



Southend on Sea CIO

Adopted: January 28th 2022
Reviewed: January 19th 2023

PRIVACY POLICY

Guidance and Procedures

PURPOSE

At Age Concern Southend-on-Sea CIO (ACSOS) we are committed to protecting and respecting your privacy.

This policy explains when and why we collect personal information about you, how we use it, the conditions under which we may disclose it to others, how we keep it safe and secure and your rights and choices in relation to your information.

Any questions regarding this policy and our privacy practices should be sent by email to enquiry@acsos.co.uk or by mail to Age Concern Southend-on-Sea CIO, 134 Hamlet Court Road, Westcliff-on-Sea, Essex SS0 7LN. Alternatively, you can call 01702 345373.

SCOPE

ACSOS is a charitable incorporated organisation registered with the Charity Commission for England and Wales with registered charity no. 1160916. We exist to improve the quality of life of older people living in the Borough of Southend-on-Sea and surrounding areas. This policy outlines the responsibilities that ACSOS has with regards to your privacy.

POLICY

HOW DO WE COLLECT INFORMATION FROM YOU?

We obtain information about you in the following ways:

- Information you give us directly

For example, we may obtain information about you when you take part in one of our events, make a donation, join the Hub, become a client of our day care centre or apply to volunteer for us.

- Information you give us indirectly

Your information may be shared with us by third parties, which might include:

- Independent event organisers, for example fundraising sites like Just Giving.
- Other organisations, both charitable and statutory, where we might be able to support you but need your details to enable us to do so; and
- Sub-contractors acting on our behalf who provide us with technical, payment or delivery services, our business partners, advertising network analytics providers and search information providers.

You should check any privacy policy provided to you where you give your data to a third party.

- When you visit our website

We, like many charities, automatically collect the following information:

- Technical information, including the type of device you are using, the IP address, browser and operating system being used to connect your computer to the internet. This information may be used to improve the services we offer.
- Information about your visit to our website, for example, we collect information about pages you visit and how you navigate the website, i.e. length of visits to certain pages, products and services you viewed and searched for, referral services (e.g. how you arrived at our website).

We collect and use your personal information by using cookies on our website. More information on cookies can be found under the “Use of Cookies” section below.

- Social Media

When you interact with us on social media platforms such as Facebook and Twitter, we may obtain information about you (for example, when you publicly tag us in an event photo). The information we receive will depend on the privacy preferences you have set on those types of platforms.

- Public Information

We supplement information on our supporters with information from publicly available sources such as annual reviews, corporate websites, public social media accounts and Companies House to create a fuller understanding of someone’s interests and support.

WHAT TYPE OF INFORMATION IS COLLECTED FROM YOU?

The personal information we collect, store and use might include:

- Your name and contact details (including postal address, email address and telephone number).

- Your date of birth.
- Your medical history and next of kin (applies to Hub members and day care centre clients).
- Information about your activities on our website and about the device used to access it, for instance, your IP address and geographical location.
- Your bank or credit card details. If you make a donation online or make a purchase, your card information is not held by us, it is collected by our third party payment processors who specialise in the secure online capture and processing of credit/debit card transactions;
- Information as to whether you are a UK taxpayer so we can claim gift aid; and
- Any other personal information shared with us.

Data protection laws recognise certain categories of personal information as sensitive and therefore requiring greater protection, for example, information about your health, ethnicity, and religion.

We do not usually collect sensitive data about you unless there is a clear and valid reason for doing so and data protection laws allow us to. For example, where we are required to as a condition of receiving grant funding or to ensure the safety of our members where we ask Hub members and clients of our day care centre for details of any medical issues that we should be aware of and who to contact in the event of an emergency.

Where appropriate, we will make it clear why we are collecting this type of information and what it will be used for.

HOW AND WHY IS YOUR INFORMATION USED?

We may use your information for a number of different purposes, which may include:

- Providing you with the services or information you asked for.
- Keeping a record of your relationship with us.
- Seeking your views or comments on the services we provide.
- Notifying you of changes to our services.
- Sending you communications which you may have requested and that may be of interest to you. These may include information about campaigns, fundraising appeals and activities and promotions of services; and
- Processing job applications.

HOW LONG IS YOUR INFORMATION KEPT FOR?

We keep your information for no longer than is necessary for the purposes it was collected for. The length of time we retain your personal information for is determined by operational and legal considerations. For example, we are legally required to hold some types of information to fulfil our statutory and regulatory obligations (e.g. health/safety and tax/accounting purposes), We review our retention periods on a regular basis.

WHO HAS ACCESS TO YOUR INFORMATION?

We do not sell or rent your information to third parties nor do we share your information with third parties for marketing purposes.

LAWFUL PROCESSING

Data protection law requires us to rely on one or more lawful grounds to process your personal information. We consider the following grounds to be relevant:

- **Specific consent**
Where you have provided specific consent to us using your personal information in a certain way, such as to send you emails or text messages.
- **Performance of a contract**
If we have entered into a contract with you.
- **Legal obligations**
Where necessary so that we can comply with a legal or regulatory obligation to which we are subject, for example, where we are ordered by a court or regulatory authority such as the Charity Commissioner or Fundraising Regulator.
- **Vital interests**
Where it is necessary to protect life or health (for example in the case of a medical emergency suffered by a Hub member at one of our classes or by a client at our day care centre) or a safeguarding issue which requires us to share your information with the emergency services.
- **Legitimate Interests**
Where it is reasonably necessary to achieve our or others' legitimate interests (as long as what the information is used for is fair and does not unduly impact your rights),

We consider our legitimate interests to be running ACSOS as a charitable organisation in pursuit of our aims and ideals. For example, to:

- Understand how people choose/use our services.
- Determine the effectiveness of our services, promotional campaigns, and advertising.
- Monitor who we deal with to protect the charity against fraud, money laundering and other risks.
- Enhance, modify, personalise, or otherwise improve our services/communications for the benefit of our customers; and
- Better understand how people interact with our website.

