**PRIVACY NOTICE – Self Funders (paying for your own care and support)**

**Introduction:** This statement explains what you can expect when Wiltshire Centre for Independent Living (Wiltshire CIL) collects your information if you have a temporary or ongoing relationship with us in respect of providing support to you as a Self Funder. 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”).

As part of a contract with Wiltshire Council, we are able to provide a certain services to those who pay for their own care and support.

**Why we hold your personal data:** We may need to use information about you to:

(a) Deliver services and support to you; (b) understand and provide the appropriate level of support to you; (c) manage the service we provide to you; (d) investigate any concerns or complaints you have about the services you receive; (e) inform you of services that we can offer you; (f) check the quality of our services and help with the research and planning of new services.

We only keep the information we need in order to provide the service and/or support to you. If we use your personal information for research and analysis, we will always maintain your anonymity unless you have given your explicit consent that you can be identified.

**The lawful basis to obtain and use your personal information:** To enable us to provide a service to you, we use the following legal basis for processing your information:

* **Consent:** When you contact us to request a service, you will provide a certain amount of personal information to us. In doing so, you give us consent to process your information for the purpose of receiving the requested service. You can withdraw your consent at any time.

**What information we collect:** In order to provide you with support, Wiltshire CIL must collect and process personal data relating to you and this may include sensitive personal data. Any information we hold will have been provided by you or a person authorised to act on your behalf. Data held about you may include, but is not restricted to:

* Name / Full contact details / Date of Birth / Age / Ethnicity / Language / Health details / Support needs
* Bank or building society account details, e.g. if you use our Banking or Payroll Service
* Correspondence between yourself and Wiltshire CIL (by post/email/telephone)
* Correspondence between Wiltshire CIL and third parties on your behalf.
* Details of any person authorised to act on your behalf.

Data is stored in a range of different places. These records may be both manual and electronic and in the form of case notes on our internal management system.

**Sensitive personal data (Special category):** Wiltshire CIL recognises the significance of sensitive personal data. Information such as race; ethnic origin; politics; religion; trade union membership; genetics; biometrics; health; sex life; or sexual orientation fall within the definition of sensitive data. Wiltshire CIL processes certain sensitive personal data in order to provide a full support service to you, and only if you have provided us with this information yourself.

**How we use your personal data:** Your data is used by Wiltshire CIL for a number of purposes, including but not limited to: (a) providing the support service; (b) keeping you informed of any relevant changes, e.g. if you are an individual employer; (c) internal reporting, record keeping and the maintaining of case notes.

Communications to you may be sent by post, telephone or email. Your personal mobile telephone number will only be used if you have given consent. 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 and disclosing your data with others:** We may share your information with third-parties and other professionals, depending on the service we provide to you. For example:

* If you ask us to set up payroll, pension, or some other service on your behalf, then we will only pass on the details that the organisation needs to set up the service for you.
* Data may be shared with reputable ‘data processors’ for the purposes of sending communications electronically (e.g. MailChimp for our e-newsletter/payroll hours reminder).

Wiltshire CIL may, from time to time, need to make other disclosures of your personal information without your consent but any such disclosures will be made in accordance with the obligations imposed on Wiltshire CIL by the Data Protection Act and the GDPR and other relevant legislation, and with due consideration of your rights. Circumstances may arise where data is shared without your consent. This will only occur if it is necessary to protect your vital interests or the vital interests of another person, or for certain other reasons where it is not possible or appropriate to gain your consent, i.e. disclosures to the police for prevention or detection of crime. Wiltshire CIL does not share data with third parties outside of the UK, or the European Union, other than mentioned elsewhere in this notice.

**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, accidently destroyed, misused or disclosed, and is not accessed except by authorised 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 the Data Protection Act 2018, you have the right to find out what information we hold about you. These include the right to:

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| be informed about how your data is being used | stop or restrict the processing of data |
| access personal data | data portability  |
| have incorrect data updated | object to how your data is processed in certain circumstances |
| have data erased |  |

You can find out more detailed information about your rights here: <https://ico.org.uk/your-data-matters/>

Wiltshire CIL does not use automated decision-making processes, or profiling.

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 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>