

Privacy Notices Role Holders

HANDS

PRIVACY NOTICE ROLE HOLDERS

(e.g. Trustees, coordinator, volunteers)

We take your privacy seriously and treat all the personal data you give us with great care.

Your personal data – what is it?

“Personal data” is any information about a living individual which allows them to be identified from that data (for example a name, photographs, videos, email address, or postal address). The processing of personal data is governed by [the Data Protection Bill/Act 2017 the General Data Protection Regulation 2016/679 (the “GDPR” and other legislation relating to personal data and rights such as the Human Rights Act 1998)].

How do we process your personal data?

HANDS is a data controller of your personal data. As such we will comply with our legal obligations to keep your personal data up to date; to store and destroy it securely; to not collect or retain excessive amounts of data; to keep personal data secure, and to protect personal data from loss, misuse, unauthorised access and disclosure and to ensure that appropriate technical measures are in place to protect personal data.

We use your personal data for some or all of the following purposes (for example some of the role-holders are volunteers and no financial information will be processed for these role holders): -

- To enable the HANDS co-ordinator and office volunteers to contact you in support of assisting providing services to our clients (e.g. providing transport, shopping or for visiting HANDS clients);
- To enable us to meet all legal and statutory obligations;
- To carry out comprehensive safeguarding procedures (including on-boarding due diligence, for example, DBS checks) in accordance with best safeguarding practice from time to time with the aim of ensuring that all vulnerable adults are provided with safe environments;
- To deliver and to carry out any other voluntary or charitable activities for the benefit of HANDS clients as provided for in the HANDS constitution.
- To administer HANDS membership records;
- To promote the interests of HANDS;
- To manage our employees and volunteers;
- To maintain our own accounts and records;
- To seek your views or comments;
- To notify you of changes to our services, events and role holders
- To send you communications which you have requested or that may be of interest to you. These may include information about HANDS events or promotional activities or volunteer social occasions;
- To process a grant or application for a role;

- We will process data about role holders for legal, personnel, administrative and management purposes and to enable us to meet our legal obligations, for example to pay role-holders, monitor their performance and to confer benefits in connection with your engagement as a Role Holder. "Role Holders" includes volunteers, employees, contractors, agents, staff, retirees, temporary employees, beneficiaries, workers, treasurers and other role holders.
- We may process sensitive personal data relating to Role Holders including:
 - sick leave and take decisions as to the Role Holder's fitness for work
 - the Role Holder's racial or ethnic origin or religious or similar information in order to monitor compliance with equal opportunities legislation;
 - in order to comply with legal requirements and/or obligations to third parties.

What data do the data controllers listed above process?

- Names, titles, and aliases, photographs, dates of birth.
- Contact details such as telephone numbers, postal addresses, and email addresses.
- Where they are relevant to work, or where you provide them to us, we may process demographic information such as gender, age, date of birth, marital status, nationality, education/work histories, academic/professional qualifications, employment details, hobbies, family composition, and dependants.
- Non-financial identifiers such as passport numbers, driving license numbers, vehicle registration numbers, taxpayer identification numbers, employee identification numbers, tax reference codes, and national insurance numbers.
- Financial identifiers such as bank account numbers, payment card numbers, payment/transaction identifiers, policy numbers, and claim numbers.
- Financial information such as salary, record of earnings, tax code, tax and benefits contributions, and expenses claimed
- Other employee data (not covered above) relating to Role Holders
- "Sensitive personal data" as defined in the regulations.

What is the legal basis for processing your personal data?

Most of our data is processed because it is necessary for our legitimate interests, or the legitimate interests of a third party such as our clients. An example of this is contacting you about a service requested by or on behalf of a client.

Some of our processing is necessary for compliance with a legal obligation such as compliance with the Charity Acts and Charity Commission regulations or the Disclosure and Baring Service (DBS).

We may also process data if it is necessary for the performance of a contract with you, or to take steps to enter into a contract, or for your voluntary role with us. An example of this would be processing your data in connection with the provision of HANDS support services.

Where your information is used **other than in accordance with one of these legal bases**, we will first obtain your consent to that use.

Sharing your personal data

Your personal data will be treated as strictly confidential. It will only be shared with third parties including other data controllers where it is necessary for the performance of the data controllers' tasks or where you first give us your prior consent. It is possible that we may need to share your data with

- Our IT services provider who assists HANDS with maintaining all HANDS systems and applications and IT security, or our payroll provider (HANDS co-ordinator only)
- On occasion, neighbouring organisations and agencies with which we are carrying out joint events or activities.

How long do we keep your personal data?

In general, we will endeavour to keep data only for as long as we need it. We will keep some records permanently if we are legally required to do so. We may keep other records for an extended period of time. For example, it is current best practice to keep financial records for a minimum period of 7 years to support HMRC audits.

Your rights and your personal data

You have the following rights with respect to your personal data: -

When exercising any of the rights listed below, in order to process your request, we may need to verify your identity for your security. In such cases we will need you to respond with proof of your identity before you can exercise these rights.

1. The right to access information we hold on you
 - At any point you can contact us to request the information we hold on you as well as why we have that information, who has access to the information and where we obtained the information from. Once we have received your request we will respond within one month.
 - There are no fees or charges for the first request but additional requests for the same data may be subject to an administrative fee .
2. The right to correct and update the information we hold on you
 - If the data we hold on you is out of date, incomplete or incorrect, you can inform us and your data will be updated.
3. The right to have your information erased
 - If you feel that we should no longer be using your data or that we are illegally using your data, you can request that we erase the data we hold.
 - When we receive your request we will confirm whether the data has been deleted or the reason why it cannot be deleted (for example because we need it for our legitimate interests or regulatory purpose(s)).
4. The right to object to processing of your data
 - You have the right to request that we stop processing your data. Upon receiving the request we will contact you and let you know if we are able to comply or if we have legitimate grounds to continue to process your data. Even after you exercise your right to object, we may continue to hold your data to comply with your other rights or to bring or defend legal claims.

5. The right to data portability
 - You have the right to request that we transfer some of your data to another controller. We will comply with your request, where it is feasible to do so, within one month of receiving your request.
6. The right to withdraw your consent to the processing at any time for any processing of data to which consent was sought.
 - You can withdraw your consent easily by telephone, email, or by post (see Contact Details below).
7. The right to object to the processing of personal data where applicable.
8. The right to lodge a complaint with the Information Commissioners Office.

Transfer of Data Abroad

Any electronic personal data transferred to countries or territories outside the EU will only be placed on systems complying with measures giving equivalent protection of personal rights either through international agreements or contracts approved by the European Union. Our website is also accessible from overseas so on occasion some personal data (for example in a newsletter) may be accessed from overseas.

Further processing

If we wish to use your personal data for a new purpose, not covered by this Data Protection Notice, then we will provide you with a new notice explaining this new use prior to commencing the processing and setting out the relevant purposes and processing conditions. Where and whenever necessary, we will seek your prior consent to the new processing.

Changes to this notice

We keep this Privacy Notice under regular review and any updates will be held by the HANDS office. This Notice was last updated in April 2018.

Contact Details

Please contact us if you have any questions about this Privacy Notice or the information we hold about you or to exercise all relevant rights, queries or complaints at:

The Data Controller,
HANDS
1st Floor, Twickenham Library
Garfield Road
Twickenham
TW1 3JT
Email: handscaregroup@handscaregroup.org.uk
020 8891 3346

You can contact the Information Commissioners Office on 0303 123 1113 or via email <https://ico.org.uk/global/contact-us/email/> or at the Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire. SK9 5AF.

This Notice is effective from 25 May 2018.