

How We Use Your Information - Privacy Notice for Associates

Associate Privacy Notice

INTRODUCTION

This notice is to help you understand how and why we collect personal information about you and what we do with that information. It also explains the decisions that you can make about your own information.

If you have any questions about this notice please contact the Mr G Watson.

WHAT IS PERSONAL INFORMATION?

Personal information is information that identifies you as an individual and relates to you.

This includes your contact details, next of kin and financial information. We may also hold information such as your religion or ethnic group. CCTV, photos and video recordings of you are also personal information.

HOW AND WHY DOES THE FOUNDATION COLLECT AND USE PERSONAL INFORMATION?

We set out below examples of the different ways in which we use personal information and where this personal information comes from. The Foundation's primary reason for using your personal information is to provide services to you.

- We obtain information about you from admissions and data collection forms and from other organisations you may have been working with.
- We may also get information from professionals such as doctors and from local authorities.
- We may have information about any family circumstances which might affect your welfare or happiness
- We may use car details (about those who use our car parking facilities)
- We may need information about any court orders or criminal petitions which relate to you. This is so that we can safeguard the welfare and wellbeing of you and the other associates at the Foundation.
- We use CCTV to make sure the Foundation site is safe. CCTV is not used in private areas such as toilets.
- We may take photographs or videos of you at Foundation events to use on social media and on the Foundation website. This is to show prospective associates and students what we do here and to advertise the Foundation. We may continue to use these photographs and videos after you have left the Foundation.
- We may send you information to keep you up to date with what is happening at the Foundation. For example, by sending you information about events and activities taking place (including fundraising events) and the Foundation newsletter.
- The Foundation will use the contact details of associates, alumni and other members of the Foundation community to keep them updated about the activities of the Foundation, including by sending updates and newsletters, by email and by post. Unless the relevant individual objects, the Foundation may also:
 - Contact associates and/or alumni by post and email in order to promote and raise funds for the Foundation;
 - Collect information from publicly available sources about associates' and former students' activities, in order to maximise the Foundation's fundraising potential and to ensure that the Foundation can invite associates and former students to events relevant to their circumstances;
 - Should you wish to limit or object to any such use, or would like further information about them, please contact the Mr G Watson in writing

- We may use information about you if we need this for historical research purposes or for statistical purposes.

SHARING PERSONAL INFORMATION WITH THIRD PARTIES

- In accordance with our legal obligations, we may share information with local authorities, the Care Quality Commission and the Department for Health, for example, where we have any safeguarding concerns.
- On occasion, we may need to share information with the police.
- We may also need to share information with our legal advisers for the purpose of obtaining legal advice
- Occasionally we may use consultants, experts and other advisors to assist the Foundation in fulfilling its obligations and to help run the Foundation properly. We might need to share your information with them if this is relevant to their work.
- We may share some information with our insurance company, for example, where there is a serious incident at the Foundation.
- If you leave us to attend another Care provider we may need to provide that provider with information about you. For example, details of family circumstances.
- We may need to share information if there is an emergency, for example, if you are hurt whilst on Foundation premises.
- We sometimes use contractors to handle personal information on our behalf. The following are examples:
 - IT consultants who might access information about you when checking the security of our IT network; and
 - We use third party "cloud computing" services to store some information rather than the information being stored on hard drives located on the Foundation site.

OUR LEGAL GROUNDS FOR USING YOUR INFORMATION

This section contains information about the legal basis that we are relying on when handling your information.

Legitimate interests

This means that the processing is necessary for legitimate interests except where the processing is unfair to you. The Foundation relies on legitimate interests for most of the ways in which it uses your information.

Specifically, the Foundation has a legitimate interest in:

- Providing services to you;
- Safeguarding and promoting the welfare of you and other associates;
- Promoting the objects and interests of the Foundation. This includes fundraising;
- Facilitating the efficient operation of the Foundation; and
- Ensuring that all relevant legal obligations of the Foundation are complied with.

In addition, your personal information may be processed for the legitimate interests of others. For example, if you applied to another care provider they will have a legitimate interest in knowing if we have safeguarding concerns about you.

