

# LINCOLNSHIRE VOLUNTARY ENGAGEMENT TEAM CIC

## PRIVACY STATEMENT

### HOW WE USE YOUR DATA

#### WHO ARE WE?

We are **Lincolnshire Voluntary Engagement Team**, a not-for-profit Community Interest Company registered in England with Company Registration Number 12478789 at 36 Nettleham Road, Lincoln LN2 1RE.

If you have any questions about this Policy, or about how we look after your data generally, please contact Emily Ward [emily.ward@lvet.org]

#### INTRODUCTION

Lincolnshire Voluntary Engagement Team CIC ('we' or 'us' etc), is a 'controller' of data. This means that, under the UK General Data Protection Regulation (**GDPR**) and the Data Protection Act 2018 (**DPA**), we may control and process your personal data and, in certain circumstances, special categories of data (previously known as 'sensitive data').

We take privacy very seriously. We are committed to keeping your data secure and processing it fairly and lawfully. We ask that you read this policy very carefully because it contains important information about how we process your personal data.

This policy is aimed at our staff, officers, volunteers, contractors, beneficiaries and any other third parties interacting with us.

#### PERSONAL DATA WE MAY COLLECT ABOUT YOU

Personal information means any information about you from which you can be identified, but it does not include information where your identity has been removed ('anonymous data').

As the 'controller' of personal information, we are responsible for how that data is managed. The GDPR and the DPA sets out our obligations to you and your rights in respect of how we manage your personal information.

As the 'controller' of your personal information, we will ensure that the personal information we hold about you is:

1. used lawfully, fairly and in a transparent way.
2. collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes.
3. relevant to the purposes we have told you about and limited only to those purposes.
4. accurate and kept up to date.
5. kept only as long as necessary for the purposes we have told you about.
6. kept securely.

### **Information collected by us:**

We may collect, use, store and transfer information about you in several different ways and this information may be classified in different categories. Please take care when submitting information to us. Only provide us with information that you are happy for us to process in accordance with this Privacy Statement, particularly with regard to confidential or sensitive information.

In the course of our work, the following types of data may be collected from you:

**Identity Data** includes first name, maiden name, last name, username or similar identifier, marital status, title, date of birth and gender.

**Contact Data** includes address, delivery address, email address and telephone numbers.

**Status Data** includes information about why you are being referred to a specialist organisation through our pathway; this may include health data.

**Financial Data** includes bank account and payment card details.

**Technical Data** includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access this website.

**Enquiry Data** includes data you provided us with when you contact us with an enquiry.

**Usage Data** includes information about how you use our website and services, as well as the frequency and pattern of your service use.

**Marketing and Communications Data** includes your preferences in receiving marketing from us and our third parties and your communication preferences.

**Anonymous Data** includes data that may be socio-demographic (for instance information about your work or profession, nationality, education) but also includes any combination of personal information identified above, including health information, but in a format from which you cannot be identified either directly or indirectly

**Special Category Data** includes data regarding health conditions or data relating to protected characteristics such as race, ethnicity or sexual orientation

**Criminal Offence Data** includes data relating to criminal convictions and offences, for example that may be revealed during a DBS check

### **Sources of Data:**

We may collect personal data about you when you make an enquiry with us, apply for a job or otherwise interact with our personnel, visit our website, or complete a form and submit it to us.

We may also collect data about you from third parties, such as GPs, primary care networks, and other service providers, when you are referred through our network.

## **REASONS WE COLLECT AND USE YOUR PERSONAL INFORMATION**

We rely on the following grounds within the GDPR:

- Article 6(1)(f) – to process your personal data in pursuit of **legitimate interests** (**‘Legitimate Interests’**)
- Article 6(1)(a) – processing is conducted with your **consent** to process personal data for specified purposes (**‘Consent’**)
- Article 6(1)(b) – processing is necessary for the performance of our **contracts** to provide individuals with services (**‘Contract’**)
- Article 6(1)(c) – processing is necessary for us to demonstrate compliance with our **regulatory framework** and the law (**‘Compliance’**)

With specific regard to *Special Categories of Data*, we also rely on the condition of processing set out in Article 9(h) of the GDPR (health and social care), the basis in law of which is established under paragraph 2 of Part 1 of Schedule 1 of the DPA, being that the processing is necessary for health and social care purposes (**‘Health and Social Care’**). In particular, the processing is necessary for purposes connected with the management of a health care system or services and or social care system or services.

