

## Document title:

# GDPR Privacy notice for Sight Advice South Lakes Service Users (UK).

## What is the purpose of this document?

Sight Advice South Lakes is committed to protecting the privacy and security of your personal information.

This privacy notice describes how we collect and use personal information about you in accordance with the General Data Protection Regulation (GDPR).

It applies to all people who use our services.

Sight Advice South Lakes is a "data controller". This means that we are responsible for deciding how we hold and use personal information about you. We are required under data protection legislation to notify you of the information contained in this privacy notice.

This notice applies to service users. This notice does not form part of any contract to provide services. We may update this notice at any time.

It is important that you read this notice, together with any other privacy notice we may provide on specific occasions when we are collecting or processing personal information about you, so that you are aware of how and why we are using such information.

## Data protection principles.

We will comply with data protection law. This says that the personal information we hold about you must be:

1. Used lawfully, fairly and in a transparent way.
2. Collected only for valid purposes which we have clearly explained to you and not used in any way that does not match 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 is necessary for the purposes we have told you about.
6. Kept securely.

## **The kind of information we hold about you.**

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

There are "special categories" of more sensitive personal data which require a higher level of protection.

We will collect, store, and use the following categories of personal information about you that you have provided to SASL, in order that we can offer you our services:

- Personal contact details such as name, title, addresses, telephone numbers, and personal email addresses.
- Date of birth.
- Case notes describing the SASL services provided to you
- Gender.
- Next of kin and emergency contact information.
- Date you contacted SASL
- Your CV or similar documents if SASL is providing support to develop these
- Training you may have participated in through SASL
- Photographs (if you attend SASL events)
- Details of events you have attended or in which you have expressed an interest

We may also collect, store and use the following "special categories" of more sensitive personal information:

- Information about your health, including any medical condition, health records, and details of your GP.
- If we are informed that you are a vulnerable adult, this will be noted.

## **How is your personal information collected?**

We collect personal information about service users when you contact SASL, either directly or sometimes through another agency, an employee or volunteer.

We will collect additional personal information while providing services to you.

## **How we will use information about you.**

We will only use your personal information when the law allows us to. Most commonly, we will use your personal information in the following circumstances:

1. Where we need to provide agreed services to you.
2. Where we need to comply with a legal obligation.
3. Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.

We may also use your personal information in the following situations, which are likely to be rare:

1. Where we need to protect your interests (or someone else's interests).
2. Where it is needed in the public interest or for official purposes.

## **Situations in which we will use your personal information.**

We need all the categories of information in the list above primarily to allow us to provide services to you. In some cases, we may use your personal information to pursue legitimate interests of our own, provided your interests and fundamental rights do not override those interests. The situations in which we will process your personal information are listed below. We have indicated the purpose or purposes for which we are processing or will process your personal information, as well as indicating which categories of data are involved.

- To enable us to contact you, and if necessary, your emergency contact or next of kin.
- To provide you with services that you have requested from SASL
- To keep you informed and connected with SASL activities through direct contact or by newsletter.

- To match your needs and interests with appropriate employees, volunteers or SASL events.
- To conduct studies involving data analysis to support our fund-raising efforts and grant applications. In this case your information would be anonymised.

Some of the above grounds for processing will overlap and there may be several grounds which justify our use of your personal information.

### **If you do not provide personal information.**

If you do not provide certain information when requested, we may not be able to provide services to you, or we may be prevented from complying with our legal obligations (such as to ensure the health and safety of our workers).

### **Change of purpose.**

We will only use your personal information for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If we need to use your personal information for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal information without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

### **How we use particularly sensitive personal information.**

"Special categories" of particularly sensitive personal information require higher levels of protection. We need to have further justification for collecting, storing and using this type of personal information. We may process special categories of personal information where you have provided it to us.

We will use your particularly sensitive personal information in the following ways:

- We will use information about your physical or mental health, or disability status, to ensure that we provide services that are appropriate to your needs.

## **Do we need your consent?**

Yes, we do need your consent if we use special categories of your personal information for any activity other than providing our service to you. In limited circumstances, we may approach you for your written consent to allow us to process certain particularly sensitive data. If we do so, we will provide you with full details of the information that we would like and the reason we need it, so that you can carefully consider whether you wish to consent.

## **Automated decision-making.**

Automated decision-making takes place when an electronic system uses personal information to take a decision without human intervention. We may use automated decision-making in the following circumstances:

1. Where we have notified you of the decision and given you 21 days to request a reconsideration.
2. Where it is necessary to provide services to you and appropriate measures are in place to safeguard your rights.
3. In limited circumstances, with your explicit written consent and where appropriate measures are in place to safeguard your rights.

If we make an automated decision based on any particularly sensitive personal information, we must have either your explicit written consent or it must be justified in the public interest, and we must also put in place appropriate measures to safeguard your rights.

**We do not envisage that any decisions will be taken about you using automated means, however we will notify you in writing if this position changes.**

## **Data sharing.**

We may have to share your data with third parties, including a third-party service.

We require third parties to respect the security of your data and to treat it in accordance with the law.

We may transfer your personal information outside the EU. If we do, you can expect a similar degree of protection in respect of your personal information.

We do not envisage that any data about you will be shared outside of the EU. However, we will notify you in writing if this position changes.

### **Why might you share my personal information with third parties?**

We will share your personal information with third parties where required by law, or where we have another legitimate interest in doing so.

