

## **Privacy Policy**

At Community Advice we collect and use your personal information to help solve your problems, improve our services and tackle wider issues in society that affect people's lives.

We only ask for the information we need. We always let you decide what you're comfortable telling us, explain why we need it and treat it as confidential.

When we record and use your personal information, we:

- only access it when we have a good reason
- only share what is necessary and relevant
- don't sell it to anyone

At times we might use or share your information without your permission. If we do, we'll always make sure there's a legal basis for it. This could include situations where we have to use or share your information:

- to comply with the law for example, if a court orders us to share information. This is called 'legal obligation'
- to protect someone's life for example, sharing information with a paramedic if a client was unwell at our office. This is called 'vital interests'
- to carry out our legitimate aims and goals as a charity for example, to create statistics for our national research. This is called 'legitimate interests'
- for us to carry out a task where we're meeting the aims of a public body in the public interest - for example, delivering a government or local authority service. This is called 'public task'
- to carry out a contract we have with you for example, if you're an employee we might need to store your bank details so we can pay you. This is called 'contract'
- to defend our legal rights for example, sharing information with our legal advisors if there was a complaint that we gave the wrong advice

We handle and store your personal information in line with the law - including the General Data Protection Regulation and the Data Protection (GDPR) Act 2018.

This page covers how we, as your local charity, handle your information locally in our offices.



### How Community Advice Ards and North Down collect your data

We'll get your permission by asking you to either:

- sign a paper consent form tick a box online
- give agreement over the phone for example, if you call our Adviceline, MacMillan Project and Debt Action Help line.

Before we ask for your permission, we'll always explain how we use your information.

If you're using our service and you've been referred to us from another advice charity, they'll send us your information using a referral form. They'll get your permission before sending us your information.

We will collect your data via a client record form which you will complete on paper or over the phone depending on how you contact the service. This information is then transferred onto our electronic case management system Advice Pro and you are allocated a case reference number.

We are legally entitled to process your personnel data only when you have consented for us to do so. To make sure that we have your consent, that it has been freely given and is a specific, informed and unambiguous indication of your wishes, and that it is properly recorded, we have designed our enquiry forms to ensure this for example: getting your permission by signing a 'client permission and consent form'.

## What Community Advice Ards and North Down ask for

We'll only ask for information that's relevant to your problem. Depending on what you want help with, this might include:

- your name and contact details so we can keep in touch with you about your case
- personal information for example about family, work, or financial circumstances
- details about services you get that are causing you problems like energy or post
- details of items or services you've bought, and traders you've dealt with
- information like your gender, ethnicity or sexual orientation

If you don't want to give us certain information, you don't have to. For example, if you want to stay anonymous we will only record information about your problem and make sure you are not identified.



### **How Community Advice Ards and North Down use your information**

The main reason we ask for your information is to help solve your problem.

We only access your information for other reasons if we really need to - for example:

- for training and quality purposes
- to investigate complaints
- to get feedback from you about our services
- to help us improve our services

All advisers and staff accessing data have had data protection training to make sure your information is handled sensitively and securely.

### Working on your behalf

When you give us authority to act on your behalf, for example to help you with a Universal Credit claim, we'll need to share information with that third party. We commonly share information with Benefits Offices/Departments, Food Banks/ Charities, Ards and North Down Borough Council, Money Advice Service, Tribunal Appeal Courts and Creditors.

# **How Community Advice Ards and North Down store your information**

Whether you get advice face to face, over the phone, by email or webchat, our adviser will log all your information, correspondence, and notes about your problem into our secure shared electronic case management system Advice Pro. Advice Pro is accessed by Community Advice Ards and North Down and external assessors for auditing purposes. Paper copies of your data may also be stored securely and have restricted access. Some of your information might also be kept within our secure email and IT systems.

We keep your information for 6 years. If your case has been subject to a serious complaint, insurance claim or other dispute we keep the data for 16 years.

If you use the consumer service, we keep your information for 6 years and then anonymise it. This means that you can no longer be identified from it.

Our case management systems are hosted within the EEA and wherever possible, the UK.

Most of our trusted partners store their data securely within the European Economic Area (EEA) in line with data protection law.

There might be other places we store your information, depending on how you accessed our advice.



#### If you contact us for email advice

Emails between you and your adviser are stored within the local Community Advice office email system where the adviser is based.

#### If you get advice over the phone

When you call, you'll hear a recorded message telling you how we use and store your information - you can let the adviser know if you disagree.

If you call us, and we are unable to answer your call, you will be redirected to a voicemail service. These messages are normally processed within 48 hours and deleted after from the recording system.

## How Community Advice Ards and North Down share your information

We use some information to create statistics about who we're helping and what problems are the most common. This information is always anonymised - you can't be identified. We share these with funders, regulators, government departments and publicly on our blogs, reports, social media and press releases. The statistics also inform our policy research, campaigns, or media work.

We may also share data with third parties for satisfaction monitoring and quality monitoring purposes.

#### If we're concerned about yours or someone else's safety

If something you've told us makes us think you or someone you know might be at serious risk of harm, we could tell the police or social services - for example if we think you might hurt yourself or someone else.

# **Contact Community Advice Ards and North Down about your information**

If you have any questions about how your information is collected or used, you can contact our offices located in Holywood, Ards and Bangor.

Telephone: 0300 123 9287, open Monday to Friday 10am-4pm

You can contact us to:

- find out what personal information we hold about you
- correct your information if it's wrong, out of date or incomplete
- request we delete your information



- ask us to limit what we do with your data for example, ask us not to share it if you haven't asked us already
- ask us to give you a copy of the data we hold in a format you can use to transfer it to another service
- ask us stop using your information

### Who's responsible for looking after your personal information

We store advice client information on Advice Pro which is a fully-managed, secure web-based case management system. The client data in Advice Pro is held within the UK in a secure data centre compliant with Information Security Code of Practice ISO27001.

All other electronic data is stored on our own internal servers except where we use third party services and cloud services, such as MailChimp for our eNews and SurveyMonkey for collecting training evaluations. Where data is held in hardcopy it is stored in secure filing systems and no unauthorised personnel has access to them.

You can <u>find out more about your data rights on the Information Commissioner's</u> website.

## If you want to make a complaint

If you're not happy with how we've handled your data, you can <u>make a complaint through our website.</u>