We will only use your personal data to the extent permitted by the law. The following table sets out the types of data we may use, the reason we may use this data and the legal basis for doing so:

<b>Reason for Using Data</b>	<b>Type of Data</b>	<b>Legal Basis</b>
To communicate with you	Identity, Contact, Enquiry	Contract, Compliance or Legitimate Interests
To perform a contract with you	Identity, Contact, Financial, Enquiry	Contract
To manage our relationship with you	Identity, Contact, Financial, Enquiry	Contract, or Legitimate Interests
Improvement of our service	All data	Legitimate Interests
To advise you of opportunities and advertising, including market research	Contact, Marketing and Communication	Consent
To detect, prosecute and prevent crime	All data	Compliance, legitimate interests
to assess and manage any potential risks to the proper running of our services	Identity, Contact, Usage, Financial, Technical	Legitimate Interests

To administer and protect our business and our website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	Technical, Usage, Anonymous Data	Legitimate Interests
To use data analytics to improve and enhance our service	Technical, Usage, Anonymous Data	Legitimate Interests
To consider employing you if you contact us via one of job application areas or pages of our websites	Contact, Identity, Enquiry, Criminal Offence	Legitimate Interests, Consent
To manage our employment relationship with you, if applicable	Contact, Identity, Financial	Contract, Legitimate Interests
To manage our client relationship with you and our third party service providers, if applicable	Contact, Identity, Enquiry, Status, Special category	Contract, Legitimate Interests, Health and Social Care
To enable third party service providers to provide Social Prescribing services to you using data hosted by us; this may include primary care networks, health and care services and community sector service providers	Contact, Identity, Enquiry, Status, Anonymous, Special Category, Criminal Offence	Contract, Legitimate Interests, Health and Social Care
Sharing information with GPs as part of the NHS's approach to Personalised Care	Contact, Identity, Status, Anonymous, Special Category	Contract, Legitimate interests, Health and Social Care

## MARKETING AND OPTING OUT

We will not contact you for the purposes of direct marketing unless you have asked us to do so. However, if you have asked us to do so and later you change your mind, you can opt-out at any time with no hassle. To do this, just let us know. See further '**Your rights**' below for details about how to contact us.

## WHO HAS ACCESS TO YOUR PERSONAL INFORMATION?

We will not sell or rent your information to third parties. We will not share your information with third parties for marketing purposes. We may have to share your personal data with the third parties set out below:

**Third Party Service Providers working on our behalf:** We may pass your information to our third-party service providers, agents, subcontractors and other associated organisations for the purposes of completing tasks and providing services to you on our behalf. However, when we use third party service providers, we disclose only the personal information that is necessary to deliver the service and we have a contract in place that requires them to keep your information secure and not to use it for their own direct marketing purposes.

**Our website provider:** to enable us and them to deliver their service to us, carry out analysis and research on demographics, interests and behaviour of our users and supporters to help us gain a better understanding of them to enable us to improve our services. This may include connecting data we receive from you on the website to data available from other sources. Your personally identifiable data will only be used where it is necessary for the analysis required, and where your interests for privacy are not deemed to outweigh their legitimate interests in developing new services for us.

**Our professional advisors** and agents for the purposes of advising and representing us in any matter connected with your account or your use of our website upon which we legitimately consider that advice or representation is needed.

**Social Prescribing Link Workers and Service Providers** as part of a referral pathway: This may include primary care network providers, NHS partnership organisations, voluntary sector organisations, PCN managers, clinical directors, and other healthcare and social care providers. In this regard, we host a social prescribing platform (Social Rx Connect) that manages data for and on behalf of such third party providers.

**Your General Practitioner (GP):** As part of the NHS's commitment to holistic healthcare provision, information about your social prescribing pathway referral is provided to your GP so they can ensure they are offering you the best support. If you would prefer for your GP not to be provided with information about your referral pathway, please discuss this with the service provider directly.

**The Provider of Social RX Connect:** We use a specialist social prescribing platform designed by Promatica Digital which has been created to help health and social care professionals, social prescribers and community organisations to refer individuals as well as organise and analyse their social prescribing efforts. As part of their role to maintain such software, Promatica Digital will have access to your personal information.