### **Which third-party service providers process my personal information?**

"Third parties" includes third-party service providers (including contractors and designated agents). Your data is held on a database managed by Compass in Cumbria. Only employees of SASL have access to, or process, your information.

### **How secure is my information with third-party service providers and other bodies in our group?**

All our third-party service providers are required to take appropriate security measures to protect your personal information in line with our policies. We do not allow our third-party service providers to use your personal data for their own purposes. We only permit them to process your personal data for specified purposes and in accordance with our instructions.

### **When might you share my personal information with other bodies in the group?**

As at April 2018 we are not a subsidiary of a larger group. Therefore, we will **not** share your personal information with other parties in a group. You will be informed if this changes in the future and if your data is to be shared within a group/larger organisation as part of regular reporting activities on organisation performance, in the context of a reorganisation or restructuring exercise, for system maintenance support and the hosting of data.

### **What about other third parties?**

We may share your personal information with other third parties, for example to support our fund-raising and grant applications. In such circumstances, your information would usually be anonymised.

Occasionally, we may approach you for your written consent to allow us to use your personal information in case studies. If we do so, we will provide you with full details of the information that we would like and the

reason we need it, so that you can carefully consider whether you wish to consent.

We may also need to share your personal information with a regulator or to otherwise comply with the law.

### **Transferring information outside the EU.**

We will **not** transfer the personal information we collect about you to the outside the EU to provide services to you. (There is an adequacy decision by the European Commission in respect of the EU. This means that the countries to which we transfer your data are deemed to provide an adequate level of protection for your personal information).

### **Data security.**

We have put in place measures to protect the security of your information. Details of these measures are available upon request or in the Privacy Policy.

Third parties will only process your personal information on our instructions and where they have agreed to treat the information confidentially and to keep it secure.

We have put in place appropriate security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal information to those employees, volunteers, agents, contractors and other third parties who have a need to know. They will only process your personal information on our instructions and they are subject to a duty of confidentiality. Details of these measures may be obtained from the Service Manager.

We have put in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so.

### **Data retention.**

#### **How long will you keep my information for?**

We will keep your personal information for as long as necessary to fulfil the purposes we collected it for. This will include for the purposes of providing you with our services, satisfying any funding, legal, accounting, or reporting requirements. In practice, service user details are usually

retained indefinitely as the vision of individuals can deteriorate over time and your needs and the support you require may therefore change over a prolonged period.

If you are no longer a service user of SASL we may anonymise your personal information so that it can no longer be associated with you. In this case, we may use such information without further notice to you.

## **Rights of access, correction, erasure, and restriction.**

### **Your duty to inform us of changes.**

It is important that the personal information we hold about you is accurate and current. Please keep us informed if your personal information changes while you are a service user.

### **Your rights in connection with personal information.**

Under certain circumstances, by law you have the right to:

- **Request access** to your personal information (commonly known as a "data subject access request"). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.
- **Request correction** of the personal information that we hold about you. This means that you can have any incomplete or inaccurate information we hold about you corrected.
- **Request erasure** of your personal information. This means you can ask us to delete or remove personal information where there is no good reason for us continuing to use it. You also have the right to ask us to delete or remove your personal information where you have exercised your right to object to processing (see below).
- **Object to processing** of your personal information where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to our use of it on this ground. You also have the right to object if we were to process your personal information for direct marketing purposes.
- **Request the restriction of processing** of your personal information. This enables you to ask us to suspend the processing of



personal information about you; for example, if you want us to check its accuracy or the reason for processing it.

- **Request the transfer** of your personal information to another party.

If you want to review, verify, correct or request removal of your personal information, object to the processing of your personal data, or request that we transfer a copy of your personal information to another party, please contact the Service Manager in writing.

### **No fee usually required.**

You will not have to pay a fee to access your personal information (or to exercise any of the other rights). However, we may charge a reasonable fee if your request for access is clearly unfounded or excessive. Alternatively, we may refuse to comply with the request in such circumstances.

### **What we may need from you.**

We may need to request specific information from you to help us confirm your identity and ensure your right to access the information (or to exercise any of your other rights). This is another appropriate security measure to ensure that personal information is not disclosed to any person who has no right to receive it.

### **Right to withdraw consent.**

Where you may have provided your consent to the collection, processing and transfer of your personal information for a specific purpose, you have the right to withdraw your consent for that specific use at any time. To withdraw your consent, please contact the Service Manager. Once we have received notification that you have withdrawn your consent, we will no longer process your information for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so in law.

### **Data protection officer.**

We have appointed the Service Manager as Data Protection Officer (DPO) to oversee compliance with this privacy notice. If you have any questions about this privacy notice or how we handle your personal information, please contact the Service Manager. You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues.

## Changes to this privacy notice

We reserve the right to update this privacy notice at any time, and we will provide you with a new privacy notice when we make any substantial updates. We may also notify you in other ways from time to time about the processing of your personal information.

**If you have any questions about this privacy notice, please contact the Service Manager, Sight Advice South Lakes, 116 Highgate, Kendal, Cumbria, LA9 7HE**

I, \_\_\_\_\_, acknowledge that on \_\_\_\_\_, I received a copy of Sight Advice South Lakes's Privacy Notice for Service Users and that I have read and understood it.

I confirm that:

I would like to receive the SASL newsletter and other general communications regarding SASL and its services, such as fundraising and events

**Signature** \_\_\_\_\_