

PADDOCK WOOD COMMUNITY ADVICE CENTRE WEBSITE PRIVACY NOTICE (GDPR VERSION)

Welcome to the Paddock Wood Community Advice Centre's privacy notice.

Paddock Wood Community Advice Centre respects your privacy and is committed to protecting your personal data. This privacy notice will inform you as to how we look after your personal data when you visit our website (regardless of where you visit it from) and tell you about your privacy rights and how the law protects you.

IMPORTANT INFORMATION AND WHO WE ARE

This privacy notice aims to give you information on how PWCAC collects and processes your personal data through your use of this website, including any data you may provide through this website when you sign up to our quarterly newsletter or submit an enquiry.

This website is not intended for children and we do not knowingly collect data relating to children.

It is important that you read this privacy notice together with any other privacy notice or fair processing notice we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This privacy notice supplements the other notices and is not intended to override them.

Paddock Wood Community Advice Centre is the controller and responsible for your personal data (collectively referred to as "PWCAC", "we", "us" or "our" in this privacy notice).

If you have any questions about this privacy notice, including any requests to exercise your legal rights, please contact the Manager using the details set out below.

The Manager
Paddock Wood Community Advice Centre
64 Commercial Road
Paddock Wood
Kent
TN12 6DP

Email address: info@pwadvice.org

Telephone number: 01892838619

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues (www.ico.org.uk). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

This website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy notice of every website you visit.

THE LAWFUL BASES FOR PROCESSING YOUR PERSONAL DATA

The six lawful bases for processing personal data under the GDPR are:

- (a) Consent: the individual has given clear consent for you to process their personal data for a specific purpose.
- (b) Contract: the processing is necessary for a contract you have with the individual, or because they have asked you to take specific steps before entering into a contract.
- (c) Legal obligation: the processing is necessary for you to comply with the law (not including contractual obligations).
- (d) Vital interests: the processing is necessary to protect someone's life.
- (e) Public task: the processing is necessary for you to perform a task in the public interest or for your official functions, and the task or function has a clear basis in law.
- (f) Legitimate interests: the processing is necessary for your legitimate interests or the legitimate interests of a third party unless there is a good reason to protect the individual's personal data which overrides those legitimate interests. (This cannot apply if you are a public authority processing data to perform your official tasks.)

HOW IS YOUR PERSONAL DATA COLLECTED

In most cases, PWCAC will collect data from you personally, by email, telephone or in person. We also collect data from you via our online submission form. We will usually ask you for your consent to allow us to collect, use, store and share your information.

At times we might use or share your information without your consent. If we do, we will usually make sure there's a legal basis for it.

THE DATA WE COLLECT ABOUT YOU

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

PWCAC may collect, use, store and transfer different kinds of personal data about you which we have grouped together follows:

- Identity Data includes first name, maiden name, last name, username or similar identifier, marital status, title, date of birth and gender
- Contact Data includes address, email address and telephone numbers
- Financial Data includes bank account details
- Usage Data includes information about how you use our service
- Marketing Data includes your preferences in receiving our quarterly newsletter

PWCAC may collect, use, store or transfer Special Categories of Personal Data about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data, information about criminal convictions and offences). We will always ask you for your explicit consent to the processing of any of the special categories of personal data for one or more specified purposes.

We also collect, use and share Aggregated Data such as statistical or demographic data for any purpose. Aggregated Data may be derived from your personal data but is not considered personal data in law as this data does not directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific service.

HOW WE WILL USE YOUR PERSONAL DATA

PWCAC will only use your personal data to help solve your problems or improve our services. We only ask for the information we need and let you decide what you're comfortable telling us, explain why we need it and treat it as confidential.

CHANGE OF PURPOSE

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact the Manager and the address provided above.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

MARKETING

PWCAC produces a quarterly newsletter which falls within the definition of direct marketing. We will not use your personal data for marketing purposes unless you have given us your consent to do so. You can ask us to stop sending you our quarterly newsletter at any time by emailing info@pwadvice.org.

PWCAC will never share your personal data with any third party company for marketing purposes.

DISCLOSURES OF YOUR PERSONAL DATA

We may have to share your personal data with Specific or External Third Parties.

External Third Parties may include:

- ACM Solutions, who provide our Case Management System "AdvicePro", acting as Data Processor and based within the UK
- Recognising Excellence, who conduct our Advice Quality Standard Audit on behalf of the Advice Services Alliance and based within the UK

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

INTERNATIONAL TRANSFERS

We do not transfer your personal data outside the European Economic Area (**EEA**).

DATA SECURITY

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those volunteers, employees and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

DATA RETENTION

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

We will keep your case records for a minimum of 6 years, before disposing of it securely.

In some circumstances you can ask us to delete your data: see point 3 below for further information.

YOUR LEGAL RIGHTS

Under certain circumstances, you have rights under data protection laws in relation to your personal data:

- (1) **The Right to request access to your personal data**
Commonly known as a "data subject access request". This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.
- (2) **The Right to request correction of your personal data**
This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.
- (3) **The Right to request erasure of your personal data**
This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.
- (4) **The Right to object to processing of your personal data**
Where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.
- (5) **The Right to request restriction of processing your personal data**
This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where

our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

(6) The Right to request transfer of your personal data

We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

(7) The Right to withdraw consent

Where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent

If you wish to exercise any of the rights set out above, please contact the Manager and the address provided above.

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

Adopted on: 25 May 2018

Last reviewed:

Next review: April 2019