

# Supporting Older People

## Privacy Policy

We want everyone who supports us, or who comes to us for support, to feel confident and comfortable with how any personal information you share with us will be looked after or used. This Privacy Policy sets out how we collect, use and store your personal information (this means any information that identifies or could identify you).

The Supporting Older People Privacy Policy may change so please remember to check back from time to time, this version was last updated on the 14th May 2018. Where we have made any changes to this Privacy Policy, we will make this clear on our website or contact you about any changes.

We are committed to treating you with respect and openness

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### 1. Who we are

Here at Supporting Older People we are committed to protecting your personal information and making every effort to ensure that your personal information is processed in a fair, open and transparent manner.

We are a “data controller” for the purposes of the Data Protection Act 1998 and (from 25 May 2018) the EU General Data Protection Regulation 2016/679 (“Data Protection Law”). This means that we are responsible for, and control the processing of, your personal information.

For further information about our privacy practices, please contact our Data Protection Officer by:

- Writing to Supporting Older People, Community House, 46-50 East Parade, Harrogate, HG1 5RR
- Calling us on 01423 531490
- Emailing to [sop.harrogate@gmail.com](mailto:sop.harrogate@gmail.com)

## 2. How we collect information about you

Everything we do, we do to ensure that we can help older people get both support and respect. We want to make sure you receive the communications that are most relevant to you, be it through visiting our website or receiving emails, post or phone calls. We want to make sure you receive the best attention when you book on one of our events, become a member or a volunteer or make a donation.

We collect information from you in the following ways:

**When you interact with us directly:** This could be if you ask us about our activities, register with us for training or an event, make a donation to us, ask a question about support for yourself or a family member, apply for a job or volunteering opportunity or otherwise provide us with your personal information. This includes when you phone us, visit our website, ask to receive our newsletter, get in touch through the post or in person.

**When you interact with us through third parties:** This could be if you provide a donation through a third party such as Givey or one of the other third parties that we work with and provide your consent for your personal information to be shared with us.

**When you visit our website:** We may gather general information which might include which pages you visit most often and which services, events or information is of most interest to you. We may also track which pages you visit when you click on links in emails from us.

We use this information to personalise the way our website is presented when you visit to make improvements and to ensure we provide the best service and experience for you. Wherever possible we use anonymous information which does not identify individual visitors to our website.

## 3. Information we collect and why we use it

### Personal Information

Personal information we collect includes details such as your name, date of birth, email address, postal address, as well as information you provide in any communications between us. You will have given us this information whilst making a donation, registering for an event, referring yourself for support, applying for a job or to be a volunteer or any of the other ways to interact with us.

We will mainly use this information:

- To process your donations or other payments, to claim Gift Aid on your donations and verify any financial transactions.
- To provide the services that you have requested.
- To update you with important administrative messages about your donation, an event or services you have requested or use.

- To comply with the Charities (Protection and Social Investment) Act 2016 and follow the recommendations of the official regulator of charities, the Charity Commission, which require us to identify and verify the identity of supporters who make major gifts so we can assess any risks associated with accepting their donations.
- To keep a record of your relationship with us.
- To administer the volunteering arrangement, by keeping a record of where and with whom you volunteer with us.

If you do not provide this information, we will not be able to process your donation, sign you up for a particular event or provide services you have requested.

We may also use your personal information:

- To contact you about our work and how you can support Supporting Older People (see section 5 on 'Marketing' below for further information).
- To invite you to participate in surveys or research.

### **Sensitive Personal Information**

If you provide us with any Sensitive Personal Information by telephone, email or by other means, we will treat that information with extra care and confidentiality and always in accordance with this Privacy Policy.

You can of course decide if you want to remain anonymous, if you are happy to share your personal details with staff members or if you would like us to share your story with the media or other parties as part of our work telling people's personal stories about mental health (for example, on our blog).

### **A special note about the Sensitive Personal Information we hold**

Data Protection Law recognises that some categories of personal information are more sensitive. Sensitive Personal Information can include information about a person's health, race, ethnic origin, political opinions, sex life, sexual orientation or religious beliefs.

