

Living Well Bromley

Guest GDPR Data Privacy Notice

1. Introduction

- 1.1 The notice at appendix A is a shortened version of Living Well Bromley's *Data Protection Statement* as it applies to guests, with some reference to our *Confidentiality Policy*.
- 1.2 It is issued to all guests when they first register with Living Well. Their consent to us holding their personal data is indicated by their signature on the registration form.
- 1.3 Their registration form is held in a scanned document and the personal data giving on that form is entered on our system and used on a need-to-know basis.

2. Review

- 2.1 This document will be reviewed by the Trustees alongside the *Confidentiality Policy* and *Data Protection Statement*.
- 2.2 This policy and procedure will be reviewed by the Trustees nine months after initially being adopted and thereafter every two years.
- 2.3 We will review this policy and procedure to address legislative, regulatory, best practice or operational issues.

Date adopted: 27 September 2019

Last reviewed: 27 September 2019

Next review: March 2020

DATA PRIVACY NOTICE FOR GUESTS

Living Well Bromley (registered charity no 1157385)

Personal data – what is it?

Personal data relates to a living individual who can be identified from that data. Identification can be by the information alone or in conjunction with any other information in the data controller's possession or likely to come into such possession. The processing of personal data is governed by the General Data Protection Regulation 2016/679 (the "GDPR")¹.

Who are we?

Living Well Bromley is the data controller (contact details below). This means we decide how your personal data is processed and for what purposes.

Why do we collect personal data about you?

We do this to give advice, information and support and to enable us to provide other services. We also gather some personal data to help us understand how to improve our services, to resource our work and to promote our legitimate interests as a charity.

How do we process your personal data?

Information is recorded in electronic files and cloud-based case management systems, and a small amount in paper files. In line with the advice we give, some of this personal data is sensitive, relating to health, finances, social welfare, employment, protected characteristics and other circumstances.

What am I agreeing to?

That we can hold and use your personal data for the following purposes:

- To provide care and support, including our advocacy service
- To keep in touch with guests, volunteers, staff and supporters about advocacy cases and Living Well news, events and activities
- To help fundraise and promote the interests of Living Well
- To help us to be inclusive of the whole community
- To organise employees and volunteers as part of Living Well's activities
- To maintain our own accounts and records
- To assist Living Well to gain or retain quality accreditation from third party organisations

The legal basis for processing your personal data?

- Your consent to process personal data for the purposes above
- Our legitimate interests as a charity providing advice, information and support services and the legitimate interests of our guests
- The contracts and funding agreements we may have with other bodies where we have a contractual agreement to share personal data of people using a particular advice or support service
- Our legal obligations, including those related to social security regulations and social welfare law, terrorism and money laundering

Sharing your personal data

Other than sharing information within Living Well Bromley on a need-to-know basis, we will only share your personal data with third parties when we have your explicit consent, except:

when it is believed that a you could cause danger to yourself or to others

when we suspect abuse or have knowledge of abuse

if disclosure is required by law, for example, our legal obligations to prevent terrorism and money laundering

in a life or death situation where we need to protect your vital interests or the vital interests of a third party.

where we judge that sharing personal information is justified for the prevention of serious crime

How long do we keep your personal data?

Incident book records will be kept permanently. Your general personal data as a guest, including any records relating to advocacy cases, will be stored for at least six years – it may be longer if you are still using our services – after which we will remove any information that can be used to identify you personally (names, contact information etc).

Your rights and your personal data

Unless subject to an exemption under the GDPR, you have the following rights with respect to your personal data:

- to request a copy of your personal data we hold
- to request that we correct any personal data if it is inaccurate or out of date
- to request your personal data is erased where it is no longer necessary for Living Well Bromley to hold it
- to withdraw your consent to the processing at any time
- to request that data you have given us is provided to you as a data file
- to request a restriction is placed on further processing
- to object to the processing of personal data, (where applicable)
- to lodge a complaint with the Information Commissioner's Office.

Further processing

If we wish to use your personal data for a new purpose, not covered by this Data Protection Notice, then we will provide you with a new notice explaining this new use prior to commencing the processing and setting out the relevant purposes and processing conditions. Where and whenever necessary, we will seek your prior consent to the new processing.

Confidentiality Policy and Data Protection Statement

If you ask us, we will provide you with a copy of our full Confidentiality Policy or our Data Protection Statement.

Contact Details

To exercise all relevant rights, or for queries or complaints please in the first instance contact our administrator: hello@livingwell.

You can contact the Information Commissioners Office on 0303 123 1113 or via email on their website <https://ico.org.uk/global/contact-us/email/> or at the Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire. SK9 5AF.