



## **The Hunter Centre Privacy Policy**

### **1. What is the purpose of this Policy?**

The Hunter Centre (registered charity, number 1173587) is committed to protecting the privacy and security of your personal information. This notice describes how we collect and use personal information about you during and after your relationship with us. The Hunter Centre is a “data controller” under data protection law. This means that we are responsible for deciding how we hold and use personal information. This notice applies to current and former clients, employees, volunteers and contacts for whom we hold personal data. This notice does not form part of any contract to provide services. We may update this notice at any time.

### **2. Data protection principles**

We will comply with data protection law currently the Data Protection Act 2018. This says that the personal information we hold about you must be:

- Used lawfully, fairly and in a transparent way.
- Collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes.
- Relevant to the purposes we have told you about and limited only to those purposes.
- Accurate and kept up to date.
- Kept only as long as necessary for the purposes we have told you about.
- Kept securely.

### **3. Why are you collecting and using my personal information?**

We intend to rely on the following lawful bases to collect and use your personal or sensitive personal data:

- Your consent as a data subject
- Processing necessary for the performance of our contract.
- Processing necessary for compliance with a legal obligation.

- Processing necessary for performance of tasks carried out in the public interest.
- Necessary for the purposes of legitimate interest pursued by us.
- A vital interest

## **4. How we collect your personal information**

We collect personal information in a number of different ways:

4.1 Directly from you – for example from information you provide on an application form

4.2 From someone acting on your behalf – for example from someone providing an application form on your behalf

4.3 From our website

– technical information, including the type of device you are using, the IP address, browser and operating system being used to connect your computer to the internet.

- information about your visit to this website, for example we collect information about pages you visit and how you navigate the website, i.e. length of visits to certain pages, services you viewed and searched for, referral sources (eg. how you arrived at our website).

## **5. The kind of information we hold about you**

Personal data, or personal information, means any information about an individual from which that person can be identified. Data protection laws recognise certain categories of personal information as sensitive and therefore requiring greater protection, for example information about your health.

We only collect sensitive data about you if there is a clear and valid reason for doing so and data protection laws allow us to; for example, we may ask for your health information to establish whether we are the right service for you and what assistance a client may require during the carrying out of our duties. We collect, store, and use the following categories of personal information about you in the course of the services we provide:

### **5.1 Clients and their carers**

- Personal and business contact details such as name, title, addresses, telephone numbers, and email addresses.
- Identity information and documentation (including passport, driver's licence, utility bills and bank statements, photographs).
- Special category data such as religion, sex, disability, ethnic origin and health related data such as medications, diagnosis, vaccination status
- Additional information that is or may be required to enable us to undertake our services.

### **5.2 Employees**

- Personal contact details such as name, title, addresses, telephone numbers, and email addresses.

- Identity information and documentation (including passport, driver's licence, utility bills and bank statements).
- Health related data such as vaccination status
- Financial information such as salary and bank account details

### **5.3 Volunteers**

- Personal contact details such as name, title, addresses, telephone numbers, and email addresses.
- Identity information and documentation (including passport, driver's licence, photographs)
- Health related data such as vaccination status

### **5.4 Donors**

- Personal contact details such as name, title, addresses, telephone numbers, and email addresses.

### **5.5 All**

For all users of our website, we process information about activity on our website and about the device used to access it using cookies. For instance our website provider collects data including your IP address and geographical location, the date and time of visit, operating system, browser version and pages accessed. This data is used for analysis purposes only to provide insight into site traffic, site activity, how visitors find our site, and audience engagement with our site to enable us to ensure our website remains relevant. Please see our Cookie policy on the website ([Link once it's in place](#)) for further details and for details of how to disable analytics cookies.

## **6. How is your personal information used**

We use your personal information primarily to enable us to provide the services we have been asked to undertake. This may be acting for you personally or with another such as a carer or attorney or trustee. We also use your personal information for related purposes including

- identity verification,
- administration of files,
- updating existing records if you have used our services previously,
- analysis to help improve the management of the charity,
- notifying you of changes to our service
- sending you communications which you have requested or may be of interest to you
- for statutory returns and legal and regulatory compliance.

The information will be held in hard copy and/or electronic format. You are responsible for ensuring the accuracy of all the personal data you supply to us. Where you are acting as an attorney, agent or trustee, you agree to advise your principal or the beneficiary of the trust that their personal information will be dealt with on these terms.

## **7. Who has access to your information**

We will not sell or rent out your information to third parties, and we do not share your information for marketing purposes. However, we may disclose your information to third parties in order to achieve the other purposes set out in this policy.

If we are working on your situation in conjunction with other professionals who are advising you, we will assume, unless you notify us otherwise, that we may share and disclose relevant personal data and information about your situation to them, if we feel it is appropriate and necessary.

Some personal data may be shared with third parties for the purposes of performing our core activities. All the service providers we use (including but not limited to cloud services, archiving, compliance checks, banking and payroll provision) are subject to confidentiality.

There may be occasions when we are under a legal duty to share personal information with law enforcement or other authorities, the Charity Commission and the Information Commissioner. If we are required to disclose information to the National Crime Agency, we may not be able to tell you that a disclosure has been made. We may have to stop working for you for a period of time and may not be able to tell you why. We cannot be held liable for any loss you suffer due to delay or our failure to provide information in these circumstances.

Occasionally some of our files may be audited by external auditors or examiners to ensure we meet our legal, quality and financial management standards. Some information may be disclosed to our professional indemnity insurers and to our financial auditors if required.

Any data that is shared with a third party will be in line with the lawful bases above.

Most of the personal information you provide to us is kept in the UK; where we transfer your data outside the EEA (our website is hosted in the USA) we will ensure that any transfer meets our legal requirements.

## **8. How long will you use my information for?**

We will only retain your personal information for as long as necessary to fulfil the purposes for which we collected it, including for the purposes of satisfying any legal, accounting, or reporting requirements. We also retain and archive the files we keep for at least 6 years, possibly longer as may be required by law. After this period of time your file of papers, including any electronic files, will be destroyed confidentially without further reference to you, unless we contact you to confirm other arrangements, or you contact us to request your file of papers at an earlier date.

## 9. Marketing

We would like to keep in touch with you and let you know periodically about information relating to The Hunter Centre and its services and objectives that we think may be of interest to you or to tell you about events or developments in the charity. We ask you to provide your email address and give specific confirmation that you want to “opt in” to us sending you such information in the future. If you provide your consent, you may withdraw it at any time.

## 10. Your rights in connection with personal information

Under certain circumstances, under UK Data Protection law you have the right to:

- **Request access** to your personal information. This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.
- **Request correction** of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.
- **Request erasure** of your personal information. This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal information where you have exercised your right to object to processing (see below).
- **Right to Object to processing** of your personal information where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground. You also have the right to object where we are processing your personal information for direct marketing purposes.
- **Request the restriction of processing** of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.
- **Request the transfer** of your personal information to another party.

If you want to exercise any of these rights, please write to our registered office at 7 Index House, Midhurst Road, Liphook, Hampshire GU30 7TN or email us at [manager@thehuntercentre.co.uk](mailto:manager@thehuntercentre.co.uk). We will have one month to respond to your request. Further information on your rights can be found on the Information Commissioners Website <http://www.ico.org.uk/for-the-public/>.

You will not normally have to pay a fee to access your personal information (or to exercise any of the other rights). However, we may charge a reasonable fee if your request for access is clearly unfounded or excessive. Alternatively, we may refuse to comply with the request in such circumstances.

## **10.1 What we may need from you**

We may need to request specific information from you to help us confirm your identity and ensure your right to access the information (or to exercise any of your other rights). This is another appropriate security measure to ensure that personal information is not disclosed to any person who has no right to receive it.

## **10.2 Right to withdraw consent**

In the limited circumstances where you may have provided your consent to the collection, processing and transfer of your personal information for a specific purpose, you have the right to withdraw your consent for that specific processing at any time, unless we have another legitimate basis for doing so in law. To withdraw your consent, please write to us at our registered office 7 Index House Midhurst Road Liphook Hampshire GU30 7TN or email us at [manager@thehuntercentre.co.uk](mailto:manager@thehuntercentre.co.uk).

## **11. Keeping your personal information secure**

We take all reasonable technical and organisational measures to prevent personal information from being accidentally lost, used or accessed in an unauthorised way. We also have procedures in place to deal with any suspected data security breach. We will notify you and any applicable regulator of a suspected data security breach where we are legally required to do so.

Please be aware that no security system can prevent all potential security breaches.

## **12. Complaints**

If you have a complaint, in the first instance please write to us at our registered office 7 Index House Midhurst Road Liphook Hampshire GU30 7TN or email us at [manager@thehuntercentre.co.uk](mailto:manager@thehuntercentre.co.uk) with your complaint or query. You may also lodge a complaint with the Information Commissioner who may be contacted at [www.ico.org.uk/concerns/](http://www.ico.org.uk/concerns/).

**It is important that you read, take note of this policy and possibly retain a copy for future reference. If you wish to contact us in connection with this notice or for any other reason, please write to us at our registered office 7 Index House Midhurst Road Liphook Hampshire GU30 7TN or either email us at [manager@thehuntercentre.co.uk](mailto:manager@thehuntercentre.co.uk) or call us on 01428 654710 and ask to speak to the manager on duty.**

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