our legal obligations.
- 9.3. Age UK Mid Devon will be closing and will cease to operate on December the 18th, 2020. As part of the closure process, and in order to comply with our legal obligations, we will be transferring client data to a third party, as outlined in section 7 of this Policy.

10. Marketing and profiling

- 10.1. Age UK Mid Devon do not currently engage in direct marketing activities. This means we will only contact you with regards to the work we are currently doing with you, or any service you are currently accessing or wish to access.

- 10.2. In the event that we start direct marketing in the future, we will only do so with prior informed consent, and this consent will be able to be withdrawn at any time (see section 8).
- 10.3. Age UK Mid Devon do not use any form of automated profiling.
- 10.4. During the course of our work with you, it may be that we feel you would be interested in or benefit from one of the other services we offer. We will only refer you to one of our other services with your knowledge and consent.
- 10.5. Age UK Mid Devon will be closing and will cease to operate on December the 18th, 2020. As part of the closure process, and in order to comply with our legal obligations, we will be transferring client data to a third party, as outlined in section 7 of this Policy.
Once the data is held by the third party, it will not be available to them for any marketing or profiling purposes.

11. Transferring your information outside of Europe

- 11.1. As part of the service offered to you through our website, your data may be transferred outside of the EU – for instance, 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.
- 11.2. If we transfer your data outside of the EU in this way, we will take steps to ensure that appropriate security measures are taken with the aim of ensuring that your privacy rights continue to be protected as outlined in this Policy.
- 11.3. Other than in the ways outlined above when accessing our website, Age UK Mid Devon do not transfer data outside the EU.

12. Cookies

- 12.1 Cookies are small pieces of software which are installed on a computer or mobile device via a web browser. 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.

By using and browsing the Age UK Mid Devon website, you consent to cookies being used in accordance with our policy. If you do not consent, you must turn off cookies or refrain from using the site.

Most browsers allow you to turn off cookies. To do this, look at the 'help' menu on your browser. Switching off cookies may restrict your use of the website and/or delay or affect the way in which it operates.

- 12.2 Most modern browsers will offer different ways to configure how they handle cookies. This can vary from only allowing cookies from websites that you trust to blocking all cookies by default.

For more advice on managing cookies, have a look at the [All About Cookies](#) website.

Please note that switching off cookies may restrict your use of the website and/or delay or affect the way in which it operates

- 12.3 By using our website, our social media pages (such as Facebook, Twitter, YouTube, and Instagram), subscribing to our services, and/or making a donation to us, you agree that, unless you disabled them within your internet browser, we can place the types of cookies set out below on your device and use that data in accordance with this Policy

- 12.4 In order for us to help understand how the Age UK website is used and to improve website performance, we use a number of cookies to track usage. This list below contains the main cookies set on the Age UK website and for what purpose:

Performance cookies (__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.

Targeting and advertising cookies (_drt_id BCSI-CS-5B059C53EB35D97E ug)

Age UK sometimes use 3rd party agencies to advertise and bring traffic to certain parts of the site, for example where we have a specific campaign. These cookies are placed by one of our 3rd-party agencies to allow them to track the activities of visitors that have come to the site from their adverts

Targeting and advertising cookies (_fr)

Provided by Facebook, this pixel matches Facebook user profiles anonymously, enabling retargeting on the Facebook platform, as well as the creation of lookalike audiences. This pixel allows Age UK to analyse marketing efforts, and send the most relevant advertising to the correct audience.

Google Analytics

Google Analytics is a product provided by Google that lets us measure the Age UK website performance as well as the return on investment from our digital marketing, to ensure we are providing the best service for our users.

[Find out more on the Google website](#)

Facebook

Facebook is a social media platform used by both individuals and organisations or different brands. Age UK Mid Devon is active on Facebook, and uses the platform to communicate to supporters through both unpaid and paid posts. We use cookies and similar technologies (also known as tags/pixels/beacons/floodlights) on our Facebook pages to personalise content and digital advertising, provide social media features and analyse traffic.

[Find out more on the Facebook website](#)

13. Policy review

- 13.1 This Policy will be reviewed annually, or as necessitated by changes in the law or our own procedures.

Amendment History:

Version	Date	Amendment History
1.0	May 2018	New Policy
1.01	06.06.2018	Added paragraph 6.4
1.02	13.09.2018	Added paragraph 6.2 to bring processing of special category data in line with GDPR guidelines
1.03	01.07.2019	Changed 9.1 to bring data retention in line with GDPR guidelines
1.04	30.01.2020	Added section 12, regarding the use of cookies
1.05	04.08.2020	Updated section 4.3 – explicit description of use of case studies and when we will gain consent
1.06	26.11.2020	Added sections 5.6, 7.7, 8.4, 9.3 and 10.5 to include information regarding the closure of the charity
1.07	22.01.2021	Amended sections 1.1, 5.6, 7.2, 7.3, 7.4, 8.1, 8.2, 8.3, 9.3 and 10.5 to include information regarding the storage and use of personal data following the closure of the charity Removed sections 7.5, 7.6 and 7.7, pertaining to accessing personal data via Age UK Mid Devon

