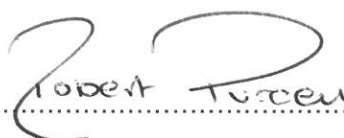


Privacy Policy

Date of Review: November 2018

Date of Next Review: November 2019

Chief Executive Officer's Signature:

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ACCURO (CARE SERVICES)

Privacy Policy

Privacy Policy

The registered office for Accuro (Care Services) is: Tocher House, Start Hill, Near Bishop's Stortford, Essex. CM22 7TA

Accuro (Care Services) is the data controller in respect of all personal data collected in relation to our services and activities.

Data controllers are legally responsible for ensuring that personal data they obtain is processed in full compliance with the Data Protection Act 1998 (General Data Protection Regulation).

This Privacy Policy explains what personal data we may collect about you, how we use it, and the steps we take to ensure that it is kept secure. We also explain your rights and how to contact us.

By giving personal data to us, you indicate that you consent to us using your personal data in accordance with this Privacy Policy.

1. The Personal Data We Collect And Its Sources

We may obtain personal data face to face, electronically, on paper (such as any form you complete – including any online form) or verbally (such as during any telephone conversations we have with you).

The information may come to us:

- Directly from you such as when you make an enquiry, register on or use our website, sign up for and/or use one of our products or services, raise any concerns or complete one of our surveys
- From social media sites or apps. If your settings and preferences allow, we may collect information (including personal data) from social media services such as Facebook and Twitter. For example, where a complaint is made through a social media site

2. Information About Other People

If you provide personal data to us relating to any person other than yourself, you must ensure before you do so that they understand how their personal data will be used and that you are authorised to disclose it to us, and to consent to its use on their behalf.

3. The Personal Data We Collect

The type and quantity of personal data we collect and how we use it depends on the reason for which it is being provided. If you enquire about our products or services, we will ask for your contact details. If you subscribe to one of our services, we may need payment information from you.

4. How We Will Use Your Personal Data

All personal data that we obtain about you and/or any other person whose details you provide will be recorded, used, and protected by us in accordance with current data protection law and this Privacy Policy. We will primarily use the personal data for the following purposes:

- To provide the goods and services you request (including taking payments) and to communicate with you if any goods or services requested are unavailable, or if there is a query or problem with your request or we need to make a change to the service we provide.
- Fraud prevention. To detect and reduce fraud and credit risk.
- Market research. To carry out market research so that we can improve the goods and services we offer.
- Quality Assurance. To ensure we contact you in an effective and efficient manner and that this is audited.

5. Disclosing Your Personal Data

We do not sell personal data but if, for example, we hold an event in conjunction with another organisation, we may share information between us, in which case, we will make that clear to you when you provide the personal data.

In order to provide our products and services, we may, occasionally, appoint other organisations to carry out some of the processing activities on our behalf. These may include, for example, technology hosts, printing companies and mailing houses. In these circumstances, we will ensure that your personal data is properly protected and that it is only used in accordance with this Privacy Policy.

On a very rare occasion, we may need to disclose your details, if required, to the police, regulatory bodies or legal advisors or to comply with a court order or a legal obligation. In these circumstances we will be careful to only provide information that we are required to provide.

6. The Legal Basis For Processing Your Personal Data

The legal basis for the collection and processing of your personal data is:

- That it is necessary to fulfil the contract that you are going to enter into or have entered into with Accuro (Care Services)
- That you have given your consent and/or
- Legitimate interests. That it is necessary for the legitimate interests of Accuro (Care Services) and does not prejudice or harm your rights and freedom. This may occur where, for example, we are required by law to keep records on certain activities such as financial donations and clinical contacts or for HMRC audit or other legal reasons.

Where we have required and obtained your consent to process your personal data, you have the right to withdraw that consent at any time. If you do, it will not affect the lawfulness of any processing for which we had consent prior to your withdrawing it.

7. Invitations, Newsletters, Offers and Opportunities

We would like to contact you and/or any person whose information you provide to us, to provide details of offers and opportunities that are available and about a range of other initiatives in a number of ways, including by post, telephone, text message or by email. Details of how to opt-in to or opt-out of receiving details are in relevant forms you complete and/or in the electronic message you receive.

8. Preferences / Subscribe / Unsubscribe

You and any other person whose personal data you have provided to us can change your/their mind about whether you wish to receive information at any time.

You can change your preferences by using any of the methods shown below (see the section 'Updating And Correcting Personal Data') or by following the instructions with each communication you/they receive.

