



## PRIVACY NOTICE

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In accordance with the General Data Protection Regulation (GDPR), we have implemented this privacy notice to inform you of the types of data we process about you. We also include within this notice the reasons for processing your data, the lawful basis that permits us to process it, how long we keep your data for and your rights regarding your data.

Crossroads Care South East London are committed to protecting and respecting your privacy. We aim to be clear when we collect your data and not do anything you wouldn't reasonably expect. Developing a better understanding of our users through their personal data allows us make better decisions and ultimately helps us to reach out and meet the needs of unpaid carers.

This privacy notice explains when and why we collect personal information, people who visit our website and how we use it, the conditions under which we may disclose it to others and how we keep it secure. We may change this notice from time to time so please check the website page occasionally to ensure that you're happy with any changes. By using our website, you're agreeing to be bound by this notice. Any questions regarding this privacy notice and our privacy practices should be sent to [info@ccsel.org](mailto:info@ccsel.org) or by writing to Crossroads Care South East London, 42 Pier Road, Erith, Kent DA8 1TA. Alternatively, you can telephone 01322 336086

### A) Data Protection Principles

The data controller is required to comply with a set of core principles of good information handling.

1. Process personal data **fairly, lawfully and in a transparent manner**.
2. Obtain personal data only for one or more **specified and lawful purposes** and to ensure that such data is not processed in a manner that is incompatible with the purpose or purposes for which it was obtained.
3. Ensure that personal data is **adequate, relevant and not excessive** for the purpose or purposes for which it is held.
4. Ensure that personal data is **accurate** and, where necessary, **kept up-to-date**.
5. Ensure that personal data is not kept for any longer than is necessary for the purpose for which it was obtained.
6. Ensure that personal data is kept **secure**.
7. Ensure that personal **data is not** transferred to a country outside the European Economic Area unless the country to which it is sent ensures an adequate level of protection for the rights (in relation to the information) of the individuals to whom the personal data relates.

## **B) HOW DO WE COLLECT INFORMATION FROM YOU**

We obtain information about you when you contact us directly about our services, when we receive third party referrals, when you use our website or email us to make an enquiry, or if you ask us to send you information.

### **What type of information is collected from you?**

The type and quantity of information we collect and how we use it depends on why you are providing it.

#### **Services**

If you wish us to provide you with a service we will usually ask for:

- a) personal details such as name, address, contact details(landline/mobile phones, email address)
- b) name and contact details of your next of kin
- c) your gender, marital status, date of birth, information of any disability/ health condition you have or other medical information
- d) information on your race and religion for equality monitoring purposes
- e) banking details(if you are purchasing a service or making a donation)

If you wish us to send you information about our services we will usually ask for:

- Your name
- Your contact details(including any email address)

We will mainly use your data to:

- Provide you with services or information you asked for
- Keep a record of your relationship with us
- Ensure we know how you prefer to be contacted
- Understand how we can improve our services to you
- Ask you for information when you report a problem with our service or website.
- Administer any donations, including processing gift aid

## **C) Sensitive Personal Information**

GDPR recognises that some categories of personal information are more sensitive. Sensitive Personal Information can include information about a person's health, race, ethnic origin, political opinion, sex life, sexual orientation or religious beliefs.

We will only use this information:

- For the purposes of dealing with your enquiry and quality monitoring or evaluating the services we provide;
- We will not pass your details to anyone else without your explicit consent except in exceptional circumstances.

- Where you have given us explicit consent that you are happy for us to share your story through our publications.

If you provide us with any Sensitive Personal Information by telephone, email or other means, we will treat this with extra care and confidentiality and always in accordance with this Privacy Notice.

#### **D) HOW IS YOUR INFORMATION USED?**

We may use your information to:

- to carry out our legal obligations arising from any contracts entered into by you and us
- to undertake services commissioned by statutory organisations( i.e. local or health authority)
- seek your views or comments on the services we provide
- notify you of changes to our services
- send you information which you have requested
- undertake equal opportunities monitoring
- monitor the diversity of our clients
- process a job application
- process a donation that you have made(including Gift Aid)

We review our retention periods for personal information on a regular basis. We are legally required to hold some types of information to fulfil our statutory obligations (for example the collection of Gift Aid).

We will hold your personal information on our systems for as long as is necessary for the relevant service activity, or as long as is set out in any relevant contract you hold with us.

#### **Who has access to your 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 ensure that there are appropriate technical controls in place to protect your personal details. For example any online forms we produce are always encrypted and our network is protected and routinely monitored.

We undertake regular reviews of who has access to information that we hold to ensure that your information is only accessible by appropriately trained staff, volunteers and host contractors.

#### **Third Party Providers we work in association with:**

We work closely with various third party providers including local authorities, clinical commissioning groups and other voluntary sector providers. When you enquire about our

services they may share your information with us (with your permission) which we will use in accordance with this Privacy notice.

### **Under 13**

We are committed to protect the privacy of children under 13. If you are aged under 13 please get your parent/guardian's permission beforehand whenever you provide us with personal information.

### **What is our legal basis for processing your personal data?**

In some cases, we will only use your personal information where we have your consent or because we need to use it in order to fulfil a contract with you.

However, there are other lawful reasons that allow us to process your personal information and one of those is called 'legitimate interests'. This means that the reason that we are processing information is because there is a legitimate interest for Crossroads to process your information to help us deliver a range of services to people with a range of conditions and their carers.

### ***Legal Disclosure***

We may have to disclose your personal information if 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.

### **Disclosure & Protection of your Information**

We take looking after your information very seriously. Information you provide to Crossroads Care South East London will be held on our computers and will only be accessed by or given to our staff who have appropriate authorisation.

We have in place administrative, technical and physical measures internally designed to guard against and minimise the risk of loss, misuse or unauthorized processing or disclosure of the personal information we hold.

### **What are your rights?**

You have various rights in relation to your personal information, although those rights will not apply in all cases or to all information, we hold about you. We will tell you if this is the case when you contact us to exercise any of these rights.

You have the right to ***request*** that we:

- Provide you with a copy of your personal information that we hold about you, along with what information we use, why we use it, who we share it with, how long we keep it for and whether it has been used for automated decision making. You can make a request free of charge. Please make all requests in writing, and provide us with evidence of your identity;
- Update your personal information where it is out-of-date or incorrect;
- Delete personal information that we hold where it is no longer necessary for us to use it, or we have no lawful basis for keeping it;

- Restrict the way in which we process your information where you have asked for it to be erased or where you have objected to our use of it;
- Consider any valid objections to our processing of your personal information. Please contact us providing details of your objection.
- Provide you or a third party with some of the personal information that we hold about you in a structured, commonly used, electronic form, so it can be easily transferred
- Make no automated decision making that will create legal effects or have a similar significant impact on you, unless you have given us your consent, it is necessary for a contract between you and us or is otherwise permitted by law.
- You also have certain rights to challenge decisions made about you. **We do not carry out any automated decision-making.**

### **Your choices**

You have a choice about whether or not you wish to receive information from us. If you do not want to receive any communications from us about the work we do with carers then you can inform us by contacting: [info@ccsel.org](mailto:info@ccsel.org) or telephone 01322 336086. You can change your preferences at any time by contacting us: [info@ccsel.org](mailto:info@ccsel.org) or telephone 01322 336086

## **E) DATA PROTECTION COMPLIANCE**

Our appointed data controller is:

Darren Tobin  
Pier Road Centre, 42 Pier Road, Erith Kent DA8 1TA  
01322 336086  
07540 992898  
[d.tobin@ccsel.org](mailto:d.tobin@ccsel.org)

### **Security precautions in place to protect the loss, misuse or alteration of your information**

When you give us personal information, we take steps to ensure that it's treated securely. Any sensitive information is encrypted and protected. Non-sensitive details (your email address etc.) are transmitted normally over the Internet, and this can never be guaranteed to be 100% secure. As a result, whilst 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.

### **Links to other websites**

Our website may contain links to other websites run by other organisations. This privacy notice applies only to our website, so we encourage you to read the privacy statements on the other websites you visit.

We cannot be responsible for the privacy notices and practices of other sites even if you access them using links from our website. In addition, if you linked to our website from a third party site, we cannot be responsible for the privacy policies and practices of the owners and operators of that third party site and recommend that you check the policy of that third party site. We use cookies (small text files stored on your computer) to ensure you get the best experience from our website. More information on cookies can be found at [www.aboutcookies.org](http://www.aboutcookies.org) or the Information Commissioner's website. Full details of the cookies we use are below:

### **Content Management System**

The system we use to create webpages relies on cookies to work. These cookies store no personal data and only facilitate the operation of our website. Without them, this site would not function.

### **Measuring our visitors**

We use a system called Google Analytics to get an impression of how visitors move through our website. This system uses cookies to log what pages visitors look at and at what time.

No personal information is attached to these cookies and there is no way for us to identify individual visitors from these.

What this does allow us to do however, is see how visitors navigate within our website and determine which features they use most often. This allows us to create content that is of interest to you.

## **F) MAKING A COMPLAINT**

If you are unhappy with the way in which your personal data has been processed you may in the first instance contact us using the details provided.

If you remain dissatisfied with the outcome of your complaint then you have the right to apply directly to the Information Commissioner for a decision. The Information Commissioner can be contacted at:

Information Commissioner's Office  
Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF  
Telephone on 0303 123 1113 (local rate) or 01625 545 745.