

CVS Brent Privacy Policy

Personal data

“Personal data” is any information about a living individual which allows them to be identified directly or indirectly from that data (examples include a name, photographs, videos, email address, or address).

CVS Brent and personal data

CVS Brent supports local charities and community organisations in Brent by building their capacity to respond to the needs of local residents and their communities. To enable us to provide our services we may need to collect and process the following personal data:

- Names, titles, and aliases, photographs;
- Contact details such as telephone numbers, addresses, and email addresses;
- Where it is appropriate or a requirement we may process profile data about your organisation which might include details of your trustees, directors, or senior officers;
- Where it is appropriate or a requirement we may process demographic information such as gender, age, date of birth, marital status, nationality, education/work history, academic/professional qualifications, hobbies, family composition, and dependants;
- Information about any specific accessibility requirements so that we can deliver accessible services;
- Information about any specific dietary requirements so that we can accommodate your dietary needs where we offer catering for events and meetings;
- Information about your health – only for the project to refer you to voluntary and community services and activities that can assist with health and wellbeing.
- Where you make donations or pay for activities such as use of our Training Suite or Meeting Room, financial identifiers such as bank account numbers, payment card numbers, payment/transaction identifiers, policy numbers, and claim numbers;
- Information about your religious beliefs where that might be relevant to a particular service or activity.

CVS Brent as Data Controller

Where CVS Brent stores and controls personal data the GDPR designates us as “Data Controller” for these purposes. This imposes legal obligations on us to ensure we keep personal data up to date; store and destroy it securely; not collect or retain excessive amounts of data; keep personal data secure, and protect personal data from loss, misuse, unauthorised access and disclosure and to ensure that appropriate technical measures are in place to protect personal data.

How and why we use personal data

- To enable us to meet all legal and statutory obligations;
- To enable us to deliver our services to the community;
- To comply with our safeguarding policies;
- To administer our membership records;
- To fundraise and promote the interests of the voluntary and community sector;
- To maintain our own accounts and records. For case management we use Freshdesk, a cloud based service which is GDPR compliant;
- To process a donation that you have made (including Gift Aid information);
- To seek your views or comments;
- To notify you of changes to our services, events and staff updates;
- To send you communications which you have requested and that may be of interest to you. These may include information about campaigns, appeals, other fundraising activities;
- To process a grant or application;
- To enable us to provide a voluntary service for the benefit of the public in a particular geographical area as specified in our memorandum of articles;
- To enable us to profile you or your organisation if we become aware of services or funding opportunities for which you might be eligible;
- To enable us to provide targeted communication to your organisation to provide updates, news, or communications that might be relevant to you;
- To enable us to provide marketing information to your organisation about our work, events, training, fundraising opportunities, local and national policy updates, job vacancies, offers and resources from other voluntary and community organisations in Brent. CVS Brent now adopts an “Opt-in” only approach to marketing communications, this means that we will not email you any information unless you have given us your consent;
- To enable us to provide case studies. To monitor our services and to better assess our impact, if you have used/accessed our services in the past, we may contact you to ask if you

would be willing to participate in a case study interview. If you accept, we will ask for information about the support you have received from CVS Brent. You will have control of this information and decide how CVS Brent can use it. We will provide you with a consent form specifying varying levels of consent to use this information in the public domain. You will always get a copy of the edited interview transcript;

- The CVS Brent website operates cookies for which we will ask your consent to install;
- The CVS Brent website operates social media plugins which are GDPR compliant and will adhere to any privacy settings you have chosen for your social media accounts;
- The CVS Brent website operates a Google Analytics plugin to monitor website usage. This is GDPR compliant and all user data is anonymised;
- CVS Brent uses online services to facilitate event management. Any data those services collect will be in accordance with their own privacy policy. We may also collect data when you register or pay for an event;
- Our processing may also include the use of CCTV systems for the prevention and prosecution of crime;

Storing your personal data

All our online data is stored on cloud based services. These services are GDPR compliant, password protected, and access to that data is strictly controlled.

Printed copies of personal data are kept in locked filing cabinets. Documents that are no longer needed are shredded.

The legal basis for processing your personal data

Most of our data is processed because it is necessary for our legitimate interests, or the legitimate interests of a third party.

Some of our processing is necessary for compliance with a legal obligation. For example, we might need to process a DBS check.

We may also process data if it is necessary for the performance of a contract, or to take steps to enter into a contract, for example, a contract to hire our training room.

Where your information is used for any other reason, we will first obtain your consent to use that data.

