

PRIVACY STATEMENT

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Approved by the Trustees:

Signed:



(Chief Executive Officer)

Michele Jolly

Signed:



(Chair of Board of Trustees)

Carol Liggins

Copies of this document can be made available in different formats.

Call 0345 5564144 for more information.

How We Use Your Data

WHO WE ARE

We are **Age UK Lincoln & South Lincolnshire**, a Registered Charity (1078539) with Company Registration Number 3777156 at 36 Park Street, Lincoln, LN1 1UQ.

This Privacy Policy explains what we do with your personal data, whether we are in the process of introducing ourselves to you, providing information and advice, providing another service to you, receiving a service from you, employing you, dealing with you as a volunteer, or you are visiting our website.

If you have any questions about this Policy, or about how we look after your data generally, please contact dpo@ageuklsl.org.uk.

INTRODUCTION

Age UK Lincoln & South Lincolnshire ('we' or 'us' etc), is a 'controller' of data. This means that, under the UK General Data Protection Regulation (**GDPR**) and the Data Protection Act 2018 (**DPA**), we may control and process your personal data and, in certain circumstances, special categories of data (previously known as 'sensitive data').

We take privacy very seriously. We are committed to keeping your data secure and processing it fairly and lawfully. We ask that you read this policy very carefully because explains the types of information that we may collect and hold, how that information is used and with whom the data is shared. It also sets out how you can contact us if you have any queries or concerns about this information.

We reserve the right to make changes to this Policy at any time and we may notify you of changes to this policy by posting an updated version of this policy on our website. Your continued use of our services and websites that are subject to this Policy will signify your acceptance of any and all changes to this Policy made by us from time to time; you should check this page occasionally to ensure you are happy with any changes to this Policy.

PERSONAL DATA WE MAY COLLECT ABOUT YOU

Personal information means any information about you from which you can be identified, but it does not include information where your identity has been removed ('anonymous data').

As the 'controller' of personal information, we are responsible for how that data is managed. The GDPR and the DPA sets out our obligations to you and your rights in respect of how we manage your personal information.

As the 'controller' of your personal information, we will ensure that the personal information we hold about you is:

1. used lawfully, fairly and in a transparent way.
2. collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes.
3. relevant to the purposes we have told you about and limited only to those purposes.
4. accurate and kept up to date.
5. kept only as long as necessary for the purposes we have told you about.
6. kept securely.

INFORMATION COLLECTED BY US:

We may collect, use, store and transfer information about you in several different ways and this information may be classified in different categories. Please take care when submitting information to us. Only provide us with information that you are happy for us to process in accordance with this Privacy Statement, particularly with regard to confidential or sensitive information.

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.

In the course of our work, the following types of data may be collected from you:

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, delivery address, email address and telephone numbers.

Status Data includes information about why you are being referred to a specialist organisation through our pathway; this may include health data.

Financial Data includes bank account and payment card details.

Technical Data includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access this website.

Enquiry Data includes data you provided us with when you contact us with an enquiry.

Usage Data includes information about how you use our website and services, as well as the frequency and pattern of your service use.

Marketing and Communications Data includes your preferences in receiving marketing from us and our third parties and your communication preferences.

Anonymous Data includes data that may be socio-demographic (for instance information about your work or profession, nationality, education) but also includes any combination of personal information identified above, including health information, but in a format from which you cannot be identified either directly or indirectly

Special Category Data includes data regarding health conditions or data relating to protected characteristics such as race, ethnicity or sexual orientation

Criminal Offence Data includes data relating to criminal convictions and offences, for example that may be revealed during a DBS check

SOURCES OF DATA:

We may collect personal data about you when you make an enquiry with us; apply for a job; apply to volunteer; interact with our personnel; receive a service from us; you are referred to us from a third party; visit or use our website; give us feedback; or complete a form and submit it to us.

We may collect data about you from third parties and publicly available sources. For example, we may collect personal information from:

- analytics providers or search information providers
- providers of technical, legal, accountancy, payment and delivery services and other specialist agencies
- social media if you (i) interact with any of our social network pages or applications; or (ii) you use one of our services that allow interaction with social networks, we may receive information relating to your social network accounts

In particular, may collect information about you from the following sources:

1. **Information that you give to us:** either be using our website, submitting a form to us, calling us, emailing or writing to us, applying for a role with us, or by visiting our offices or other premises, etc – this may include Special Category Data
2. **Information we receive from other sources:** including other agencies providing services to you, medical professionals, our commissioning bodies such as local authorities and the NHS, HMRC, or from your friends and family and anyone holding attorney over your affairs – this may include Special Category Data
3. **Information we receive automatically:** this is mainly Technical and Anonymous Data

REASONS WE COLLECT AND USE YOUR PERSONAL INFORMATION

We rely on the following grounds within the GDPR:

- Article 6(1)(f) – to process your personal data in pursuit of **legitimate interests** (**‘Legitimate Interests’**)
- Article 6(1)(a) – processing is conducted with your **consent** to process personal data for specified purposes (**‘Consent’**)
- Article 6(1)(b) – processing is necessary for the performance of our **contracts** to provide individuals with services (**‘Contract’**)
- Article 6(1)(c) – processing is necessary for us to demonstrate compliance with our **regulatory framework** and the law (**‘Compliance’**)
- Article 6(1)(d) – processing is necessary because it is in your vital interest (**‘Vital Interests’**)

With specific regard to *Special Categories of Data*, we also rely on the condition of processing set out in Article 9(h) of the GDPR (health and social care), the basis in law of which is established under paragraph 2 of Part 1 of Schedule 1 of the DPA, being that the processing is necessary for health and social care purposes (**‘Health and Social Care’**). In particular, the processing is necessary for purposes connected with the management of a health care system or services and or social care system or services.

We will only use your personal data to the extent permitted by the law. The following table sets out the types of data we may use, the reason we may use this data and the legal basis for doing so:

Reason for Using Data	Type of Data	Legal Basis
When receiving assistance from our information and advice service	Identity, Contact, Enquiry, Special Category, Usage	Legitimate Interests, Contract
When you volunteer for us, or apply to volunteer with us	Identity, Contact, Enquiry, Status, Financial, Special Categories, Criminal Offence	Legitimate Interests, Contract
When you work for us, or apply for a job with us	Identity, Contact, Enquiry, Status, Financial, Special Categories, Criminal Offence	Legitimate Interests, Contract, Compliance
When you use our befriending service	Identity, Contact, Status, Special Category, Enquiry, Usage	Legitimate Interests, Contract
When you make a general enquiry with us	Identity, Contact, Enquiry	Legitimate Interests
When you enquire about or engage with one of our activities	Contact, Identity, Enquiry, Usage	Legitimate Interests, Contract
When we engage with you as part of the Government's COVID-19 vaccination programme	Identity, Special Category, Usage	Legitimate Interests, Vital Interests, Contract
When you enquire about or engage with our telecare service	Identity, Contact, Status, Financial, Enquiry, Special Category	Legitimate Interests, Contract
When you enquire about or engage with our warm and wise service	Identity, Contact, Status, Enquiry, Special Category	Legitimate Interests, Contract
When you enquire about or engage with our community connectors service	Identity, Contact, Status, Enquiry, Special Category	Legitimate Interests, Contract
When you enquire about or engage with our response service	Identity, Contact, Status, Enquiry, Usage, Special Category	Legitimate Interests, Vital Interests, Contract
To advise you of opportunities and advertising, including market research	Contact, Marketing and Communication	Consent

To ask for your help in volunteering or make a donation (inc. Gift Aid) or leave us a legacy	Contact, Marketing and Communication	Consent
To administer and protect our business and our website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	Technical, Usage, Anonymous	Legitimate Interests
To use data analytics to improve and enhance our service	Technical, Usage, Anonymous	Legitimate Interests
To create and manage our marketing database	Identity, Contact, Marketing and Communications	Legitimate Interests
To refer you to emergency services in case of medical or other emergency	Identify, Contact, Special Categories	Vital Interests
To report to our commissioning bodies, such as local authorities and the NHS on the performance of contracts we have with them	Usage, Anonymous	Contract, Compliance
To make a financial transaction such as raising an invoice or requesting a direct debit payment	Identity, Contact, Enquiry, Status, Financial, Special Categories	Legitimate Interests, Contract, Compliance

MARKETING AND OPTING OUT

We will not contact you for the purposes of direct marketing unless you have asked us to do so. However, if you have asked us to do so and later you change your mind, you can opt-out at any time with no hassle. To do this, just let us know. See further 'Your rights' below for details about how to contact us.

WHO HAS ACCESS TO YOUR PERSONAL INFORMATION?

We will not sell or rent your information to third parties. We will not share your information with third parties for marketing purposes. We may have to share your personal data with the third parties set out below:

Third Party Service Providers working on our behalf: We may pass your information to our third-party service providers, agents, subcontractors and other associated organisations for the purposes of completing tasks and providing services to you on our behalf. However, when we use third party service providers, we disclose only the personal information that is

necessary to deliver the service and we have a contract in place that requires them to keep your information secure and not to use it for their own direct marketing purposes.

Our website provider: to enable us and them to deliver their service to us, carry out analysis and research on demographics, interests and behaviour of our users and supporters to help us gain a better understanding of them to enable us to improve our services. This may include connecting data we receive from you on the website to data available from other sources. Your personally identifiable data will only be used where it is necessary for the analysis required, and where your interests for privacy are not deemed to outweigh their legitimate interests in developing new services for us.

Our professional advisors and agents for the purposes of advising and representing us in any matter connected with your account or your use of our website upon which we legitimately consider that advice or representation is needed.

Link Workers and Third Party Service Providers as part of a referral pathway: This may include primary care network providers, NHS partnership organisations, voluntary sector organisations, PCN managers, clinical directors, and other healthcare and social care providers.

Your General Practitioner (GP): As part of the NHS's commitment to holistic healthcare provision, information about your pathway referral is provided to your GP so they can ensure they are offering you the best support. If you would prefer for your GP not to be provided with information about your referral pathway, please discuss this with our agent.

Please be reassured that we will not release your information to third parties for them to use for their own direct marketing purposes, unless you have requested us to do so, or we are required to do so by law, for example, by a court order or for the purposes of prevention of fraud or other crime.

KEEPING YOUR DATA SECURE

We will use technical and organisational measures to safeguard your personal data, for example:

- Access to our systems is controlled by password and username which are unique to the user;
- We store your electronic personal data on secure servers;
- We keep paper records to a minimum, and destroy any temporary paper records once electronic systems have been updated. If we need to store paper records they are kept in secure environments;
- We train our staff in good records management;
- Payment details are encrypted

Non-sensitive details (your contact details and preferences for example) are transmitted normally over the Internet, and this can never be guaranteed to be 100% secure. As a result, while we strive to protect your personal information, we cannot guarantee the security of any information you transmit to us, and you do so at your own risk. Once we receive your information, we make our best effort to ensure its security on our systems. Where we have given (or where you have chosen) a password which enables you to access certain parts of our websites, you are responsible for keeping this password confidential. We ask you not to share your password with anyone.

Personal data will be stored on encrypted cloud-based systems operated by Microsoft Office, Salesforce and/or Iris.

We advise you to take great care over your personal data. Do not provide personal information about yourself or anybody else unless you are satisfied you are taking proper precautions first.