If you contact us at Supporting Older People you may choose to provide details of a sensitive nature.

We will only use this information:

- For the purposes of dealing with your enquiry, training, and quality monitoring or evaluating the services we provide.
- We will not pass on your details to anyone else without your express permission except in exceptional circumstances. Examples of this might include sharing serious issues such as physical or financial abuse or a major change in circumstances.
- Where you have given us your express consent or otherwise clearly indicated to us that you are happy for us to share your story, then we may publish it on our blog or in other media.

#### **4. Legal basis for using your information**

We will always make sure we have a legal basis for processing your personal information. In some cases, we will only use your personal information where we have your consent or because we need to use it in order to fulfil a contract with you.

However, there are other lawful reasons that allow us to process your personal information and one of those is called 'legitimate interests'. This means that the reason that we are processing information is because there is a legitimate interest for Supporting Older people to process your information to help us achieve our vision of ensuring that older people receive both support and respect.

Whenever we process your personal information under the 'legitimate interest' lawful basis we make sure that we take into account your rights and interests and will not process your personal information if we feel that there is an imbalance.

Some examples of where we have a legitimate interest to process your Personal information are where we contact you about our work via post, use your personal information for data analytics, conducting research to better understand who our supporters are, improving our services, for our legal purposes (for example, dealing with complaints and claims), or for complying with guidance from the Charity Commission.

#### **5. Marketing**

We will only contact you about our work and how you can support Supporting Older People by phone, email or text message, if you have agreed for us to contact you in this manner.

However, if you have provided us with your postal address we may send you information about our work and how you can support Supporting Older People by mail unless you have told us that you would prefer not to hear from us in that way.

You can update your choices or stop us sending you these communications at any time by contacting [sop.harrogate@gmail.com](mailto:sop.harrogate@gmail.com)

#### **6. Sharing your Information**

We will not share your information with any other organisation without your permission unless we have a legitimate or legal reason to do so. We may, however, have to cooperate with law enforcement agencies in any official investigation for example any safeguarding concerns and we may disclose your personal data to the relevant agency or authority in doing so. We never share your personal data with third-parties for marketing purposes.

#### **Legal disclosure**

We may disclose your information if required to do so by law (for example, to comply with applicable laws, regulations and codes of practice or in response to a valid request from a competent authority).

## **7. Keeping your information safe**

We take looking after your information very seriously. We've implemented appropriate physical, technical and organisational measures to protect the personal information we have under our control, both on and off-line, from improper access, use, alteration, destruction and loss.

Unfortunately the transmission of information using the internet is not completely secure. Although we do our best to protect your personal information sent to us this way, we cannot guarantee the security of data transmitted to our site.

Our website may contain links to other sites. While we try to link only to sites that share our high standards and respect for privacy, we are not responsible for the content or the privacy practices employed by other sites. Please be aware that websites that have links on our site may collect personally identifiable information about you. This privacy statement does not cover the information practices of those websites or advertisers.

## **8. How long we hold your information for**

We only keep it as long as is reasonable and necessary for the relevant activity, which may be to fulfil statutory obligations (for example, the collection of Gift Aid).

## **9. What are cookies?**

The types of cookies we use and how you can disable them

In this section you will find information on what cookies may be set when you visit the Supporting Older People website and how to manage and disable them.

What are cookies?

A cookie is a piece of text that a website transfers to your computer's hard disk in order to remember who you are. Cookies interact with your computer and our website by remembering the registration details and preferences from previous visits. Typically, a cookie will contain the name of the website from which the cookie has come, the lifetime of the cookie and a value. The use of cookies does not give us access to the rest of your computer and only the site that created the cookie can read it.

Automatically collected access information

Essential technical information: identification of the page or service you are requesting, type of browser and operating system you are using; and the date and time of access.

None essential technical information: the Internet address of the web site from which you linked directly to our web site, and the “cookie information” described below.

By continuing to use this site you consent to the relevant cookies being set on your device.

We use the following types of cookies:

- Session cookies – these are temporary cookies that remain in the internet browser’s folder of your computer until you close the browser. Our website uses a session cookie which is stored in your browser until you close it to ensure connections to our servers are distributed evenly to provide optimal performance.
- Persistent/Permanent cookies – these remain in the internet browser’s folder of your computer for longer than the time you are visiting this website. We need to use a cookie to remember your refusal of our use of cookies. This cookie does not store any other information and is not used for any other purposes. If you delete your browsing history including cookies you will delete this cookie and will therefore need to readjust your browser setting again.
- Analytical cookies – Our website uses Google Analytics cookies (third party cookie) for the following purposes:
  - a cookie to record the time of your first visit to website, the time of your most recent visit to the website and the time of your current visit;
  - a cookie to record how long you stayed on the website;
  - a cookie to record how you located our website (i.e. Google search, keyword, link from other page etc.).
- Third party cookies – We sometimes allow partners or service providers to use cookies on our websites.

These cookies are used to help us understand how a specific promotion or campaign is performing. The information obtained from these cookies is only used by SOP and its partners. We only share the information obtained through the use of Google Analytics with Google. For more information on Google’s use of your information, please visit the Google Privacy and Data Sharing pages.

The cookies we use for these purposes do not track your Internet usage after leaving our website and we do not store your personal information. They will also not be used in connection with any other information to identify you in any way.

To prevent Google Analytics cookies being set, you may wish to install the Google Analytics Opt-Out Browser Add-On (<http://tools.google.com/dlpage/gaoptout>).

Can I opt out of cookies?

SOP will not use cookies to collect personally identifiable information about you. Yes you can restrict or block the cookies which are set by our websites, and you can do so by accessing your Internet browser settings. The ‘Help’ function within your browser should tell you how.

## 10. Your rights

You have various rights in respect of the personal information we hold about you – these are set out in more detail below. If you wish to exercise any of these rights or make a complaint, you can do so by contacting us at Supporting Older People, Community House, 46-50 East Parade, Harrogate, HG1 5RR, by email at [sop.harrogate@gmail.com](mailto:sop.harrogate@gmail.com) and by phone on 01423 531490.

You can also make a complaint to the data protection supervisory authority, the Information Commissioner's Office, <https://ico.org.uk/>:

- **Access to your personal information:** You have the right to request access to a copy of the personal information that we hold about you, along with information on what personal information we use, why we use it, who we share it with, how long we keep it for and whether it has been used for any automated decision making. You can make a request for access free of charge. Please make all requests for access in writing, and provide us with evidence of your identity.
- **Right to object:** You can object to our 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 processing on this ground. You also have the right to object where we are processing your personal information for direct marketing purposes. Please contact us as noted above, providing details of your objection.
- **Consent:** If you have given us your consent to use personal information (for example, for marketing), you can withdraw your consent at any time.
- **Rectification:** You can ask us to change or complete any inaccurate or incomplete personal information held about you.
- **Erasure:** You can ask us to delete your personal information where it is no longer necessary for us to use it, you have withdrawn consent, or where we have no lawful basis for keeping it.
- **Portability:** You can ask us to provide you or a third party with some of the personal information that we hold about you in a structured, commonly used, electronic form, so it can be easily transferred.
- **Restriction:** You can ask us to restrict the personal information we use about you where you have asked for it to be erased or where you have objected to our use of it.
- **No automated-decision making:** Automated decision-making takes place when an electronic system uses personal information to make a decision without human intervention. You have the right not to be subject to automated decisions that will create legal effects or have a similar significant impact on you, unless you have given us your consent, it is necessary for a contract between you and us or is otherwise permitted by law. You also have certain rights to challenge decisions made about you. We do not currently carry out any automated decision-making.
- Please note, some of these rights only apply in certain circumstances and we may not be able to fulfil every request.

11. **Monitoring**

Your communications with our teams (including by telephone or email) may be monitored and/or recorded for training, quality control and compliance purposes to ensure that we continuously improve our customer service standards.