

# **PRIVACY POLICY**

| Date of<br>Update | Version<br>Number | Initials | Change Notes      |
|-------------------|-------------------|----------|-------------------|
| 10/05/19          | V01               | IL       | Original Draft    |
| 16/05/19          | V02               | ST       | Policy Signed off |
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This Privacy Policy applies to information we, Dementia Support collect about individuals who interact with our organisation. It explains what personal information we collect and how we use it.

If you have any comments or questions about this notice, feel free to contact us at info@dementia-support.org.uk

#### 1. Personal data that we process

The following tables explains the types of data we collect and the legal basis, under current data protection legislation, on which this data is processed. The tables are divided into specific areas Dementia Support operates.

Purpose Data (key elements) Basis Enquiring about our Name, email, message Legitimate interests - it is necessary for organisation and its work us to read and store your message so that we can respond in the way that you would expect. Name, email Consent - you have given your active Subscribing to email updates about our work consent. Making a donation Name, email, address, Legitimate interests - this information is donation information necessary for us to fulfill your intention including gift aid of donating money and your declaration expectation of receiving a confirmation message. Signing up as a Name, email, address Consent and legitimate interest – this information is necessary to contact supporter individuals about services, events, fundraising and marketing Website activity collected Website functionality Legitimate interests through cookies - it is necessary for us to store a small amount of information, usually through cookies, to deliver functionality that you would expect, such as remembering the contents of your order before you have fully completed the process. Indirect collection Name, email, address, Your information may be shared with donation information us by fundraising sites like JustGiving including gift aid or Virgin Money Giving declaration Independent third parties will only do this when you have specified that you wish to support Dementia Support and

Fundraising and Marketing

| with your clear consent. When this<br>happens we will treat the information in<br>the same way as if you had shared it<br>directly with us. |
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#### Dementia Support Services

| Purpose                                     | Data (key elements)  | Basis   |
|---|--|---|
| Day Breaks Services                         | <ul> <li>Name</li> <li>Contact Information</li> <li>Date of Birth</li> <li>How they heard<br/>about DS</li> <li>Carer Information</li> <li>How they wish to be<br/>contacted</li> <li>Case Notes</li> <li>Relevant<br/>Medical/Medication<br/>history</li> </ul>   | Consent – to provide information on<br>customers using the service to ensure<br>we can safely and effectively meet their<br>needs.<br>Non-personalised data will also be<br>used for statistical purposes |
| Wayfinding Service                          | <ul> <li>Name – Carer and<br/>PWLD</li> <li>Contact Information –<br/>Carer and PLWD</li> <li>Date of Birth – Carer<br/>and PLWD</li> <li>How they heard<br/>about DS</li> <li>If they have a family<br/>member living with<br/>Dementia – if carer<br/>presenting</li> <li>How they wish to be<br/>contacted</li> <li>Brief history of<br/>presenting issues</li> <li>Onward referrals<br/>both internal and<br/>external</li> <li>Consent to hold<br/>information</li> <li>Plan of action</li> </ul> | Consent – to provide information on<br>who is accessing the service and to<br>ensure we have a record of<br>interventions.<br>Non-personalised data will also be<br>used for statistical purposes         |
| 3 <sup>rd</sup> party clinics and therapies | <ul> <li>Name</li> <li>Contact Information</li> <li>Residence area</li> <li>Relevant medical<br/>history (for certain</li> </ul>   | Active consent – by booking services<br>you have given your active consent.<br>Non-personalised data will also be<br>used for statistical purposes.   |

|            | therapies)  |  |
|------------|---|--|
| Activities | <ul> <li>Name</li> <li>Contact Information</li> <li>Residence area</li> <li>Relevant medical history<br/>(for certain activities)</li> </ul>  | Active consent – by booking services<br>you have given your active consent.<br>Non-personalised data will also be<br>used for statistical purposes.    |
| Smart Zone | <ul> <li>Name – Carer and<br/>PWLD</li> <li>Contact Information –<br/>Carer and PLWD</li> <li>Date of Birth – Carer<br/>and PLWD</li> <li>How they wish to be<br/>contacted</li> <li>Brief history of<br/>presenting issues</li> <li>Consent for onward<br/>referral internal or<br/>external</li> <li>Consent to hold<br/>information</li> </ul> | Active consent – by requesting referral<br>you have given your active consent.<br>Non-personalised data will also be<br>used for statistical purposes. |

#### 2. How we use your data

We will only use your data in a manner that is appropriate considering the basis on which that data was collected, as set out in the tables at the top of this policy.

