



PRIVACY NOTICE

1. Data Protection Principles

Witton Lodge Community Association is committed to processing data in accordance with its responsibilities under the GDPR (the EU General Data Protection Regulation) and Data Protection Act 2018 (DPA) and will comply with Article 5 of the GDPR which requires that personal data shall: -

- Be processed fairly, lawfully and transparently;
- Be collected and processed only for specified, explicit and legitimate purposes;
- Be adequate, relevant and limited to what is necessary for the purposes for which it is processed;
- Be accurate and kept up to date. Any inaccurate data must be deleted or rectified without delay;
- Not be kept for longer than is necessary for the purposes for which it is processed;
- Be processed securely.

2. General Information

- a) This Privacy Notice applies to all personal data processed by Witton Lodge Community Association in relation to service users, volunteers and applicants for employment. Employee data is covered by a separate policy.
- b) Witton Lodge Community Association is registered with the Information Commissioner's Office as an organisation that processes personal data.

3. What data we process on you and our legal reason for processing

a) Service Users

Witton Lodge Community Association retains and uses personal data (information that relates to and identifies living people) in order to deliver housing, employment and other services to our service users. We process personal data on service users when you give us your consent or because it is in our legitimate interests to do so in providing our service to you or because we have a contract with you or because of our legal obligation, depending on which services you access, including the following personal information:

- Name
- Contact details, including address, telephone number and email address
- Date of Birth
- Employment history
- Housing history
- Right to work details
- Information about your criminal offences
- Other personal details relevant to the service which you are accessing

When we process information about your criminal offences we shall also comply with the additional rules and safeguards set out in the DPA.

We also process the following “special” personal data on service users when you give us your consent or if this is necessary to protect your vital interests or those of another individual who is legally or physically incapable of giving us their consent:

- Information about your health
- Information about your racial or ethnic origin
- Information about your sex life or sexual orientation
- Information about your religious beliefs or beliefs of a similar nature

b) Job Applicants and Volunteers

When individuals apply to us for work or to be a trustee or a volunteer we will only use the information they supply to us to process their application and to monitor recruitment statistics. We will collect this information because of our legitimate interests and also (if you are applying to be an employee) because if your application is successful we may enter into an employment contract with you. We may also collect special data (for example health data) but only where applicants consent to this or (in the case of an employee application) in order to carry out our obligations under employment law.

Where we want to disclose information to a third-party, for example where we want to take up a reference or carry out a Disclosure and Barring Service Check, we will not do so without informing applicants beforehand.

4. Data Sharing

- a) Witton Lodge Community Association will not share the personal data you provide us with to third parties for marketing purposes. We shall always ask for your consent before passing your personal data to third parties for other purposes, for example to provide other services or to report to our funders, unless this is allowed by law.

5. How long will we keep your information?

We will keep your personal data for the following time periods:

- a) To ensure that personal data is kept for no longer than necessary, Witton Lodge Community Association shall put in place an archiving and retention policy for each area in which personal data is processed.
- b) The archiving and retention policy shall consider what data should/must be retained, for how long, and why.
- c) The archiving and retention policy shall be reviewed at least every 3 years.

Personal Information about unsuccessful candidates for employment will be held for 6 months after the recruitment exercise has been completed; it will then be destroyed or deleted.

We will keep information on volunteers and trustees while they are volunteering for us and for a period of 1 year after this end. A summary of their volunteering will be kept for a period of 1 year after their volunteering ends in case they ask us to provide a reference for them during this period.

6. Security

- a) We will do all we can to keep your data safe and secure.
- b) We shall ensure that personal data is stored securely using modern software that is kept up-to-date.
- c) Access to personal data shall be limited to personnel who need access and appropriate security shall be in place to avoid unauthorised sharing of information.
- d) When personal data is deleted this will be done safely so that the data is irrecoverable
- e) Appropriate back-up and disaster recovery solutions shall be in place.

7. Your Rights

- a) You have the right to withdraw your consent to our processing your data by emailing: Kay.Blundell@wittonlodge.org.uk or calling 0121 382 1930.
- b) You have the right to see the personal data we hold on you and to receive a copy of your personal data. You also have the right to transfer your personal data to another data controller. You can request this via the contact details at the bottom of this notice.
- c) If you know that we are holding your personal data and believe that it may be wrong, or if you want it to be deleted or for us to stop using it, you have a right to request that it can be deleted or amended. Please do so by the contact details at the bottom of this notice.
- d) If you have any queries or complaints about how we process your personal data please contact Kay.Blundell@wittonlodge.org.uk or by calling 0121 382 1930 or contact Afzal Hussain our Chief Officer who is also our Data Protection Manager, at [insert contact details]. If you then still feel that we have not met our responsibilities under data protection legislation, you can contact the Information Commissioner's Office (ICO) at www.ico.org.uk or on **0303 123 1113**.