

# Data Privacy Policy

**Age Concern Worcester and Malvern Hills** also known as **Age UK Worcester and Malvern Hills** (Registered Charity 1114859)

## Your personal data – what is it?

Personal data relates to a living individual who can be identified from that data. Identification can be by the information alone or in conjunction with any other information in the data controller's possession or likely to come into such possession. Processing of personal data is governed by the General Data Protection Regulation ("GDPR").

## Who are "we" / "us"?

**Age Concern Worcester and Malvern Hills**, also known as **Age UK Worcester and Malvern Hills**, is the data controller (contact details below). This means it decides how your personal data is processed and for what purposes.

## How do we process your personal data?

"We", comply with our obligations under the GDPR by keeping personal data up to date; by storing and destroying it securely; by not collecting or retaining excessive amounts of data; by protecting it from loss, misuse, unauthorised access and disclosure and by ensuring that appropriate technical measures are in place to protect personal data.

We use your personal data for the following purposes:

- To operate and deliver the services that individuals have requested;
- To inform individuals of news, events, activities or services run by us;
- To manage our employees and volunteers;
- To maintain our own accounts and records;
- To process gift aid applications;
- To contact individuals to conduct research about their opinions of current services or of potential new services that may be offered.

## What is the legal basis for processing your personal data?

The legal basis is dependent on why we are processing data and will be one of the following:

- Consent of the data subject;
- Processing is necessary for the performance of a contract with the data subject or to take steps to enter into a contract. Details of contracts include using our "Handyperson" service or "Help at Home" (also known as "Homeworker") service, being a "Homeworker", or having a delivery of goods purchased in one of our shops;
- There is a legal requirement for us to process the data, for example claiming Gift Aid.
- Processing is necessary to protect the vital interests of a data subject or another person (for example for Safeguarding or being recorded as a "Next of Kin" or "Emergency Contact"); or where the data subject is physically or legally incapable of giving consent;
- Processing is necessary for the legitimate interests of the data controller or a third party, except where such interests are overridden by the interests, rights or freedoms of the data subject. We believe that we have a legitimate interest in keeping the personal details of: (a) our clients with whom we have a relationship so that we can provide ongoing support and inform them of relevant other services; and (b) our volunteers so that we can manage their deployment.

## Sharing your personal data

Your personal data will be treated as strictly confidential and will be shared only with members of staff or volunteers where necessary. We will only share your data with third parties with your consent, (for example with a family member, carer, DWP, Job Centre or CAB), unless we are required to do so by law or to protect you (for example, if we have a safeguarding concern).

## Storing your data

Following your enquiry a database record will be created on a secure content management system called **CharityLog** (see <https://www.charitylog.co.uk>). CharityLog is the trading name of Dizons Ltd (<https://www.dizons.co.uk/>) a Company registered in Scotland (Registration No. SC340502)

CharityLog utilises secure cloud data storage in data centres with redundant backups, some of which may be in countries outside Europe. Their staff do not have access to your data unless specifically instructed by “us” and only temporarily in the cases of technical support or data migration. In these limited cases Dizons acts as a **Data Processor** on behalf of, and under specific instruction from, “us” as the **Data Controller**.

## How long do we keep your personal data?

We keep your personal data for no longer than reasonably necessary and we only retain your data for specific purposes and use criteria to determine how long to retain your personal data as detailed in our policy document “Privacy Standard” (document reference WD-0015).

We keep your details recorded in our database so that if you come back to us for further help we know how we have helped you before and can therefore give more tailored help. We may also contact you to let you know of other or new services we think might be appropriate for you.

We keep your details recorded in our database for a period of up to 6 years after your last contact with us for proof of a relationship with “us” for example for cases of legacies, future litigation or future complaints.

## Your rights and your personal data

Unless subject to an exemption under the GDPR, you have the following rights with respect to your personal data:

- The right to request a copy of your personal data which “we” hold about you. This will be provided within 30 days and be provided free of charge;
- The right to request that “we” correct any personal data if it is found to be inaccurate or out of date;
- The right to withdraw your consent to the processing at any time;
- The right to request that “we” provide the data subject with his/her personal data and where possible, to transmit that data directly to another data controller (known as the right to data portability), (where applicable).
- The right, where there is a dispute in relation to the accuracy or processing of your personal data, to request a restriction is placed on further processing;
- The right to object to the processing of personal data, (where applicable)
- The right to lodge a complaint with the Information Commissioners Office.

## Further processing

If we wish to use your personal data for a new purpose, not covered by this Notice, we will provide you with a new notice explaining this new use prior to commencing the processing and setting out the relevant purposes and processing conditions. Where and whenever necessary, we will seek your prior consent to the new processing.

## Contact Details

To exercise all relevant rights, queries of complaints please in the first instance contact the Chief Executive Officer at Bank House, 7 Shaw Street, Worcester. WR1 3QQ.

You can contact the Information Commissioners Office on 0303 123 1113 or via email <https://ico.org.uk/global/contact-us/email/> or at the Information Commissioner’s Office, Wycliffe House, Water Lane, Wilmslow, Cheshire. SK9 5AF.