For example, we may use your personal information to:

- reply to enquiries you send to us;
- handle donations or other transactions that you initiate;
- where you have specifically agreed to this, send you marketing communications by email relating to our work which we think may be of interest to you.
- Where you have specifically agreed to this, making onward referrals to internal services or outside organisations
- we may add publicly accessible information to an individuals record to enable us to identify and communicate activities that may be of interest to them

All supporter records maintained by Dementia Support will be kept confidential to the required extent under the GDPR. Supporter records will be held on a secure database (Harlequin). Customers records will be held on a secure computer drive and where required within password protected documents.

You decide how you want us to contact you, whether by mail, email or by phone or text message. You can update your communication preferences at any time by letting us know. We will also send you a communication at timely intervals so you can update and refresh your communication preferences

#### 3. When we share your data

We will not sell or swap your details with other charities or third parties. We will only pass your data to third parties in the following circumstances:

- you have provided your explicit consent for us to pass data to a named third party;
- we are using a third party purely for the purposes of processing data on our behalf and we have in place a data processing agreement with that third party that fulfils our legal obligations in relation to the use of third party data processors; or
- we are required by law to share your data.

In addition, we will only pass data to third parties outside of the EU where appropriate safeguards are in place as defined by Article 46 of the General Data Protection Regulation.

#### 4. How long we keep your data

We take the principles of data minimisation and removal seriously and have internal policies in place to ensure that we only ever ask for the minimum amount of data for the associated purpose and delete that data promptly once it is no longer required.

Where data is collected on the basis of consent, we will seek renewal of consent at least every three years.

#### 5. Rights you have over your data

You have a range of rights over your data, which include the following:

- Where data processing is based on consent, you may revoke this consent at any time and we will make it as easy as possible for you to do this (for example by putting 'unsubscribe' links at the bottom of all our marketing emails).
- You have the right to ask for rectification and/or deletion of your information.
- You have the right of access to your information.
- You have the right to lodge a complaint with the Information Commissioner if you feel your rights have been infringed.

A full summary of your legal rights over your data can be found on the Information Commissioner's website here: <u>https://ico.org.uk/</u>

If you would like to access the rights listed above, or any other legal rights you have over your data under current legislation, please get in touch with us at <u>info@dementia-support.org.uk</u>

Please note that relying on some of these rights, such as the right to deleting your data, will make it impossible for us to continue to deliver some services to you. However, where possible we will always try to allow the maximum access to your rights while continuing to deliver as many services to you as possible.

Customers and Supporters have the right to see their own data held on record, and to challenge its accuracy, also making complaints to both the charity concerned in the first instance and to the Information Commissioners Office

## 6. Cookies & usage tracking

A cookie is a small file of letters and numbers that is downloaded on to your computer when you visit a website. Cookies are used by many websites and can do a number of things, eg remembering your preferences, recording what you have put in your shopping basket, and counting the number of people looking at a website.

Where cookies are used to collect personal data, we list these purposes in section 1 above, along with other personal data that we collect. However, we also use some cookies that do not collect personal information but that do help us collect anonymous information about how people use our website. We use Google Analytics for this purpose. Google Analytics generates statistical and other information about website usage by means of cookies, which are stored on users' computers. The information collected by Google Analytics about usage of our website is not personally identifiable. The data is collected anonymously, stored by Google and used by us to create reports about website usage. Google's privacy policy is available at <a href="http://www.google.com/privacypolicy.html">http://www.google.com/privacypolicy.html</a>.

## 7. Modifications

We may modify this Privacy Policy from time to time and will publish the most current version on our website. If a modification meaningfully reduces your rights, we'll notify people whose personal data we hold and is affected.

#### 8. Data Controller

Dementia Support has a nominated Data Controller:

Sally Tabbner, CEO

info@dementia-support.org.uk 01243 888691