If you object to us using your information where we are relying on our legitimate interests as explained above please contact Mr G Watson.

Necessary for a contract

We will need to use your information in order to perform our obligations under our contract with you.

Legal obligation

Where the Foundation needs to use your information in order to comply with a legal obligation, for example to report a concern to Social Services. We may also have to disclose your information to third parties such as the courts, the local authority or the police where legally obliged to do so.

Vital interests

For example, to prevent someone from being seriously harmed or killed.

Public interest

The Foundation considers that it is acting in the public interest when providing our services.

The Foundation must also comply with an **additional condition** where it processes special categories of personal information. These special categories are as follows: personal information revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic information, biometric information, health information, and information about sex life or orientation.

Substantial public interest

The processing is necessary for reasons of substantial public interest.

Vital interests:

To protect the vital interests of any person where that person cannot give consent, for example, if they are seriously hurt and are unconscious.

Legal claims:

The processing is necessary for the establishment, exercise or defence of legal claims. This allows us to share information with our legal advisors and insurers.

Medical purposes

This includes medical treatment and the management of healthcare services.

We may ask for your consent to use your information in certain ways. If we ask for your consent to use your personal information you can take back this consent at any time. Any use of your information before you withdraw your consent remains valid. Please contact Mr G Watson if you would like to withdraw any consent given.

SENDING INFORMATION TO OTHER COUNTRIES

We may send your information to countries which do not have the same level of protection for personal information as there is the UK. For example, we may:

- Store your information on cloud computer storage based overseas; or
- Communicate with you by email when you are overseas (for example, when you are on holiday).

The European Commission has produced a list of countries which have adequate data protection rules. The list can be found here: http://ec.europa.eu/justice/data-protection/international-transfers/adequacy/index_en.htm

If the country that we are sending your information to is not on the list or, is not a country within the EEA (which means the European Union, Liechtenstein, Norway and Iceland) then, it might not have the same level of protection for personal information as there is the UK.

We will provide you with details about the safeguards which we have in place outside of this privacy notice. If you have any questions about the safeguards that are in place please contact Mr G Watson.

FOR HOW LONG DO WE KEEP YOUR INFORMATION?

We keep your information for as long as we need to in order to provide our services to you. We will keep some information after you have left the Foundation, for example, so that we can find out what happened if you make a complaint.

In exceptional circumstances, we may keep your information for a longer time than usual but we would only do so if we had a good reason and only if we are allowed to do so under data protection law.

We can keep information about you for a very long time or even indefinitely if we need this for historical, research or statistical purposes. For example, if we consider the information might be useful if someone wanted to write a book about the Foundation.

WHAT DECISIONS CAN YOU MAKE ABOUT YOUR INFORMATION?

From May 2018 data protection legislation gives you a number of rights regarding your information. Some of these are new rights whilst others build on your existing rights. Your rights are as follows:

- if information is incorrect you can ask us to correct it
- You can also ask what information we hold about you and be provided with a copy. We will also give you extra information, such as why we use this information about you, where it came from and what types of people we have sent it to
- You can ask us to delete the information that we hold about you in certain circumstances. For example, where we no longer need the information
- You can ask us to send you, or another organisation, certain types of information about you in a format that can be read by computer
- Our use of information about you may be restricted in some cases. For example, if you tell us that the information is inaccurate we can only use it for limited purposes while we check its accuracy

Mr G Watson can give you more information about your data protection rights.

FURTHER INFORMATION AND GUIDANCE

Mr G Watson is the person responsible at the Foundation for managing, on a day to day basis, how we look after personal information and deciding how it is shared.

Like other organisations we need to keep your information safe, up to date, only use it for what we said we would, destroy it when we no longer need it and most importantly - treat the information we get fairly.

This notice is to explain how we use your personal information. Mr G Watson can answer any questions which you may have.

Please speak to Mr G Watson if:

- You object to us using your information for marketing purposes e.g. to send you information about Foundation events. We will stop using your information for marketing purposes if you tell us not to; or
- You would like us to update the information we hold about you; or
- You would prefer that certain information is kept confidential.

If you consider that we have not acted properly when using your personal information you can contact the Information Commissioner's Office - ico.org.uk.