

# WILTSHIRE CENTRE FOR INDEPENDENT LIVING

## PRIVACY NOTICE – Training Opportunities for Individual Employers and Personal Assistants (PAs)

**Introduction:** This statement explains how Wiltshire Centre for Independent Living (Wiltshire CIL) handles and uses personal data.

Wiltshire CIL is registered as a Data Controller with the Information Commissioner’s Office (ICO). We are committed to protecting your personal information and to being transparent about what information we hold. Wiltshire CIL understands its obligations to you to help you understand how and why we process your personal data. This notice tells you about these uses. Our Data Protection Policy and Procedures are governed by the Data Protection Act 1998 and the EU General Data Protection Regulation 2016/679 (the “GDPR”).

### Why we hold your personal data

- To provide you with information about training opportunities.
- By completing the appropriate form you give us consent to hold your personal data for this purposes.

We may also process your personal information in other circumstances, provided you have given consent for us to do so. We may hold some of your personal data in accordance with other privacy notices, for example, if you are a customer of Wiltshire CIL services or a user of the Wiltshire CIL PA Register.

**What information we collect:** We collect a range of information about you which includes, but is not limited to:

Your name & full contact details	Your attendance at Wiltshire CIL events
Financial information for expense payments	Meetings attended
Contributions made at meeting, as recorded in the notes	Personal data provided by you, i.e. disability, catering preferences or lifestyle status for event management

Data may be stored in a range of different places. These records may be both manual and electronic.

**Sensitive personal data:** The information we hold is that which you provide to us (e.g. by the completion of forms; correspondence (post/email/telephone or otherwise). For notification of training opportunities we may collect a small amount of sensitive personal data for statistical and monitoring purposes. You will not be personally identified in any reports which include this information.

**How we use your personal data:** Your data may be used by us for a number of purposes, including but not limited to:

Publications, invitations and other communications	Newsletters (by email)
Internal reporting and record keeping	Administrative purposes
Responding to data access requests you may make	Notes of meetings

If you have any concerns or queries about any of these purposes, or how we communicate with you, please contact us at the address below. We will always respect a request by you to stop processing your personal data.

**Sharing your data with others:** Personal data, including sensitive data, may be shared between certain members of staff who legitimately need the information to carry out their duties. We endeavour

to ensure that sensitive personal data is only shared with colleagues with your consent, however circumstances may arise where this data is shared with colleagues without your consent. This will only occur if it is necessary to protect your vital interests or the vital interest of another person, or for certain other reasons where it is not possible or appropriate to gain your consent, such as disclosures to the police for prevention or detection of crime, or to meet statutory obligations relating to equality monitoring.

- Data may be shared with reputable 'data processors' for the purposes of sending communications (e.g. emailing newsletters via MailChimp).

Otherwise, Wiltshire CIL does not share data with any third party, except as allowed for in other privacy notices or required by law. We do not sell your personal data to third parties under any circumstances, or permit third parties to sell on the data we have shared with them. Wiltshire CIL does not share data outside of the UK, or the European Union, but if we do we will let you know.

**How we protect data:** We take security of your data seriously. We have internal policies and controls in place to ensure that your data is not lost, accidentally destroyed, misused or disclosed, and is not accessed except by our employees in the proper performance of their duties.

**How long we keep data:** We will keep your personal data only as long as is necessary for the purpose(s) for which it was collected, and in accordance with our Data Protection Policy & Procedures. Data will be securely destroyed when it is no longer required.

**Your rights:** Under certain circumstances, as a data subject, you have a number of rights:

**To be informed:** This Privacy Notice provides the information you are entitled to receive.

**Access:** Please contact us if you would like confirmation that your data is being processed and/or request a Subject Access Request form.

**Rectification:** Please inform us of any data which you would like rectified.

**Erase:** You may exercise your right to have your personal data erased in a number of circumstances (e.g. if the data is no longer necessary in relation to the purpose for which it was created or you withdraw your consent. Where possible we will comply with all such requests, although some details are part of the organisation's permanent records which cannot reasonably be deleted.

**Restrict Processing:** You can tell us that we can keep your data but must stop processing it, including preventing future mailings and communications.

**Data Portability:** Your data is across manual records/electronic records and a bespoke database (LIBRA). We will do our best to provide information in a portable format.

**To Object:** If we can, we will stop processing your data if you object to processing based on legitimate interests or the performance of a task in the public interest/exercise of official authority (including profiling). We will stop processing your data for direct marketing if you tell us to. We will stop processing your data if you object to processing for the purposes of research and statistics.

Wiltshire CIL does not use automated decision-making.

We reserve the right to judge what information we must continue to hold in the fulfilling of any contracts we hold.

If you would like to exercise any of these rights, please contact the Data Protection Officer, Wiltshire Centre for Independent Living, 11 Couch Lane, Devizes, Wiltshire SN10 1EB, 0300 1233 442 [info@wiltshirecil.org.uk](mailto:info@wiltshirecil.org.uk) If you believe the organisation has not complied with your data protection rights, you can complain to the Information Commissioner: <https://ico.org.uk/concerns>

We will notify you of any changes we make to this statement.