Sharing personal data

Your personal data will be treated as strictly confidential. It will only be shared with third parties where it is necessary for the performance of our tasks or where you first give us your

prior consent. It is likely that we will need to share your data in some or all of the following cases (but only where necessary):

- Third parties where it is a contractual obligation or a condition of our funding;
- Our agents, servants and contractors;
- Other partner organisations with which we carry out joint activities or events;

Retaining personal data

We will keep some records permanently if we are legally required to do so. We may keep some other records for an extended period of time. For example, it is current best practice to keep financial records for a minimum period of 7 years to support HMRC audits. In general, we will endeavour to keep data only for as long as we need it. This means that we may delete it when it is no longer needed.

Updating your personal data

Where possible CVS Brent uses publicly available sources to keep your organisation's records up-to-date, such as Companies House, the Charity Commission and other third-party public directories.

With your consent, we may also contact you periodically to check that the data we hold on you or your organisation is up-to-date. CVS Brent will do this by phone or direct email.

Your rights and your personal data

You have the following rights with respect to your personal data.

When exercising any of the rights listed below, in order to process your request, we may need to verify your identity for your security. In such cases we will need you to respond with proof of your identity before you can exercise these rights:

1. The right to be informed

- You have the right to be informed if we collect or process your personal data. What purposes your data is used for. The length of time that data will be retained. And who it will be shared with.

2. The right to access information we hold on you

- At any point you can contact us to request the information we hold on you as well as why we have that information, who has access to the information and where we obtained the information from. Once we have received your request we will respond within one month.
- There are no fees or charges for the first request but additional requests for the same data may be subject to an administrative fee.

3. The right to rectify the information we hold on you

- If the data we hold on you is out of date, incomplete or incorrect, you can inform us and request your data be updated. We will respond to your request within one month. We can decline your rectification request if we believe the information we hold is correct. We may also request a fee or decline to comply if your request is unfounded or excessive.

4. The right to have your information erased

- If you feel that we should no longer be using your data or that we are illegally using your data, you can request that we erase the data we hold.
- When we receive your request we will confirm whether the data has been deleted or the reason why it cannot be deleted (for example because we need it for our legitimate interests or regulatory purpose(s)).

5. The right to restrict processing of your data

- You have the right to restrict the processing your data in certain circumstances. This will apply if you have an issue with the accuracy of the information or you have concerns about how the data has been processed. A restriction will normally be temporary to allow time to investigate and correct any problems with the data. We will inform you before any restriction is lifted.

6. The right to data portability

- You have the right to request that we transfer some of your data to another controller. We will comply with your request, where it is feasible to do so, within one month of receiving your request.

7. The right to object to the processing of personal data where applicable.

- You have the right to request that we stop processing your data in certain circumstances. If you wish to stop receiving direct marketing from us the right to object is absolute. In other cases your right to object may depend on whether we have a legitimate interest to process your data. Upon receiving the request we will contact you and let you know if we are able to

comply or if we have legitimate grounds to continue to process your data. Even after you exercise your right to object, we may continue to hold your data to comply with your other rights or to bring or defend legal claims.

8. Rights related to automated decision making, including profiling.

- You have the right to be informed if any of your data will be used for automated decision making or profiling. You have the right to object to an automated decision. You have the right to object to your data being used for profiling.

Transfer of Data Abroad

Any electronic personal data transferred to countries or territories outside the EU will only be placed on systems complying with measures giving equivalent protection of personal rights either through international agreements or contracts approved by the European Union. Our website is also accessible from overseas so on occasion some personal data (for example in a newsletter) may be accessed from overseas

Further processing

If we wish to use your personal data for a new purpose, not covered by this Policy, then 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

Please contact us if you have any questions about this Privacy Policy or the information we hold about you or to exercise all relevant rights, queries or complaints to:

Anju Bhatt
CEO
CVS Brent
5 Rutherford Way
Wembley
HA9 0BP

Email: a.bhatt@cvsbrent.org.uk

Telephone: 020 3011 1690

Information Commissioner's Office

If you believe CVS Brent has misused your data or not kept it secure you can lodge a complaint directly with the Information Commissioners Office:

Information Commissioners Office (Head Office)

Wycliffe House
Water Lane
Wilmslow
Cheshire SK9 5AF

Email: casework@ico.org.uk

Telephone: 0303 123 1113

Textphone: 01625 545860

Live chat: <https://ico.org.uk/global/contact-us/live-chat>

Website: <https://ico.org.uk/make-a-complaint/>

Date Agreed: 20th August 2018

Date of Review: August 2020