When we legitimately process your personal information in this way, we consider and balance any potential impact on you (both positive and negative) and your rights under data protection laws. We will not use your personal information where our interests are overridden by the impact on you, for

example, where use would be excessively intrusive (unless, for instance, we are otherwise required or permitted to by law).

When we use sensitive personal information, we require an additional legal basis to do so under data protection laws, so will either do so on the basis of your explicit consent or another route available to us at law (for example, if we need to process it for employment, social security or social protection purposes, your vital interests or, in some cases, if it is in the public interest for us to do so).

FUNDRAISING AND MARKETING COMMUNICATIONS

We may use your contact details to provide you with information about the vital work we do for older people, our fundraising appeals and opportunities to support us, as well as the products and services you can buy, if we think it may be of interest to you.

- **Email/text/phone**

We will only send you fundraising communications by email, text, and telephone if you have explicitly provided your prior consent. You may opt out of these communications at any time by replying to our email with the word “UNSUBSCRIBE”.

- **Post**

We may send you fundraising communications by post unless you have told us that you would prefer not to hear from us.

YOUR RIGHTS

Under UK data protection law, you have certain rights over the personal information that we hold about you. Below is a summary of the rights that we think apply:

- **Right of Access**

You have a right to request access to the personal data that we hold about you.

You also have the right to request a copy of the information we hold about you and we will provide you with this information unless legal exceptions apply.

If you would like to access your information, please send a description of the information that you would like to see and proof of your identity to Age Concern Southend-on-Sea CIO, 134 Hamlet Court Road, Westcliff-on-Sea, Essex SS0 7LN.

- **Right to have your inaccurate personal information corrected**

You have the right to have inaccurate or incomplete information we hold about you corrected. The accuracy of your information is important to us so. If you change email address or, if you believe that any of the other information that we hold is inaccurate or out of date, please contact us by:

- Email to: enquiry@acsos.co.uk

- In writing to: Age Concern Southend-on-Sea CIO, 134 Hamlet Court Road, Westcliff-on-Sea, Essex SS0 7LN.
- Telephone: 01702 345373

- **Right to restrict use**
You have a right to ask us to restrict the processing of some or all of your personal information if there is a disagreement about its accuracy or we are not lawfully allowed to use it.

- **Right of erasure**
You may ask us to delete some or all of your personal information and, in certain cases, and subject to certain exceptions, we will do so as far as we are required to. In many cases, we may anonymise that information rather than erase it.

- **Right to object**
You have the right to object to processing where we are using your personal information (1) based on legitimate interests or (2) for statistical/research purposes.

If you want to exercise any of the above rights please email us at enquiry@acsos.co.uk or write to Age Concern Southend-on-Sea CIO, 134 Hamlet Court Road, Westcliff-on-Sea, Essex SS0 7LN. We may be required to ask for further information and/or evidence of identity. We will endeavour to respond fully to all requests within one month of receipt of your request, however, if we are unable to do so we will contact you with the reasons for the delay.

Please note that exceptions apply to a number of these rights and not all rights will be applicable in all circumstances. For more details, we recommend that you consult the guidance published by the UK's Information Commissioner's Office.

KEEPING YOUR INFORMATION SAFE

When you give us personal information, we take steps to ensure that appropriate technical and organisational controls are in place to protect it. When you are on a secure page, a lock icon will appear on the bottom of web browsers such as Microsoft Internet Explorer.

Non-sensitive details (your email address etc) are transmitted normally over the internet and this can never be guaranteed to be 100% secure. As a result, while we strive to protect your personal information, we cannot guarantee the security of any information you transmit to us and you do so at your own risk. Once we receive your information, we make our best effort to ensure its security on our systems. Where we have given (or where you have chosen) a password which enables you to access certain parts of our website, you are responsible for keeping this password confidential. We ask you not to share your password with anyone.

KEEPING YOUR INFORMATION UP TO DATE

We take reasonable steps to ensure your information is accurate and up to date and may use publicly available sources to identify deceased records or whether you have changed address.

We would really appreciate it if you could let us know when your contact details change.

USE OF “COOKIES”

Like many other websites, our website uses “cookies”. “Cookies” are small pieces of information sent by an organisation to your computer and stored on your hard drive to allow that website to recognise you when you visit. For example, we use cookies to store the service pages you have visited so they load more quickly for you the next time you visit our website. This helps us to deliver a more personalised service when you browse our website and improves our services.

It is possible to switch off cookies by setting your browser preferences. Turning cookies off may result in a loss of functionality when using our website.

LINKS TO OTHER WEBSITES

Our website may contain links to other websites run by other organisations. This policy applies only to our website, so we encourage you to read the privacy statements on other websites you visit. We cannot be responsible for the privacy policies and practices of other websites even if you access those using links from our website.

In addition, if you linked to our website from a third party site, we cannot be responsible for the privacy policies and practices of the owners and operators of that third party site and recommend that you check the privacy policy of that third party site.

16 OR UNDER

We are concerned to protect the privacy of children aged 16 or under. If you are aged 16 or under, please get your parent/guardian’s permission beforehand whenever you provide us with personal information.

VULNERABLE PEOPLE

We are committed to protecting vulnerable supporters, customers and volunteers and appreciate that additional care may be needed when we use their personal information. In recognition of this, we observe good practice guidelines in our interactions with vulnerable people.

REVIEW OF THIS POLICY

This policy will be reviewed annually.

Privacy policy approved: 19/01/23 (date)

Signed by Chair of Trustees: