

Headway

Northumberland

Privacy Policy

Headway Northumberland is committed to protecting and respecting your privacy. We take your privacy very seriously and it is important to us that you can provide personal data to us without having to compromise your privacy in any way.

This privacy notice sets out the basis on which any personal data we collect from you or others, or that you provide to us, will be processed by us. Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it.

Important information and who we are

Headway Northumberland is the controller and responsible for your personal data (collectively referred to as "Headway Northumberland", "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 us using the details set out below.

Contact details

Name: Rachael Jobson

Email address: rachaeljobson@sky.com

Postal address: 2 Tyelaw Meadows, Shilbottle, Alnwick, NE66 2JJ

Telephone number: 07860142168

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.

Inform us of changes

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 membership with us.

Third-party links

Our website <http://www.headwaynorthumberland.org> 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.

Information we collect about you

We will need to collect certain personal information in order to provide our service to you. The information collected may include:

- name, address, telephone number and email address;
- Details of your family members;
- Where you provide it, information about your hobbies and interests;
- Information you provide to us for the purposes of attending meetings and events, including dietary requirements;
- Special Category Data including details about your health and disability;

Sensitive Personal Data

It may benefit you to notify us of any health condition or disability you have so that we are aware of these conditions and how they affect you. This will allow us to take any reasonable steps to accommodate specific needs or requirements you have when providing our services to you. This type of information is known under the law as 'special category information'.

How is your personal data collected?

We use different methods to collect data from and about you including through:

Direct interactions. You may give us your details directly by corresponding with us via our website, by post, phone, email or otherwise. This includes personal data you provide when you:

- Complete the membership application form.
- Provide personal information for us through our website to be able to contact you.
- Provide us with information in relation to your attendance at any of our events.
- Complete any "contact us" forms.
- Request information to be sent to you.

Third parties or publicly available sources. We may receive personal data about you from various third parties as set out below:

- A third party such as doctor or other medical professionals (this would be with your consent).

How will we use the information we collect?

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- In order to provide our services to you.
- To provide you with details of events.
- Where we need to comply with legal or regulatory obligations.
- Where you have given consent.

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 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.

Who we share your information with?

We do not normally have the need to provide information we retain on any of our data subjects to organisations or individuals outside Headway Northumberland, other than to Social Services and other related statutory bodies during the course of client reviews and I or to any company which Headway Northumberland engages to undertake its administration processes. When we are asked to participate in service-user reviews, or if for any other reason we intend to pass information to another agency, we will always inform the data subject (service user, volunteer or staff member) of the information we intend to reveal and seek their agreement to our doing so.

If any information is disclosed with agreement, we require all third parties to respect the security of your personal data and to treat it in accordance with the law.

We may use social media sites such as Facebook, LinkedIn and Twitter. If you use these services, you should review their privacy policy for more information on how they deal with your personal information

How do we protect your personal data?

Any personal data we collect, record or use in any way, whether it is held on paper, **comp** or on other media, will have appropriate safeguards applied to it to ensure we comply with the General Data Protection Regulation (May 2018) and the Data Protection Act, 1998 and adhere to the 8 principles of data protection, as set out in the Act, which states that personal data must be:

- Fairly and lawfully processed
- Processed for limited purposes and not in any other way which would be incompatible with those purposes
- Adequate, relevant and not excessive
- Accurate and kept up to date
- Not kept for longer than is necessary for the purpose
- Processed in line with the data subject's rights
- Kept secure, and
- Not transferred to a country which does not have adequate data protection laws

In order to adhere to these principles, we will:

- Observe the conditions concerning the fair collection and use of personal data
- Meet our obligations to specify the purposes for which personal data is used
- Collect and process appropriate personal data only to the extent that it is needed to fulfil operational needs or to comply with any legal requirements
- Ensure the quality of personal data used
- Apply strict checks to determine the length of time personal data is held
- Ensure that the rights of individuals about whom the personal data is held can be fully exercised under the Act
- Take appropriate security measures to safeguard personal data, and
- Ensure that personal data is not transferred abroad without suitable safeguards.