Please note it may take up to one month for your changes to be implemented and for communications to cease.

9. Data Security

Personal data in our databases is only accessible by appropriately trained staff and volunteers who need to access your personal data as an essential part of their role. All access is tracked through individual login credentials. We take the security of personal data seriously. We employ security technology, including firewalls, and encryption to safeguard personal data and have procedures in place to ensure that our paper and computer systems and databases are protected against unauthorised disclosure, use, loss and damage.

We only use third party service providers where we are satisfied that the security they provide for your personal data is at least as stringent as we use ourselves.

10. Data Retention

We must retain personal data for no longer than is necessary. What is necessary will depend on the circumstances of each case, considering the reasons that the personal data was obtained, and include computer records as well as manual files.

Many records will be kept whilst the person is a:

- Service User, Trustee, Employee or Volunteer

Many records are kept for up to seven years including, but not limited to:

- Records relating to contractual matters
- Financial records to support HMRC audits or provide tax information
- Ex-employee records
- Minutes of meetings

Some records are kept for up to two years, including those where consent appropriate to circumstances has been requested and obtained. These include records of:

- Ex-Service Users
- Ex-Volunteers
- Ex-Trustees
- Attendees at events
- Personal information in responses to questionnaires

Records related to unsuccessful applicants for a job or a Trustee or Volunteer role will be kept for up to 6 months. In all cases the times given are measured from the date of the latest interaction with the data subject in relation to that data.

11. Use Of Your Personal Data Outside The European Union (EU)

We do not process or store data outside of the EU, but data may reside or pass outside the EU during transmission e.g. via email, the routing of which is outside our control.

12. Changes To This Privacy Policy

Privacy laws and practice are constantly developing and we aim to meet high standards. Our policies and procedures are, therefore, under continual review. We may, from time to time, update our security and privacy policies. If we want to make any significant changes in how we will use your personal data we will contact you directly and, if required, seek your consent.

We will ensure our Website has our most up to date policy and suggest that you check this page periodically to review our latest version.

13. Updating And Correcting Personal Data

You can update or correct your personal data by contacting us and asking us to do it for you (see the section 'How to contact us' below). Please include your name, address and/or email address when you contact us as this helps us to ensure that we accept amendments only from the correct person.

We encourage you to promptly update your personal data if it changes. If you are providing updates or corrections about another person, we may require you to provide us with proof that you are authorised to provide that information to us.

14. Your Rights

You have a number of legal rights in respect of your personal data. These include:

- The right to receive a copy of the personal data that we hold about you. The same right applies to any other person whose personal data you provide to us. We will require proof of identity and proof of authority if the request comes from someone other than the person whose data we are asked to provide. This will ensure we only provide information to the correct person. We normally expect to respond to requests within 28 days of receiving them. You may request the data in printed or electronic format (normally csv or pdf) but we will discuss this with you at the time. Requests for Access should be addressed to the Data Protection Officer (DPO).
- The right to withdraw consent to direct marketing (including profiling related to direct marketing). You can exercise this right at any time and can ask us to

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update your preferences. See section 'Updating And Correcting Your Personal Data' above for details.

- The right to withdraw consent to other processing. Where the only legal basis for our processing your personal data is that we have your consent to do so, you may withdraw your consent to that processing at any time and we will have to stop processing your personal data. Please note, this will only affect a new activity and does not mean that processing carried out before you withdrew your consent is unlawful.
- If you consider any of your personal data is inaccurate, you can contact us to do it for you (see section 'Updating And Correcting Your Personal Data' above for details).
- In limited circumstances you may be able to require us to restrict our processing of your personal data. For example, if you consider what we hold is inaccurate and we disagree, the processing may be restricted until the accuracy has been verified.
- Where we have no lawful basis for holding onto your personal data you are entitled to require us to delete it.
- In limited circumstances you may be entitled to have the personal data you have provided to us sent electronically to you for you to provide to another organisation.

If you have any concerns or complaints about how we are handling your data, please do not hesitate to get in touch by (see 'How To Contact Us'). You can also contact the Information Commissioner's Office and can find information on how to do this at www.ico.org.uk.

15. How To Contact Us

Website: Go to our Website and contact us (www.accuro.org.uk/)

Email: Send an email to our Data Protection Officer at enquiries@accuro.org.uk

Mail: Write to us at:

Accuro (Care Services),
Tocher House,
Start Hill,
Near Bishop's Stortford,
Essex.
CM23 7TA

Phone: 01279 870297

