

WILTSHIRE CENTRE FOR INDEPENDENT LIVING

OUR PRIVACY NOTICE (SERVICE PROVISION)

This statement explains how we at Wiltshire CIL (WCIL) handle and use personal data collected from those who have a temporary or ongoing relationship with us in the respect of using our services. We are registered as a Data Controller with the Information Commissioner's Office (ICO), committed to protecting your personal information and to being transparent about what information we hold about you. We understand our obligations to help you understand how and why we process your personal data. Our Data Protection Policy and Procedures are governed by UK General Data Protection Regulation (UK GDPR).

WHY WE HOLD YOUR PERSONAL DATA:

- To deliver services and support to you, and to understand and provide the appropriate level of support to you.
- To manage the service(s) we provide to you and inform you of services that we can offer you.
- To investigate any concerns or complaints you have about the services you receive.
- To check the quality of our services and help with the research and planning of new services.
- To keep track on the use of public funds.
- For our legitimate business interests, - reasonable use in line with our aims and activities.

We only keep the information we need to in order to provide a service and/or support to you. Any information used for research and/or analysis will remain anonymous unless you have given your explicit consent that you can be identified.

WHAT INFORMATION WE COLLECT: To carry out our services, we collect and process a range of information (including sensitive personal data). Other information we hold will have been provided to us by another organisation/person authorised to act on your behalf, e.g., received by us as a referral. In some circumstances it may be necessary to share your information with the appropriate referring organisation/person. Data is stored in a range of different places - these may be both manual and electronic and in the form of case notes on our internal management systems. WCIL recognises the significance of sensitive personal data. WCIL processes certain sensitive personal data in order to provide a full support service to you.

LEGAL BASIS FOR PROCESSING:

- You have given WCIL clear consent to process your personal data for a specific purpose(s).
- For the performance of a task carried out in the public interest; in the exercise of official authority vested in us or a legal obligation that applies to us.
- For the purpose of the legitimate interests pursued by us or a third party which is in the legitimate interest of all parties involved.
- Special Category data: for the provision of health or social care or treatment, or the management of health or social care systems and services.

HOW WE USE YOUR PERSONAL DATA: Your personal data may be used for several purposes, including but not limited to:

- Internal reporting and record keeping.
- Administrative purposes.
- Responding to requests you may make.
- Keeping you informed of any relevant changes. Communications to you may be sent by post, telephone, or email, as advised by you on the Consent Form.

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: Data may be shared between certain members of WCIL staff who legitimately need the information to carry out their duties. We may share your information with, and obtain information about you, from third-party and other professionals, depending on the service we provide to you. For example:

- With the appropriate referring organisation/person.
- If a safeguarding issue arises.
- If there is a criminal investigation and we are requested to provide information.
- With reputable third-party organisations we use to help provide our services to you, i.e. provision of payroll services, or sending communications to you.

There may be times WCIL needs to make other disclosures of your personal information without your consent. Any such disclosures will be made in accordance with the obligations imposed on WCIL by the UK General Data Protection Regulation and other relevant legislation. This will always be done with due consideration of your rights. This would normally only occur if it were necessary to protect your vital interests or the vital interests of another person, or for example, disclosures to the police for prevention or detection of crime.

WCIL does 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. WCIL does not share data outside of the UK, or the European Union, but if we do, we will let you know.

Photography & Filming: If you have consented to WCIL using for example, photographs/video recordings, these may be used internally and externally to promote the work of WCIL. This could be in either print or digital format and used e.g., in publications/websites/e-marketing/social media/film and for teaching/research purposes. Images on websites can be viewed throughout the world and some countries may not provide the same level of protection to the rights of individuals as the UK. The images may be kept permanently once they are published, and as an archive. If you withdraw your consent at any time, the media will not be used in the future but may continue to appear in publications already in circulation.

HOW WE PROTECT YOUR DATA AND HOW LONG WE KEEP YOUR DATA: We take the security of your data seriously. Internal policies and controls are in place to ensure that your data is not lost, accidentally destroyed, misused, or disclosed and not accessed except by those authorised during the proper performance of their duties. Your data will only be kept as long as is necessary for the purpose(s) for which it was collected and in accordance with our Data Protection Policy & Procedures and will be securely destroyed when it is no longer required. We reserve the right to judge what information we must continue to hold in the fulfilling of any contracts we hold.

YOUR RIGHTS: You can find out more detailed information about your rights here: <https://ico.org.uk/for-the-public/>.

[1] The right to be informed; **[2]** The right of access; **[3]** The right to rectification; **[4]** The right to erasure; **[5]** The right to restrict processing; **[6]** The right to data portability; **[7]** The right to object; WCIL does not use automated decision-making processes, or profiling.

If you would like to exercise any of these rights, you can contact our Data Protection Officer using the details below. If you believe the organisation has not complied with your data protection rights, you can complain to the Information Commissioner's Office : <https://ico.org.uk/make-a-complaint/data-protection-complaints/data-protection-complaints/>
