

# Full Privacy Notice

## 1 Introduction

BCH is committed to respecting and protecting your privacy. We believe in making things easy for people we interact with. We know there's nothing more off-putting than the sight of a lot of small print, so we've made our Privacy Policy clear, simple and easy to read.

Our policy is structured by answering common questions that people ask about how we protect data. You can review answers to these questions in relation to all services or the specific service you are interested in

## 2 Whats changed

There have been no material changes to the policy since it was last updated. We have changed the way it is presented.

## 3 Our promise to you

BCH is committed to protecting your privacy. Any processing of personal data, such as the name, address, e-mail address, or telephone number will always be carried out in accordance with the General Data Protection Regulation (GDPR).

We have implemented processes and security controls in line with industry best practice to keep your personal information safe. We will never sell your data to third parties.

We will be clear and open with you about why we collect your personal information and how we use it.

## 4 Who is in control of your Information?

We never lose sight of the fact that it is your personal information and you own it and can choose who has access to it and how its processed.

BCH are registered as the 'Data Controllers' with the Information Commissioner's Office (ICO).

Details are published on a register on the ICO website where you can also find lots of useful information about Data Protection, what it means to you as an individual and how it applies to companies like BCH.

The law within the European Economic Area gives those whose personal data is held by BCH specific rights to control the personal data held about them.

When you make a request

- We will respond within a month of you making the request
- We will not charge you for making a request unless the request is unreasonable.
- Where we refuse to respond to a request, we will explain why we are not responding and remind you that you can complain to the ICO.

These include the right to:

- right of access - to obtain from BCH, confirmation that personal data is held, as well as a written description of such personal data, the purpose(s) for which it is being used, the source(s) of the personal data and details of any recipients
- Right to rectification - request corrections of personal data which is inaccurate ie incorrect or misleading as to any matter of fact
- right to erasure - request deletion of data where
  - the personal data is no longer necessary for the purpose which it was originally collected or processed for
  - you withdraw consent for data which we are holding on the basis of consent or legitimate interest
  - you object to us processing your data for direct marketing
  - we have processed the personal data unlawfully
  - if there are circumstances where you do not have the right we will let you know promptly
- right to restrict processing - request BCH stops processing associated your personal data if
  - there is a dispute about accuracy of data
  - we no longer need the data, but you need us to keep it for legal claims
  - we have processed the personal data unlawfully
- right to data portability - request we provide you the personal data you have provided us in an electronic format eg CSV file. This applies where
  - basis for holding the data is consent or for the performance of a contract
  - we are proceeding the data electronically

If any individual wishes to contact BCH regarding the personal data held about them or has any other question about BCH data privacy procedures, they should direct an email to Rory Gillert - [RGillert@creightonhouse.org](mailto:RGillert@creightonhouse.org) send a letter to Rory Gillert at 378 Lillie Road, London SW6 7PH .

If any individual wishes to complain about how BCH is handling data or responding to requests they should contact the Information Commissioners Office - <https://ico.org.uk/concerns/handling/>

## 5 What we do with your Data

Most of the personal information we process is provided to us directly by you for one of the following reasons:

- You have requested to become a client of ours (whether by telephone, or email or by application form).
- You have made an enquiry about our services either at a marketing event or via our website
- You wish to attend, or have attended, an event organised by us.
- You subscribe to our e-newsletter.
- You have applied for a job or to volunteer with us.

We also receive personal information indirectly, in the following scenarios:

- You have been referred to us by another organisation or individual
- An employee, volunteer or client of ours gives your contact details as an emergency contact or a referee.

### 5.1 How Does BCH Obtain Personal Data

Most of the personal information we process is provided to us directly by you for one of the following reasons:

- You have requested to become a client of ours (whether by telephone, or email or by application form).
- You have made an enquiry about our services either at a marketing event or via our website
- You wish to attend, or have attended, an event organised by us.
- You subscribe to our e-newsletter.
- You have applied for a job or to volunteer with us.

We also receive personal information indirectly, in the following scenarios:

- You have been referred to us by another organisation or individual
- An employee, volunteer or client of ours gives your contact details as an emergency contact or a referee.

## 5.2 What Types of Personal Data Does BCH Collect and Use?

BCH, and third parties we use to provide services, need certain personal data to enable it to provide the services. The information collected will vary depending if the nature of our relationship with you and the services we are delivering to you. See individual services for details.

BCH will be what's known as the 'Controller' of the personal data you provide to us, this means we control what happens to the data in our possession.

We will only ever collect the data that we need, or must.

The personal data collected may include information the following sets:

- Personal details- data which identifies you and some of your characteristics. Examples include
  - For most individuals: names, addresses, contact details
  - For employees: age, sex, date of birth, physical descriptions, identifiers issued by public bodies, e.g. national insurance number.
- Financial details – information relating to your financial affairs. Examples are
  - For clients: payments, benefits
  - For employees: income, salary, assets and investments, loans, benefits, grants, insurance details, pension information.
- Online identifiers – information about how you are identified by computers. Examples include a User ID, IP addresses, cookie strings or mobile device IDs.

The following categories are generally collected for employees and often for clients depending on the services

- Family, lifestyle and social circumstances – information about you, and your family's lifestyle and social circumstances. Examples are details about current marriage and partnerships and marital history, details of family and other household members, habits, housing, travel details, leisure activities, membership of charitable or voluntary organisations.
- Education and training details - information about your education and professional training. Examples are academic records, qualifications, skills, training records, professional expertise, student and pupil records.
- Employment details - information about your employment. Examples are employment and career history, recruitment and terminations details, attendance record, health and safety records, performance appraisals,

## 5.3 How Does BCH Use the Personal Data it Holds?

Most of BCH's use of personal data is necessary to enable it to provide a service or product. How we use data and the legal basis on which we are processing data will vary depending on the relationship with CoAbb and the services requested. See individual services for details.

- Generally, for clients, the personal information we hold is used to deliver the requested services or provide information you request including order processing, delivery of service be it (deliverables from services eg workshops and newsletters) as well as for invoicing and to answer general enquiries.
- Generally, for employees and volunteers, the information is used to manage opportunities
- Generally, for other organisation the information is used to maintain business relationship.

The legal basis that we process data is mainly contract, legitimate interests or consent.

## 5.4 What Processing of Personal Data is done?

The processing will vary depending if the individual is a client or volunteer, and the services requested. See individual services for details.

## 5.5 Who Does BCH Share Personal Data with?

As a general rule, BCH does not disclose personal data to unaffiliated third parties except where client consent has been obtained.

We use third parties in running some pieces of our business and providing some of our services. With all our third parties we have contracts in place which require that they keep your data safe and can only process data in ways we have agreed. They will only share the information with us or with other organisations where we have approved the sharing. We will only approve sharing where they have the right contracts in place to protect your data.

In some circumstances we are legally obliged to share information, for example if we become aware of an issue which could impact an individual's wellbeing or potential criminal activity, or to protect our rights and/or comply with a judicial proceeding, court orders, request from a regulator or any other legal process served on BCH. If there is a takeover, sale or purchase of our business, we may disclose your personal data to the new (or prospective) owner of the business.

#### **5.6 How long does BCH keep the Personal Data it Holds?**

A broad summary of our retention policy in respect to personal data is:

- Where personal data is mentioned in relation to company financial records, data is kept for 7 years
- Personal data for clients is kept for 7 years after last interaction from client
- Personal data required for short term use eg responding to query; visitor log; CCTV, unsuccessful job applicant is kept up to 2 years
- Personal data for employees and volunteers is kept for 2 years after leaving BCH

#### **5.7 Does BCH Transfer Personal Data Overseas?**

In general, BCH and its third Parties do not transfer personal data outside the EU. BCH Data is located on devices and servers within the UK or EU.

There are some services that we use eg Mailchimp and SurveyMonkey which are based in the US. We rely on the Privacy Shield Framework to transfer this information to these organisations.

Exceptions are highlighted in individual service descriptions

## **6 Childrens Data**

BCH does not provide services directly to children or proactively collect their personal information. However, we are sometimes given information about children in relation to the services we offer. The information in the relevant parts of this notice applies to children as well as adults

## **7 Links and Other Services**

Where BCH provide links to websites of other organisations or refer to other services this privacy notice does not cover how those organisations processes personal information.

CoAbb would encourage you to read the privacy notices for the other organisations and websites you visit.

## **8 How Data Protected**

BCH regards the confidentiality and security of personal data we hold very seriously. BCH has implemented appropriate internal security procedures that restrict access to and disclosure of personal data within BCH. These procedures will be reviewed from time to time to determine whether they are being complied with and are effective. Where data is shared by 3rd parties they are bound by contract to do the same. BCH has implemented security measures such that it has achieved the Cyber Essentials Certification.

## **9 Policy Updates**

As part of BCH's commitment to compliance with data privacy requirements, and to reflect changes in BCH's operating procedures, BCH may update the terms of this policy from time to time

## **10 Contact Details**

If any individual wishes to contact BCH regarding the personal data held about them or has any other question about BCH' data privacy procedures, they should direct an email to Rory Gillert - RGillert@creightonhouse.org send a letter to Rory Gillert at 378 Lillie Road, London SW6 7PH .

## **A Reasons to Contact Us**

### **A 1 Make an enquiry**

This section describes how we process personal data when you make a general enquiry examples include questions about the charity, services the charity provides, hiring rooms or one of our events.

#### **A 1.1 How Does BCH Obtain Personal Data**

Data is collected from you when you make the enquiry

#### **A 1.2 What Types of Personal Data Does BCH Collect and Use?**

We use basic contact information in order that we can respond to query - examples name, address, phone numbers, email address

If you do not provide us this information we will be unable to respond.

#### **A 1.3 How Does BCH Use the Personal Data it Holds?**

To manage an your request in an efficient way and respond back to you

#### **A 1.4 What Processing of Personal Data is done?**

We create a case and add details of your query to online data stores to ensure question is efficiently managed

We establish best person to respond to question, forward questions to relevant individuals to find answer

We respond to you with answers, or advise where they may be able to get help

The basis that we are processing data is legitimate interest

#### **A 1.5 Who Does BCH Share Personal Data with?**

Depending on the nature of you query we may need to include any of the organisations supplying services to us to help answer it. We also rely on volunteers who provide services on our behalf, and they to may be involved.

#### **A 1.6 How long does BCH keep the Personal Data it Holds?**

We would generally expect to keep correspondence for up to two years. Where correspondence is deemed to be a company record it may be retained for up to seven years.

#### **A 1.7 Does BCH Transfer Personal Data Overseas?**

In general we would not expect to transfer your data overseas, unless you are involved in providing feedback or request to receive newsletters.

We use Mailchimp to send newsletters and manage surveys and feedback through SurveyMonkey. Both these organisations are based in the US. We rely on the Privacy Shield Framework to transfer this information to these organisations.

## **A 2 Attend an event**

This section describes how we process personal data when you attend any of the events which BCH runs or hosts or supports. Examples include

- classes and clubs run at our offices through one of our projects eg computer , fitness , Tai chi, choir
- social events sponsored by one of our projects held in the office eg coffee mornings, lunches
- events sponsored by one of our projects held at other venues eg cinema trips, sporting events, walkwell"

### **A 2.1 How Does BCH Obtain Personal Data**

Most is collected direct from you yourself, or from the person registering on your behalf

### **A 2.2 What Types of Personal Data Does BCH Collect and Use?**

We collect basic contact information in order that we can manage event - examples name, address, phone numbers, email address. Without this information we may not be able to contact you if there are changes in the event details.

You may choose to disclose dietary and allergy information where refreshments is being served or medical information if it impacts the delivery of the event. You do not have to provide this information, if we do not have it the event may not be as satisfactory for you.

### **A 2.3 How Does BCH Use the Personal Data it Holds?**

To invite individuals to event which may be of interest to them

To facilitate successful events and ensure that there is sufficient space for all to enjoy the event

To improve future events.

To Information provided to sponsors to encourage them to continue to sponsor BCH or as a requirement of funding.

### **A 2.4 What Processing of Personal Data is done?**

Your contact information may be used to publicise the event to you. The basis that we process this data legitimate interest as you have attended previous similar events, or contact as you have been accepted on one of our programs.

The basis that we process this data associated with the event is contract as you will be attending one of the events we host.

Registration information is used to ensure that events are appropriately run , and payment taken where necessary.

Registration on the day may be processed in the event of an incident to ensure everyone's safety.

Information provided either before or during event may be used to assess suitability of event and make adjustments to meet your requirements.

Filming and photographs will be reviewed for a may be used to publicise feedback is reviewed to improve future events we host.

We may create Anonymous information on number of individuals attending events and demographics. This is generally done on the basis of legal requirement with our sponsors."

### **A 2.5 Who Does BCH Share Personal Data with?**

Many of the classes organised by BCH at our offices are run by external companies. We have carried out a basic due diligence of these companies. The companies may require additional information before individuals are able to join classes - they have their own data protection policies which may not be the same as BCH's.

### **A 2.6 How long does BCH keep the Personal Data it Holds?**

BCH would generally expect to keep event information for up to two years.

External companies running classes have their own data protection policies which may not be the same as BCH's.

### **A 2.7 Does BCH Transfer Personal Data Overseas?**

When BCH contacts you via email to publicise events we use Mailchimp which is a US based company. Where we ask you for feedback from events we use SurveyMonkey which is a US based company. We rely on the Privacy Shield Framework to transfer this information to Mailchimp.

Organisations who are running the event may have different policies.

### **A 2.8 How Does BCH Protect the Personal Data it Holds?**

Organisations running classes We generally do not have a contract with these organisations. Each of these organisations is required to protect data under data protection legislation. Their policies may not be the same as BCH's.

Many events are supported by volunteers. Volunteers have all signed an agreement so they will protect data in the same way that BCH does, and will manage your data in the way we tell them to.

## **A 3 Subscribe to newsletters**

This section describes how we process personal data when you have requested that we send you one or more of the publications BCH creates on a regular basis

### **A 3.1 How Does BCH Obtain Personal Data**

Most is collected direct from you yourself, or from the person signing up on your behalf

### **A 3.2 What Types of Personal Data Does BCH Collect and Use?**

We collect basic contact information in order that we can send you the newsletters - examples name, address, email address. Without this information we may not be able to contact you if there are changes in the event details.

### **A 3.3 How Does BCH Use the Personal Data it Holds?**

To provide you with information about our organisation, the projects and events that we support.

### **A 3.4 What Processing of Personal Data is done?**

We load your contact details onto our computing environment and store email addresses in Mailchimp.

We use information to create a list of individuals who want to receive the relevant newsletters

We gather statistics around email opening and clicks using industry standard technologies to help us monitor and improve our newsletters.

We rely on legitimate interest and consent to provide you the newsletters. You can withdraw consent for us to send you newsletters at any time.

### **A 3.6 How long does BCH keep the Personal Data it Holds?**

Generally contact data will be kept for 7 years after individuals have stopped having a relationship with BCH

### **A 3.7 Does BCH Transfer Personal Data Overseas?**

When we send you a newsletter we use Mailchimp which is a US based company. We rely on the Privacy Shield Framework to transfer this information to Mailchimp.

## **A 4 Apply for employment**

This section describes how we process personal data when you are applying for work opportunities with BCH which could include permanent and contract roles, and also secondments, internships and volunteer roles.

### **A 4.1 How Does BCH Obtain Personal Data**

Most is collected direct from you yourself when you apply. We get some information following DBS check and following up with referees.

### **A 4.2 What Types of Personal Data Does BCH Collect and Use?**

When you apply for a role we collect:

- Basic contact information - examples name, address, phone numbers, email address
- interests and experience - may include education, qualifications, availability, why you are interested in role
- health data which may be relevant to your ability to do the role . Examples are details of physical or mental health, medication or sickness records.
- information relating to relevant criminal convictions and offences Examples are details of conviction, organisations analysis of relevance of conviction for role.
- emergency contact information - may include names, phone numbers, relationship

You do not have to share this information with us, if you do not then it may impact our ability to offer you a role with our organisation

Once we have established that you may be eligible for the role we will then contact referees : - you need to provide us with referee information - may include names, phone numbers, email address, how long known for  
complete a DBS check :- you will need to supply information providing name and address. If you do not show us the report that the DBS check generates to give us permission to look at the record online it may impact our ability to offer you a role with our organisation

### **A 4.3 How Does BCH Use the Personal Data it Holds?**

To determine your suitability for a role with our organisation and if we have a suitable role for you.

If we offer you a role we need to:

To understand if there are any safeguarding issues that need to be considered when assigning you activities

To ensure you have necessary information to complete your assigned activities

### **A 4.4 What Processing of Personal Data is done?**

We review the data you provide us to determine your suitability for a role with our organisation.

Your completed application form reviewed and uploaded to our computer systems

we will contact you to keep you updated on the progress of your application.

We require that you complete a DBS check and results are reviewed for relevant issues and risks

We will take up references

We will assess if you are suitable for a role with our organisation.

We will train you so they understand the specific role in the projects(s) and are aware of relevant BCH policies and procedures.

The basis that we process this data is contract.

### **A 4.5 Who Does BCH Share Personal Data with?**

During processing of your application data will be processed by YYY, the company we use to complete DBS checks. Link to YYY privacy notice

We will also be contacting the referees that you have provided to us to ask for a reference.

### **A 4.6 How long does BCH keep the Personal Data it Holds?**

Generally for unsuccessful candidates information will be kept for up to 2 years and for successful candidates for 7 years after they have finished working with us



## **A 5 Exercise your rights**

This section describes how we process personal data when you are making a request with respect to how we are processing your data.

### **A 5.1 How Does BCH Obtain Personal Data**

Data is collected from you when making the request, or person with the right to make a request on your behalf

### **A 5.2 What Types of Personal Data Does BCH Collect and Use?**

We collect basic contact information so we can respond to you - examples name, address, email address  
Sufficient information so that we can verify who you are and process your request. The specifics will depend on the request you are making, this could include other names you are known by, details of the information you believe to be inaccurate, online identifiers

### **A 5.3 How Does BCH Use the Personal Data it Holds?**

We are using the data in order that we can respond to your request in a timely manner

### **A 5.4 What Processing of Personal Data is done?**

When we receive a request from you which is a request to exercise your control over your data, we will set up an electronic case file containing the details of your request. This normally includes your contact details and any other information you have given us. This will also be used to store any information relevant to responding to your request.

We will review your request and determine the best way that we can respond to it.

We will contact others within our organisation to complete the necessary processing to respond to your request. Where necessary we will approach other organisations who process data for us to carry out any required processing.

Collate information to respond to SAR

Inform you of progress of the request and provide you with final result.

We will remove relevant information from the case file, but retain a log of what we did and how we responded

The basis that we process this data is legal obligation

### **A 5.5 Who Does BCH Share Personal Data with?**

The request may require that we contact organisations that process data for us. Where necessary and practicable we will also contact any third party who data has been shared with to carry out the same processing we have.

### **A 5.6 How long does BCH keep the Personal Data it Holds?**

Generally we will keep a record of your request and how we responded to it for up to two years after we have finished processing the request.

## **A 6 Communicate with us as a business**

This section describes how we process personal data when you are communicating with us as a business. We hold the names and contact details of individuals acting in their capacity as representatives of their organisations, across the business. Interactions relate to customers, suppliers, contracts, buildings management, IT services etc.

### **A 6.1 How Does BCH Obtain Personal Data**

Data is collected from you directly when you communicate with us, or may be passed to us as a result of attending meetings or being part of email correspondence which include multiple people.

### **A 6.2 What Types of Personal Data Does BCH Collect and Use?**

We collect basic contact information in order that we can respond to communication - examples name, address, phone numbers, email address. During the course of the activity further information may be disclosed

### **A 6.3 How Does BCH Use the Personal Data it Holds?**

We use the data to manage our business relationship with you and respond in an efficient and effective way.

### **A 6.4 What Processing of Personal Data is done?**

Processing will depend on the nature of the communications. Where we expect that we will have an ongoing relationship with, your contact information will be loaded into our contact management system

The basis that we process this data will vary depending on the nature of the communication, for many communications it is likely to be contract or legal obligation when dealing with customers and suppliers. Other communications are likely to be processed on the basis of legitimate interests as a business.

### **A 6.5 Who Does BCH Share Personal Data with?**

Depending on the nature of your query we may need to include any of the organisations supplying services to us to help answer it. We also rely on volunteers who provide services on our behalf, and they too may be involved.

### **A 6.6 How long does BCH keep the Personal Data it Holds?**

Generally we will keep a correspondence for up to two years. Where we deem the correspondence to form part of our business records we will keep it for 7 years.

## **A 7 Client Referrals**

This section describes how we process personal data when you have been referred by another organisation or agency.

The agency completes a referral form and submits it to BCH. The relevant team will review the referral and make a decision if BCH can take you on as a client.

### **A 7.1 How Does BCH Obtain Personal Data**

Data is collected from the agency making the referral

### **A 7.2 What Types of Personal Data Does BCH Collect and Use?**

The information we received from the referral agency will depend on the service that is being required.

Information may include :

Basic contact information - examples name, address, phone numbers, email address

requirements, situation and interests - may include why services required, support structure in home, interests, family members, hobbies, summary relevant medical information

emergency contact information - may include names, phone numbers, relationship

Description of the issues raised by referral organisation which impact taking individual on as a client, or restrictions/considerations BCH needs to make when assigning volunteers

We need this information to be able to understand we we are able to take you on as a client. You dont have to provide this information but if you dont it may impact our ability to take you on as a client.

### **A 7.3 How Does BCH Use the Personal Data it Holds?**

We use the data to determine if we are able to accept you as a client. This will depend on a number of factors including

- our sponsors criteria for providing funds to help individuals

- if we have available resources to meet the request

### **A 7.4 What Processing of Personal Data is done?**

Your completed referral form is reviewed and uploaded to our computer systems

We are likely to contact you to find any further necessary information and discuss our services

We will make a decision if we can take you on as a client.

The basis that we process this information is contract. Where we hold data about you we need your consent to hold this information.

### **A 7.5 Who Does BCH Share Personal Data with?**

We will not disclose your data to any other organisation.

Where we are not able to take you on as a client we may be able to suggest other organisations who can help. In this case we will ask your permission to forward relevant information to them.

### **A 7.6 How long does BCH keep the Personal Data it Holds?**

Generally for unsuccessful applications information will be kept for up to 2 years and for successful applications we will generally keep client data for up to 7 years after you have stopped being a client

### **A 7.7 Does BCH Transfer Personal Data Overseas?**

### **A 7.8 How Does BCH Protect the Personal Data it Holds?**





## **B Our Services**

### **B 1 Website Visitors**

This section describes how we manage personal data when visiting our website.

#### **B 1.1 How Does BCH Obtain Personal Data**

In general, you can visit this website without providing any information about yourself. If we do collect personal data through our website, we'll be upfront about this. We'll make it clear when we collect personal information and we'll explain what we intend to do with it.

When you use our website, we collect information in the following ways:

##### **Analytics**

We use a third-party service, Google Analytics, to collect standard internet log information and details of visitor behaviour patterns. This information is only processed in a way that does not identify anyone. We do not make, and do not allow Google to make, any attempt to find out the identities of those visiting our website.

##### **Cookies**

You can read more about how we use cookies on the Cookies section. We use a cookies tool on our website which relies on implied consent of users. We have aligned our use of cookies with the standard of consent required by GDPR.

This means that we are in the process of updating the tool which, by default, requires explicit opt in action by users of our website. This will apply to the non-necessary cookies. We will ensure any necessary cookies for functionality and security are marked so that they are not deleted by the tool.

##### **Search engine**

Our website search and decision notice search is powered by XXX. Search queries and results are logged anonymously to help us improve our website and search functionality. No identifiable personal information is collected by us or XXX.

##### **Security and performance**

We use a third-party web application firewall from YY to help maintain the security and performance of our website. The service checks that traffic to the site is behaving as would be expected. The service will block traffic that is not using the site as expected.

#### **B 1.2 What Types of Personal Data Does BCH Collect and Use?**

When visiting our website without identifying yourself, CoAbb collects some anonymous information including online identifiers which includes IP address.

#### **B 1.3 How Does BCH Use the Personal Data it Holds?**

This information is used to help us to improve our site's content and functionality. The legal basis we rely on to process your personal data is legitimate interests – this allows us to process personal data when its necessary for the purposes of our legitimate interests.

#### **B 1.4 What Processing of Personal Data is done?**

We analyse where, on which types of devices and how our site is used, how many visitors we receive, and where they click through to the site from; and remember you in case you re-visit our site, so we will know if you have already been served with cookie banners, surveys, or (where site content is undergoing testing) which version of the content you looked at.

#### **B 1.5 Who Does BCH Share Personal Data with?**

We use third parties in running some pieces of our business and providing some of our services. See full policy for details on how this is managed

If you have provided explicit names above may want to identify again here what data is shared Answers will depend if you share information with third parties)

To provide our security service, YYY processes site visitors' IP addresses.

#### **B 1.6 How long does BCH keep the Personal Data it Holds?**

#### **B 1.7 Does BCH Transfer Personal Data Overseas?**

Answer will depend on services used in delivering website

We do not transfer personal data outside European Economic Area.

(We rely on the Privacy Shield Framework to transfer information YYY which are located in the US. )

#### **B 1.8 How Does BCH Protect the Personal Data it Holds?**

Answer will depend if webservice does anything specific not described in general section

Example

For our website we have implemented technology that encrypts all connections to our website ensuring that your data is secure.

## **B 2 Office Visitors**

This section describes how we process personal data when you visit to our offices.

Examples

-To make sure that we can meet your requirements please contact us to arrange an appointment and agree where we will meet.

-We offer an open door policy and anyone is welcome to drop into the office during opening hours.

-We meet visitors at our office in XXX. Most visitors to our offices come with an appointment. "

#### **B 2.1 How Does BCH Obtain Personal Data**

All information is provided by you, or if you are part of a group the information may have been provided by your group leader.

We operate closed-circuit television (CCTV) operates inside/outside the building

#### **B 2.2 What Types of Personal Data Does BCH Collect and Use?**

The personal data collected includes: Name, organisation you represent, vehicle registration, time you arrive and leave

#### **B 2.3 How Does BCH Use the Personal Data it Holds?**

We ask all visitors to sign in and out at reception. This is so that we know who is in the building in case there is an emergency.

Closed-circuit television (CCTV) operates inside the building for security purposes. The information is viewed by us on during investigations

The legal basis we rely on is legitimate interests – this allows us to process personal data when its necessary for the purposes of our legitimate interests.

#### **B 2.4 What Processing of Personal Data is done?**

Information is processed to mitigate risk of an incident or in response to an incident.

Information in the visitor's book is used

- to determine who is in the building in case of emergency
- to contact your company if you get taken ill during visit
- to contact you if there is an issue with your vehicle
- To confirm that there are no unexpected visitors in building when office is locked up overnight or at weekends
- To confirm who was in the building during investigation into an incident

Information from CCTV

- Is viewed live to be aware of security and safety issue
- Is viewed after the event during investigation into a security or safety incident

### **B 2.6 How long does BCH keep the Personal Data it Holds?**

We keep CCTV images and our visitors book for 6 months.

### **B 2.8 How Does BCH Protect the Personal Data it Holds?**

The completed pages of the visitors book are removed at the end of the working day and stored in a locked filing cabinet until destroyed.

## **B 3 Service1**

### **B 3.1 How Does BCH Obtain Personal Data**

### **B 3.2 What Types of Personal Data Does BCH Collect and Use?**

### **B 3.3 How Does BCH Use the Personal Data it Holds?**

### **B 3.4 What Processing of Personal Data is done?**

### **B 3.5 Who Does BCH Share Personal Data with?**

### **B 3.6 How long does BCH keep the Personal Data it Holds?**

### **B 3.7 Does BCH Transfer Personal Data Overseas?**

### **B 3.8 How Does BCH Protect the Personal Data it Holds?**

## **B 4 Matching Volunteers and clients**



This section describes how we process personal data when we get feedback from you either as a

- Volunteer: how volunteering is going
- from clients: about service delivery or events

#### **B 4.1 How Does BCH Obtain Personal Data**

Data is collected from individuals when they signed up to be a client or volunteer.

#### **B 4.2 What Types of Personal Data Does BCH Collect and Use?**

The information that is used includes information that was provided at time of enrolment :

- Basic contact information - examples name, address, phone numbers, email address
- interests and social circumstances
- health data which may be relevant to the activities you will completed together

#### **B 4.3 How Does BCH Use the Personal Data it Holds?**

Information is used to generate the best possible match of clients and volunteers to ensure that you enjoy working with each other.

#### **B 4.4 What Processing of Personal Data is done?**

Check which volunteers are available for assignments

Agree with both Volunteer, and where appropriate client, they are willing to participate and happy with matched client/volunteer

Introduce volunteer and client and agree how they are going to work together

The basis that we do the processing is contract as we have an agreement to deliver services

#### **B 4.5 Who Does BCH Share Personal Data with?**

Discussions will be held with BCH staff and both the client and volunteer. During discussion the individuals will be given some information about the other individual that it is proposed they should be matched with.

#### **B 4.6 How long does BCH keep the Personal Data it Holds?**

Information about our clients and volunteers is kept for seven years after they stop having a relationship with us

#### **B 4.8 How Does BCH Protect the Personal Data it Holds?**

All our volunteers have signed an agreement with us to keep the data safe, and they will manage the data in the way that we tell them to.

### **B 5 Feedback**

This section describes how we process personal data when we get feedback from you either as a

- Volunteer: how volunteering is going
- from clients: about service delivery or events

#### **B 5.1 How Does BCH Obtain Personal Data**

The data used was collected from you when you signed up as a volunteer or client or signed up for an activity or event or make an enquiry

#### **B 5.2 What Types of Personal Data Does BCH Collect and Use?**

We use basic contact information to make the request for feedback.

Most feedback can be provided anonymously and we would not generally expect to collect any personal data as part of feedback.

#### **B 5.3 How Does BCH Use the Personal Data it Holds?**

To contact you to ask how we can improve our services

#### **B 5.4 What Processing of Personal Data is done?**

We create a set of questions for the feedback being requested. This could be about a specific event that we held or questions about one of our services or newsletters.

We select the relevant people to be included in the feedback requests.

Where we are going to request electronically we will send people a link to the questionnaire. Some feedback questionnaires may be handed out at or after an event. We may phone people to ask for their feedback.