TRANSFERRING YOUR INFORMATION OUTSIDE OF EUROPE

We may store your data temporarily on our cloud service operated by Microsoft. This may include limited special categories of data. We have taken appropriate steps to satisfy ourselves that your data will be secure during this process; we have a contractual relationship with Microsoft that underpins this. As part of that security, Microsoft may store your data in one or more of its international data centres, meaning that your data may be stored temporarily outside of the European Economic Area. If you have any concerns about this, please contact us using the details below.

INFORMATION ABOUT OTHER INDIVIDUALS

If you give us information on behalf of someone else, you confirm that the other person has appointed you to act on his/her behalf and has agreed that you can:

- Give consent on his/her behalf to the processing of his or her personal data
- Receive on his/her behalf any data protection notices

HOW LONG DO WE KEEP YOUR DATA FOR?

As a general rule, we will not keep your data for any longer than is necessary to complete tasks or provide you with services. We have a separate policy setting out retention periods for specific types of data. You can ask to see this policy by writing to us, using the contact details under the “Your Rights” section below. You also have the right to ask us to delete your data in certain circumstances (sometimes known as ‘the right to be forgotten’.)

COOKIES

When you visit our website, we collect various personal information which may include your name, address, contact details, IP address, and information regarding which pages are accessed and when. For the latest information, please see our cookie compliance notice

THIRD PARTY LIABILITY

We are not liable for the actions and inactions of these third parties, and it is condition of your use of our website that you agree to the [Website Terms](#), which limit and restrict our liability in certain defined circumstances. In particular, you agree that when third parties are the controller of data (such as third-party suppliers of goods and services), then they are responsible for keeping your data safe once you have provided data to them. We have no control or responsibility over this.

Our 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.

YOUR RIGHTS

You have various rights under the GDPR, including the following rights:

- **Right to object:** If we are using your data because we deem it necessary for our legitimate interests to do so, and you do not agree, you have the right to object. We will respond to your request within 30 days (although we may be allowed to extend this period in certain cases). Generally, we will only disagree with you if certain limited conditions apply.
- **Right to withdraw consent:** Where we have obtained your consent to process your personal data for certain activities (for example, marketing), you may withdraw your consent at any time.
- **Data Subject Access Requests (DSAR):** Just so it's clear, you have the right to ask us to confirm what information we hold about you at any time, and you may ask us to modify, update or delete such information. At this point we may comply with your request or, additionally do one of the following:
 - we may ask you to verify your identity, or ask for more information about your request; and
 - where we are legally permitted to do so, we may decline your request, but we will explain why if we do so.
- **Right to erasure:** In certain situations (for example, where we have processed your data unlawfully), you have the right to request us to "erase" your personal data. We will respond to your request within 30 days (although we may be allowed to extend this period in certain cases) and will only disagree with you if certain limited conditions apply.
- **Right of data portability:** If you wish, you have the right to transfer your data from us to another data controller. We will help with this – either by directly transferring your data for you, or by providing you with a copy in a commonly used machine-readable format.
- **Right to lodge a complaint with a supervisory authority:** You also have the right to lodge a complaint with your local supervisory authority, details of which can be found below.

To exercise any of your rights concerning your information, please send an email to the following address:

DPO@ageuklsi.org.uk

Or write to us at the following postal address:

**Data Protection Officer
Age UK Lincoln & South Lincolnshire
36 Park Street
Lincoln
LN1 1UQ**

We may ask you to provide us with proof of your identity. Please do not be offended; this may occur even if we know you. It is a requirement of the GDPR in some cases.

REVIEW

This Policy was last reviewed in March 2023.

We may change this privacy policy from time to time. You should check this policy occasionally to ensure you are aware of the most recent version which will apply each time you access our website.

THE INFORMATION COMMISSIONER'S OFFICE

More information about privacy laws can be found at www.ico.org.uk

Details of your local supervisory authority: The Information Commissioner's Office. You can contact them in the following ways:

- Phone: 0303 123 1113
- Email: casework@ico.org.uk
- Live chat, via the ICO website
- Post: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF