

# Involve Northwest

## Privacy Notice Policy

At Involve Northwest we are committed to protecting and respecting your privacy.

The General Data Protection Regulation (GDPR) is a Europe-wide law that replaces the Data Protection Act 1998 in the UK. The changes in law come into effect from 25<sup>th</sup> May 2018 and aim to harmonise data privacy laws across Europe and offer greater transparency and control over personal data.

We have updated our Privacy Notice to reflect the changes introduced by GDPR.

This notice includes:

- **1. About us**
- **2. Information we collect**
- **3. How we use the information**
- **4. What grounds (legal basis) are we processing the data under?**
- **5. Sharing your information with third parties**
- **6. How we protect your data**
- **7. How long we hold your data**
- **8. Your rights regarding your personal information**
- **9. Right of complaint to the Regulator for Data Protection**
- **10. Updates to the privacy policy**
- **11. Contacting us**

**1. ABOUT US:** Involve Northwest is a non-profit organisation, based in Wirral offering a wide range of services to help improve the quality of life of local individuals and families.

We also provide room hire and office space for other local charities and businesses.

**Involve Northwest is a Controller and Processor of Personal Data.**

We have appointed a compliance team who are responsible for overseeing questions in relation to our privacy policies and procedures.

If you have any questions about our privacy policies including any requests to exercise your legal rights under GDPR, please contact the Compliance Team using the details below:

***Involve Northwest Compliance Team***

**Email:** [compliance@involenorthwest.org.uk](mailto:compliance@involenorthwest.org.uk)

**Tel:** 0151 644 4500

**2. WHAT INFORMATION WE COLLECT:**

## **Involve Northwest Privacy Notice Policy**

We collect personal and sometimes sensitive personal (this is not called sensitive data any more, it is special category) data you provide to us.

This includes information you give when registering on a programme with us when engaging and communicating with us. For example:

**Identity data** includes title, first name, maiden name, last name, marital status, date of birth, gender, CCTV images.

**Sensitive data** includes race, ethnicity, religious or philosophical beliefs, health conditions, genetic or biometric data.

**Contact data** includes address, telephone number, email address.

**Financial data** includes bank account numbers, household income, benefits / salary information.

**Transaction data** includes details of payments to or from you.

**Technical data** includes internet protocol (IP) address.

***It is important that the personal data we hold about you is accurate and current.***

***Please let us know if your personal data changes during your relationship with us.***

We may sometimes receive personal data from third parties. For example if we are partnering other organisations or another external agency wants to refer individuals to us for specialist support.

### **YOUNG PEOPLE**

We take great care to protect and respect the rights of individuals in relation to collecting and using their personal data, especially in the case of children.

**Parental or Guardian permission** will always be obtained from you as their parent or guardian to consent to us collecting, processing and storing personal and sensitive information before we can offer our support to them.

We will also need to obtain parental or guardian consent to give us permission to use photographs, video or other images of children.

### **HOW IS YOUR PERSONAL DATA COLLECTED?**

#### **Direct interactions**

You may give us your identity, sensitive, contact, and financial data by filling in forms, by corresponding with us by post, telephone or email, via our website or social media platforms or otherwise. This also includes when requesting our support or services, hiring room or office space and making a donation.

#### **Automated technologies or interactions**

## Involve Northwest Privacy Notice Policy

This includes:

- Internet protocol (IP) addresses, collected only when the “contact us” tabs on our website are clicked to input your personal data in a request for us to contact you
- CCTV images collected at our Royal Standard House premises

**We do not use cookies or any other analytic traces on our website**

### **3. HOW WE USE YOUR PERSONAL DATA**

**We will only ever use your personal data with your consent and when the law allows us to.**

We will use your personal data in the following circumstances:

- Where we need to enter into, perform a contract of support or service with you.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- Where we need to comply with a legal or regulatory obligation.
- To report, monitor and evaluate the effectiveness of our support or services offered.

### **4. WHAT ARE OUR LAWFUL BASES FOR PROCESSING?**

There are several lawful bases we process your data under:

**(a) Consent:** where you have given us consent. For example, you agree that we can process special category data in order to identify the right support for you

**(b) Contract:** we need the information to perform the contract we have with our funders, or where we have signed a service contract with you. For example, to evidence that you are a Wirral resident

**(c) Legal obligation:** the processing is necessary for us to comply with the law. For example, health and safety regulations

**(d) Vital interests:** the processing is necessary to protect someone’s life. For example, safeguarding

**(e) Legitimate interests:** where processing is to do with the legitimate interests of us running our business. For example, it allows us to manage our relationship with you effectively and efficiently and fairly promote our services

Please visit the Information Commissioner’s Office website for more guidance:

<https://ico.org.uk/>

\***ReachOut** clients may also wish to view the DWP Privacy Notice and Personal Information Charter:

<https://www.gov.uk/government/organisations/department-for-work-pensions/about/personal-information-charter>

### **5. SHARING YOUR INFORMATION**

## **Involve Northwest Privacy Notice Policy**

We may share personal data with our partner organisations or other external agencies where you have given us permission to or where there are other lawful bases to do so. For example:

### **Personal Data**

- Name
- Identification number
- Location data
- Online identifier (e.g. IP Address)
- Economic, cultural or social identity
- Video CCTV
- Login/Password

### **Special Category Personal Data**

- Racial or ethnic origin
- Political opinions
- Religious or philosophical beliefs
- Trade union membership
- Genetic or biometric data
- Health
- Sex life or orientation
- Criminal convictions and offences

We share your personal data to the contract provider who funds the programme you have signed up to receive support from. This is for contract reporting, monitoring and evaluation purposes. We will never share your personal information for marketing purposes.

## **6. HOW WE PROTECT DATA**

### **Data Security**

We have put in place appropriate data security measures to comply with GDPR to prevent your personal data from being accidentally lost, used, altered, disclosed or accessed in an unauthorised way.

We also limit access to your personal data to those employees or third party agents who have an agreed lawful business need to know and who are subject to a duty of confidentiality in their role.

Electronic data and databases are stored on our secure GDPR compliant computer systems.

We cannot guarantee the security of your home computer or any other personal devices you use to access the internet to send us online communications therefore Information you provide us in this way is the users own risk.

We have put in place strict procedures to deal promptly with any suspected personal data breach and will notify you and the appropriate regulatory body of any breach where we are legally required to do so.

Any data collected that are considered 'special category data' that we require and processed for monitoring, performance and reporting purposes will be anonymised to ensure maximum security.

# Involvement Northwest Privacy Notice Policy

## **CCTV**

Our Royal Standard House premises have CCTV in operation and is there to help provide security to protect both you and Involvement Northwest. CCTV will only be viewed when necessary to detect or prevent crime. The footage is only stored temporarily and unless it is flagged for review will be recorded over after 10 days.

Involvement Northwest complies with the Information Commissioner's Office CCTV Code of Practice and we have notices on display so you know that CCTV is in use.

## **STORAGE**

Involvement Northwest's operations are based in the UK, all data is adequately protected as we store all data securely within the European Union.

### **7. HOW LONG WILL WE USE YOUR PERSONAL DATA FOR?**

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including the purposes of satisfying any legal, accounting, reporting or monitoring and evaluation requirements. Each of our funders has a set directive to which we comply with in regards to data storage. For further information on any specific service please contact our Compliance Team.

Details of retention periods for all our contracts are available in our Retention Policy which you can request from us by contacting our Compliance Team.

In some circumstances we may anonymise your personal data (so that it can no longer be associated with you) for statistical purposes in which case we may use this information indefinitely without further notice to you.

### **8. YOUR LEGAL RIGHTS**

You have rights under Data Protection laws in relation to your personal data which are as follows:

- Correcting your Information

You are entitled to have your personal information updated to ensure it is up to date and accurate. In order to maintain the accuracy of the information we hold, please let us know about any updates to your personal information as soon as you can.

- Withdrawing Consent

You have the right to withdraw your consent to any processing that is currently being done under your consent, such as marketing.

- Obtaining a copy of your information

You have the right to receive copy of the personal information we hold about you and we must respond within 1 month.

## **Involve Northwest Privacy Notice Policy**

- Deleting your information

You can request that we delete personal information in certain circumstances. These will be specific to each case.

- Data Portability

In certain circumstances, you have the right to ask us to transfer the personal information that you have given us to another controller.

- Restricting Processing

You can request a restriction on the processing of your data in some limited circumstances. Examples are concerns over data accuracy or we no longer need to hold your data but you have requested its retention by us to aid you in a legal matter.

- Object to Processing

You have the right to request that we stop processing your data for marketing purposes and in other limited circumstances such as asking us not to process your data by wholly automated means or not to analyse your information for targeted content etc. (also known as profiling).

**If you wish to exercise any of the rights set out above please contact our Compliance Team.**

We will always try to respond to your satisfaction, there may however be situations where we will be unable to do so because there are exceptions to the rights above or where it is necessary for us to continue to use data for a lawful reason.

ESF Participants cannot claim right to erasure or right to data portability.

### **The Information Commissioner's Office (ICO)**

The data protection laws in the UK are regulated and enforced by the Information Commissioner's Office (ICO). Each individual has the right to raise a concern/complaint to the ICO if they have any concerns about how their personal information and/or privacy is treated. You can do this via the [ICO's website](#), follow the links or have an online Live Chat.

Call the ICO helpline on [0303 123 1113](tel:03031231113)

Email [casework@ico.org.uk](mailto:casework@ico.org.uk)

Postal address: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF

### **CHANGES TO THIS PRIVACY NOTICE**

We will amend this Privacy Notice from time to time to ensure it remains up to date and accurately reflects how and why we use your personal data. The current version of our Privacy Notice will always be posted on our website.

## **Involve Northwest Privacy Notice Policy**

*Involve Northwest Compliance Team*

*Royal Standard House, 334 New Chester Road, Rock Ferry, Wirral, CH42 1LE*

*Email: [compliance@involvenorthwest.org.uk](mailto:compliance@involvenorthwest.org.uk)*

*Tel: 0151 644 4500*

*This Privacy Notice was last updated on 22.05.2020*