Where individuals have provided contact details we will follow up.

The basis we do the processing is legitimate interests

#### **B 5.5 Who Does BCH Share Personal Data with?**

We rely on volunteers who provide services on our behalf, and they may be involved in collecting and processing feedback.

Where we use electronic surveys we use Survey Monkey to create and manage the surveys

#### **B 5.6 How long does BCH keep the Personal Data it Holds?**

Information about our clients and volunteers is kept for seven years after they stop having a relationship with us. Survey information will generally be kept for up to two years

#### **B 5.7 Does BCH Transfer Personal Data Overseas?**

Where we collect feedback electronically we use Survey Monkey. Survey Monkey is a US based company with its servers based in the US.

#### **B 5.8 How Does BCH Protect the Personal Data it Holds?**

All our volunteers have signed an agreement with us to keep the data safe, and they will manage the data in the way that we tell them to. Where we ask you for feedback from events we use SurveyMonkey which is a US based company. We rely on the Privacy Shield Framework to transfer this information to Mailchimp.

### **B 6 Additional Referrals**

This section describes how we process personal data when we refer clients to additional services from other agencies/organisations. Always done on a consent basis

#### **B 6.1 How Does BCH Obtain Personal Data**

The data used was collected from you when you signed up as a volunteer or client.

#### **B 6.2 What Types of Personal Data Does BCH Collect and Use?**

The information we use in making referrals could be any of the data we hold which could include:

Basic contact information - examples: name, address, phone numbers, email address

requirements, situation and interests - may include why services required, support structure in home, interests, family members, hobbies, summary relevant medical information

emergency contact information - may include names, phone numbers, relationship

Description of the issues raised by referral, organisation which impact taking individual on as a client, or restrictions/considerations BCH needs to make when assigning volunteers

#### **B 6.3 How Does BCH Use the Personal Data it Holds?**

Data is used to assess if there is additional support that you could be getting from other organisations that we are aware of

All relevant data will be used to assess if there are additional services from other organisations that we are aware of that may be able to support you.

#### **B 6.4 What Processing of Personal Data is done?**

We will review the data that we have an assessment.

We will discuss with you any other organisations who we feel might be able to offer you additional services to support you.

You will be asked if you would like us to refer you to another organisation for additional services.

The processing we do as an organisation is under the basis of contract. If we pass information on to another organisation this will be done on the basis of consent.

#### **B 6.5 Who Does BCH Share Personal Data with?**

Within BCH the information may be shared with volunteers who help us deliver our services.

Where you have agreed your data will be shared with other organisations who may provide you with additional services. These organisations will have their own data protection policies which may be different from BCH's.

#### **B 6.6 How long does BCH keep the Personal Data it Holds?**

Information about our clients and volunteers is kept for seven years after they stop having a relationship with us.

### **B 7 Planning an event**

This section describes how we process personal data when we when planning an event associated with one of the BCH projects. Examples include

- classes and clubs run at our offices through one of our projects eg computer , fitness , Tai chi, choir
- social events sponsored by one of our projects held in the office eg coffee mornings, lunches
- events sponsored by one of our projects held at other venues eg cinema trips, sporting events, walkwell

While many events may be hosted by BCH they may not be run by BCH.

#### **B 7.1 How Does BCH Obtain Personal Data**

Data will have be collected from other activities we will have collected information about individuals or organisations who are likely to run or be involved with events, or interested in attending them.

Having agreed to put on an event you may be required to let us know in advance you wish to attend to facilitate successful events and ensure that there is sufficient space for all to enjoy the event

#### **B 7.2 What Types of Personal Data Does BCH Collect and Use?**

We use basic contact information when organising events and anonymised information about the client base who might be interested in attending the event.

#### **B 7.3 How Does BCH Use the Personal Data it Holds?**

Information is used to contact individuals about putting on the event , To invite individuals to event which may be of interest to them

#### **B 7.4 What Processing of Personal Data is done?**

We use anonymous demographic information to decide what events would be of interest to our community of service users.

We use contact details of organisations and individuals to plan the event.

We use contact information of our service users and volunteers to publishes the event

We use preregistration information to help make the event more successful for all attendees, and may have to make slight modifications to meet specific requirements.

We use feedback from both hosts and participants to ensure that we improve future events.

We process data based on contract.

#### **B 7.5 Who Does BCH Share Personal Data with?**

Data may be shared with volunteers and other companies who run many of the classes and events on our behalf.

We have carried out a basic due diligence of these companies. The companies may require additional information before individuals are able to join classes - they have their own data protection policies which may not be the same as BCH's.

BCH may be required to share anonymous information about the attendees of events with the project sponsors.

#### **B 7.6 How long does BCH keep the Personal Data it Holds?**

BCH will retain information about events for up to two years after the event.

External companies running classe have their own data protection policies which may not be the same as BCH's.

#### **B 7.7 Does BCH Transfer Personal Data Overseas?**

External companies running classe have their own data protection policies which may not be the same as BCH's.

### **B 8 Telebefriending**

This section describes how we process personal data when we providing a telephone befriending service on a daily or weekly basis.

#### **B 8.1 How Does BCH Obtain Personal Data**

Personal data is collected at the time when you sign up for services or during previous convrsations with volenteers or members of staff.