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.

Data will be stored on a computer owned and operated by the Secretary, Rachael Jobson, and which are protected by a high level of security to prevent any unauthorised access to the data. Paper copies of the documentation will be stored within 2 Tyelaw Meadwss, Shilbottle, Alnwick, NE66 2JJ. The building is secured by an alarm system and mortis locks on all doors, and is stored within a locked filing cabinet.

The password for the computer on which the information is stored is known only to the secretary.

If there is any suspected personal data breach Headway Northumberland will notify you and any applicable regulator of a breach where we are legally required to do so.

When any information or data held by Headway Northumberland is shared it will be shared electronically and will be password protected.

If the data is to be taken off site it will only be transported electronically on a password protected device. If, any paper documents must leave site, they will be stored securely in a locked vehicle or property at all times or held on the person responsible for the data.

Headway Northumberland respects the privacy of data subjects and in connection with the handling of information it will ensure that:

- The Secretary is the Data Controller for Headway Northumberland and as such assumes overall responsibility for data captured and stored
- Everyone managing and handling personal information known as Data Collectors understands the requirements of the Act and their responsibilities under it. The Data Collectors are: Lynn Jones, Ron Payne
- Everyone managing and handling personal information is appropriately trained to do so
- Everyone managing and handling personal information is appropriately supervised
- Queries about handling personal information are promptly and efficiently dealt with
- The way in which personal information is managed will be reviewed and audited from time to time.
- Methods of handling personal information are kept under review and assessed and evaluated as appropriate

Your Rights

Under data protection legislation, you have several rights regarding the use of your personal data, as follows:

- 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.
- Request correction of the personal data that we hold about you. 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.
- 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.
- Request restriction of processing of 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.
- Request the transfer of your personal data to you or to a third party. 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.
- Withdraw consent at any time 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 services to you. We will advise you if this is the case at the time you withdraw your consent.

No fee usually required

Under the Data Protection Act and General Data Protection Regulations (May 2018) any individual may write to the Secretary (Data Controller) of Headway Northumberland, at the address noted above and request a copy of the information we hold about them. After proving their identity, the Data Controller will disclose to the individual all data held on them in an easily readable form and will be sent electronically. In accordance with GDPR information is provided free of charge within 30 days, however, Headway Northumberland reserves the right to charge a "reasonable" administration fee when a request is unfounded or excessive, or particularly if it is repetitive.

How to complain about the use of your data

If you wish to raise a complaint about how we have handled your personal data, including in relation to any of the rights outlined above, you can contact us on the details noted on the first page of this notice and we will investigate the matter for you.

Any breaches of data will be investigated by the Data Controller within 24 hours of notification and will be recorded in Headway Northumberland's Data Breach Register. Steps will be taken to mitigate the breach and the individual to whom the breach relates will be informed immediately and written to, to confirm details of the breach and to include the steps Headway Northumberland has taken. Where there is a considered serious breach, the Data Controller will inform The Information Commissioners Office (ICO) within 72 hours and the Charity Commission as soon as possible

If you are not satisfied with our response, or believe we are processing your data unfairly or unlawfully, you can complain to the Supervisory Authority - Information Commissioner's Office (ICO), Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF. You can find further information about the ICO and their complaints procedure here: <https://ico.org.uk/concerns/>

Data will be stored for as long as data subjects remain a service-user of Headway Northumberland and for five years thereafter. Any data subjects requiring access to their data should write to the Data Controller i.e., Secretary. It is the responsibility of the data subject to advise Headway Northumberland of any changes to their personal details.

All confidential waste being sensitive data no longer required, will be disposed of by a confidential method.

FURTHER INFORMATION

For further information about the GDPR and how they affect you, please visit the Information Commissioner's website at:

www.ipo.gov.uk (where the full code is available to be downloaded)

If you have any queries you can contact the ICO's helpline on 0303 123 1113 or write to the ICO at:

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF