

Community Lives Consortium

Data Protection Privacy Notice (General)

We ask that you read this privacy notice carefully as it contains important information on who we are, how and why we collect, store, use and share personal information, your rights in relation to your personal information and on how to contact us and supervisory authorities in the event you have a complaint.

Who we are

Community Lives Consortium collects, uses and is responsible for certain personal information about you. When we do so we are regulated under the [General Data Protection Regulation](#) which applies across the European Union (including in the United Kingdom) and the Data Protection Bill 2018 and we are responsible as 'controller' of that personal information for the purposes of those laws.

The personal information we collect and use

Information collected by us

In the course of our business activities we collect the following personal information when you provide it to us, for example through membership applications, visits to our website or places of business, via our CCTV systems:

- Name
- Address
- Email
- Car Registration
- Telephone Number

How and why we use your personal information

Under data protection law, we can only use your personal information if we have a proper reason for doing so, eg:

- to comply with our legal and regulatory obligations
- for our legitimate interests or those of a third party; or
- where you have given consent

A legitimate interest is when we have a business or commercial reason to use your information, so long as this is not overridden by your own rights and interests.

What we use your personal information for

We may use your personal information to:-

- seek your views or comments on the services we provide;
- notify you of changes to our services;
- send you communications which you have requested and that may be of interest to you. These may include information about campaigns, appeals, other fundraising activities, promotions of our associated companies goods and services;
- process a grant or job application. (a separate Privacy Notice is available for the purpose of recruitment)

Who we share your personal information with

We routinely share personal data with:

- BIRDIE CARE SERVICES LIMITED
- third parties we use to help deliver our services to you, eg payment service providers, and delivery companies;
- other third parties we use to help us run our business, eg website hosts;
- our bank;

We only allow those organisations to handle your personal data if we are satisfied they take appropriate measures to protect your personal data. We also impose contractual obligations on them to ensure they can only use your personal data to provide services to us and to you.

We or the third parties mentioned above occasionally also share personal data with:

- our and their external auditors, eg in relation to the audit of our accounts, in which case the recipient of the information will be bound by confidentiality obligations;
- our and their professional advisors (such as lawyers and other advisors), in which case the recipient of the information will be bound by confidentiality obligations;
- law enforcement agencies, courts, tribunals and regulatory bodies to comply with our legal and regulatory obligations;

Who we share your personal data with—in more detail

More details about who we share your personal data with and why are set out in the table below

| Recipient | Processing operation (use) by recipient | Relevant categories of personal data transferred to recipient |
|---|---|--|
| <p>Birdie Care Services Limited a company incorporated in England with registered company number 10863579 whose registered office is at 1 New Fetter Lane, London, EC4A 1AN</p> | <p>The processing of data is necessary for the following purposes (please specify); care management. Care assessment</p> <ul style="list-style-type: none"> ● Care planning ● Medication scheduling & management ● Task planning ● Visit scheduling ● Accident & incident management ● Visit report including geo check in ● Employee management ● Service user management ● Staff training ● Billing & Rostering ● Improvement of the product | <p>Contact details, address, contract details, medical history, medical conditions, health data, emergency contact details, GP/care agency name, ethnic origin, religion, carer's location.</p> <p>Sensitive Data (if appropriate): medical history, medical conditions, health data, ethnic origin, religion, philosophical belief.</p> |

Who we share your personal data with—further information

If you would like more information about who we share our data with and why, please contact us (see 'How to contact us' below).

Whether information has to be provided by you, and if so why

The provision of name, address, car registration, telephone number is required from you to enable us to comply with our Health and Safety responsibilities whilst visiting us. We will inform you at the point of collecting information from you, whether you are required to provide the information to us.

How long your personal information will be kept

We will hold membership details for the period that you are a member of the Consortium and 12 months after you leave.

Visitor information will be held for a period of 12 months for our central offices and 6 years for the properties where we support individuals.

Reasons we can collect and use your personal information

We rely on legal obligation as the lawful basis on which we collect and use your personal data to ensure we comply with applicable Health and Safety Laws.

- To provide services to you
- To comply with our legal and regulatory obligations
- Operational reasons, such as improving efficiency, training and quality control
- Ensuring business policies are adhered to, e.g. policies covering security and internet use
- For our legitimate interests, i.e. to make sure we are following our own internal procedures, so we can deliver the best service to you
- Updating and enhancing our records
- Statistical analysis to help us manage our organisation, e.g. in relation to our financial performance, Service Users, work type or other efficiency measures
- Preventing unauthorised access and modifications to systems
- Ensuring safe working practices, staff administration and assessments

Transfer of your information out of the EEA

The EEA, UK and other **countries** outside the EEA and the UK have differing data protection laws, some of which may provide lower levels of protection of privacy.

It is sometimes necessary for us to transfer your personal data to countries outside the UK and EEA. In those cases we will comply with applicable UK and EEA laws designed to ensure the privacy of your personal data.

We will protect your data by using the approved model contractual clauses with our providers outside the United Kingdom if there is no adequacy decision in place.

CLC uses Google as its primary communication and document storage solution. We may need to transfer your personal data to the countries listed below all of which are located outside the European Economic Area, for the purpose of Google processing our data. Google maintains the highest level of security to ensure data integrity and safety, a copy of our current data processing

agreement with Google can be found here [Google Data Processing Ver 2](#) which ensures compliance under GDPR.

Americas

- Berkeley County, South Carolina
- Council Bluffs, Iowa
- Douglas County, Georgia
- Jackson County, Alabama
- Lenoir, North Carolina
- Mayes County, Oklahoma
- Montgomery County, Tennessee
- Quilicura, Chile
- The Dalles, Oregon

Asia

- Changhua County, Taiwan
- Singapore

We will also transfer your personal data to:

Birdie Care Services Limited. Their Privacy Notice can be found [BIRDIE PROCESSING AGREEMENT](#)

Details of their approved Sub Processors can be found at Appendix 3.

If you would like further information please contact our Data Protection Officer (see 'How to contact us'

below). We will not otherwise transfer your personal data outside of the United Kingdom OR EEA or to any organisation (or subordinate bodies) governed by public international law or which is set up under any agreement between two or more countries

Your rights

Under the [General Data Protection Regulation](#) you have a number of important rights free of charge. In summary, those include rights to:

- fair processing of information and transparency over how we use your use personal information
- access to your personal information and to certain other supplementary information that this Privacy Notice is already designed to address
- require us to correct any mistakes in your information which we hold
- require the erasure of personal information concerning you in certain situations
- receive the personal information concerning you which you have provided to us, in a structured, commonly used and machine-readable format and have the right to transmit those data to a third party in certain situations
- object at any time to processing of personal information concerning you for direct marketing
- object to decisions being taken by automated means which produce legal effects concerning you or similarly significantly affect you
- object in certain other situations to our continued processing of your personal information

- otherwise restrict our processing of your personal information in certain circumstances
- claim compensation for damages caused by our breach of any data protection laws

For further information on each of those rights, including the circumstances in which they apply, see the [Guidance from the UK Information Commissioner's Office \(ICO\) on individuals rights under the General Data Protection Regulation](#).

If you would like to exercise any of those rights, please:

- email, call or write to us or our Data Protection Officer
- let us have enough information to identify you account number, user name, registration details,
- let us have proof of your identity and address (a copy of your driving licence or passport and a recent utility or credit card bill), and
- let us know the information to which your request relates
- If you would like to unsubscribe from any email newsletters you can also click on the 'unsubscribe' button at the bottom of the email. It may take up to 7 days for this to take place.

Keeping your personal information secure

We have appropriate security measures in place to prevent personal information from being accidentally lost, or used or accessed in an unauthorised way. We limit access to your personal information to those who have a genuine business need to know it. Those processing your information will do so only in an authorised manner and are subject to a duty of confidentiality.

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

In order to demonstrate our commitment to keeping personal information safe we are Cyber Essentials Certified - please visit www.iasme.co.uk for further information.

If you want detailed information from the Get Safe Online website on how to protect your information and your computers and devices against fraud, identity theft, viruses and many other online problems, please visit www.getsafeonline.org. Get Safe Online is supported by HM Government and leading businesses.

How to complain

We hope that our Data Protection Officer can resolve any query or concern you raise about our use of your information.

The [General Data Protection Regulation](#) also gives you the right to lodge a complaint with a supervisory authority, in particular in the European Union (or European Economic Area) state where you work, normally live or where any alleged infringement of data protection laws occurred. The supervisory authority in the UK is the Information Commissioner who may be contacted at <https://ico.org.uk/concerns/> or telephone: 0303 123 1113.

Changes to this privacy notice

This privacy notice was published on 25th May 2018 and last updated on 25th May 2018.

We may change this privacy notice from time to time, when we do we will inform you via our website.

How to contact us

Please contact our Data Protection Officer, if you have any questions about this privacy notice or the information we hold about you.

If you wish to contact our Data Protection Officer, please send an email to info@infinitelaw.co.uk, write to The Old Dovecote, Crescent Road, Llandeilo, Carmarthenshire, SA19 6HN or call 0333 200 8773

Do you need extra help?

If you would like this notice in another format (for example: audio, large print, braille) please contact us (see 'How to contact us' above).