#### **B 8.2 What Types of Personal Data Does BCH Collect and Use?**

Data that has been previous collected is used to arrange the phone calls.

Data may be disclosed during the call about things that are worrying you or you need help with.

#### **B 8.3 How Does BCH Use the Personal Data it Holds?**

Personal data is used to arrange the befriending phone calls and make them useful.

#### **B 8.4 What Processing of Personal Data is done?**

We decide which volunteer is going to call.

We provide the volunteer with a list of people to call.

The volunteer will call, and may make notes during the phone call of things raised during the call

The volunteer will feedback the results of the call, either by contacting one of the members of BCH staff or entering the data directly into one of our computer systems.

Information raised on the call may result in further activity to help solve any problems raised or alert the necessary people.

All data is uploaded to our computer systems

The basis that we are processing data is contract

#### **B 8.5 Who Does BCH Share Personal Data with?**

The calls are generally made by our volunteers.

#### **B 8.6 How long does BCH keep the Personal Data it Holds?**

Data will generally be kept for 7 years.

#### **B 8.8 How Does BCH Protect the Personal Data it Holds?**

All our volunteers have signed an agreement with us to keep the data safe, and they will manage the data in the way that we tell them to.

### **B 9 Safer Homes Assessments**

This section describes how we process personal data when visiting home to assess risks of fire, burglary, accidents with young children or draughts

#### **B 9.1 How Does BCH Obtain Personal Data**

Personal data is used to contact you to arrange visits for assessments, understand if you are eligible for a free service and make improvements to your home as agreed.

#### **B 9.2 What Types of Personal Data Does BCH Collect and Use?**

Data that has been previously collected when you signed up for the service is used to contact you. The data includes

- contact information
- whether you are receiving benefits - as this impacts if we will charge you for any suggested improvements
- circumstances which might make you eligible for the services

#### **B 9.3 How Does BCH Use the Personal Data it Holds?**

To make appointments to visit you at your home for assessments and to complete remedial work.

To assess if you are eligible for the service and any financial contributions you will need to make.

To confirm you are happy with the service you received

#### **B 9.4 What Processing of Personal Data is done?**

We use your data to

- contact you to arrange appointments for home visit to make assessment and complete any agreed improvements and get feedback on our service
- To assess if you are eligible for the service and any financial contributions you will need to make.

The basis that we process your data is contract.

#### **B 9.5 Who Does BCH Share Personal Data with?**

Data will be disclosed to the volunteer(s) and approved contractor who is asked by us to complete your home assessment and carry out remedial work.

## **B 9.6 How long does BCH keep the Personal Data it Holds?**

Data will generally be kept for 7 years.

## **B 9.8 How Does BCH Protect the Personal Data it Holds?**

All our volunteers have signed an agreement with us to keep the data safe, and they will manage the data in the way that we tell them to.

BCH uses a small number of approved contractors to carry out remedial work required at home. We have contracts with these companies to carry out the work on our behalf. The companies can only process your data in the ways that we tell them they can.

## **B 10 Care and Repair - Home Adaptions**

This section describes how we process personal data when we are working with vulnerable older people and disabled people in the local community to adapt their homes to make a better living environment.

### **B 10.1 How Does BCH Obtain Personal Data**

We normally get your personal data passed to us from an agency. The agency has recommended that you need to have adaptions made to your home but need help getting the project completed. We help you complete the project finding you companies who will do good quality work, provide feasibility assessments, help with design, and checking and follow-up. We can help you apply for a disabled facilities grant from the local authority.

### **B 10.2 What Types of Personal Data Does BCH Collect and Use?**

Data that has been passed to us includes

- contact information

We need this information in order to be able to contact you.

If you wish us to help you apply for grants then you need to share with us the necessary information which is likely to include

- information about your financial status
- information about disabilities

You do not have to share this information with us we will not be able to help you apply for grants.

### **B 10.3 How Does BCH Use the Personal Data it Holds?**

Data is used to contact you about your project to adapt your home and help you apply for grants.

### **B 10.4 What Processing of Personal Data is done?**

We will create a case file for your project on our computer systems. This file will contain all information relevant to your building project and grants that we have applied for.

Data is used to contact you

- at the start of the project to make sure that we understand your requirements
- during the project to make sure that it is running smoothly
- at the end of the project to get your feedback on how the project has gone

We will contact contractors to get estimates for the work you require to be done.

We do this processing on the basis of contract.

Where we share your contact details with contractors we get your consent to do this.

Data is used to apply for grants. As this data may include information about disabilities we need your consent to process this information and share it with the funding bodies

### **B 10.5 Who Does BCH Share Personal Data with?**

Your contact information will be shared with contractors to provide estimates for the work and then complete the work.

Where we help with grant applications the data will be shared with the funding organisation.

**B 10.6 How long does BCH keep the Personal Data it Holds?**

Data will generally be kept for 7 years.

**B 10.8 How Does BCH Protect the Personal Data it Holds?**

BCH uses a small number of approved contractors to carry out adaptations required at home. We have contracts with these companies to carry out the work on our behalf. The companies can only process your data in the ways that we tell them they can.









**End of List of Services**

**Last Updated**

July 2018