Please be reassured that we will not release your information to third parties for them to use for their own direct marketing purposes, unless you have requested us to do so, or we are required to do so by law, for example, by a court order or for the purposes of prevention of fraud or other crime.

If you are concerned about how any third party may use your personal information, please contact them directly. We are not responsible for how other organisations use, store, disclose or process your personal information, even if we have provided it through systems that we host.

## KEEPING YOUR DATA SECURE

We will use technical and organisational measures to safeguard your personal data, for example:

- Access to our systems is controlled by password and username which are unique to the user;
- We store your electronic personal data on secure servers;
- We keep paper records to a minimum, and destroy any temporary paper records once electronic systems have been updated. If we need to store paper records they are kept in secure environments;
- We train our staff in good records management;
- Payment details are encrypted

Non-sensitive details (your contact details and preferences for example) are transmitted normally over the Internet, and this can never be guaranteed to be 100% secure. As a result, while we strive to protect your personal information, we cannot guarantee the security of any information you transmit to us, and you do so at your own risk. Once we receive your information, we make our best effort to ensure its security on our systems. Where we have given (or where you have chosen) a password which enables you to access certain parts of our websites, you are responsible for keeping this password confidential. We ask you not to share your password with anyone.

Personal data will be stored on encrypted cloud-based systems operated by Microsoft Office and, in the case of social prescribing, Promatica Digital (UK-based). These systems are secure and password protected.

## TRANSFERRING YOUR INFORMATION OUTSIDE OF EUROPE

We may store your data temporarily on our cloud service operated by Microsoft. This may include limited special categories of data. We have taken appropriate steps to satisfy ourselves that your data will be secure during this process; we have a contractual relationship with Microsoft that underpins this. As part of that security, Microsoft may store your data in one or more of its international data centres, meaning that your data may be stored temporarily outside of the European Economic Area. If you have any concerns about this, please contact us using the details below.

## INFORMATION ABOUT OTHER INDIVIDUALS

If you give us information on behalf of someone else, you confirm that the other person has appointed you to act on his/her behalf and has agreed that you can:

- Give consent on his/her behalf to the processing of his or her personal data
- Receive on his/her behalf any data protection notices

## HOW LONG DO WE KEEP YOUR DATA FOR?

As a general rule, we will not keep your data for any longer than is necessary to complete tasks or provide you with services. We have a separate policy setting out retention periods for specific types of data. You can ask to see this policy by writing to us, using the contact details under the “**Your Rights**” section below. You also have the right to ask us to delete your data in certain circumstances (sometimes known as ‘*the right to be forgotten*’.)

## COOKIES

A cookie is a small text file which is placed onto your computer (or other electronic device) when you access our website. If you use our website, we may use cookies to:

- Track your use of the site;
- Recognise you whenever you visit this website (this speeds up your access to the site as you do not have to log on each time);
- Obtain information about your preferences, online movements and use of the internet;
- Carry out research and statistical analysis to help improve our content, products and services and to help us better understand our visitor/customer requirements and interests
- Target our marketing and advertising campaigns more effectively

- Make your online experience more efficient and enjoyable

If you do not want to accept cookies, you can change your browser settings so that cookies are not accepted. If you do this, please be aware that you may lose some of the functionality of this website. For further information about cookies and how to disable them please go to: [www.aboutcookies.org](http://www.aboutcookies.org) or [www.allaboutcookies.org](http://www.allaboutcookies.org)

If you visit our website when your browser is set to accept cookies, we will interpret this as an indication that you consent to the use of cookies. This includes cookies that are essential in order to enable you to move around the site and use its features and cookies that are not essential but gather information about your use of the site.

If you want detailed information from Get Safe Online on how to protect your information and your computers and devices against fraud, identity theft, viruses and many other online problems, please visit [www.getsafeonline.org](http://www.getsafeonline.org). Get Safe Online is supported by HM Government and leading businesses.

## YOUR RIGHTS

You have various rights under the GDPR, including the following rights:

- **Right to object:** If we are using your data because we deem it necessary for our legitimate interests to do so, and you do not agree, you have the right to object. We will respond to your request within 30 days (although we may be allowed to extend this period in certain cases). Generally, we will only disagree with you if certain limited conditions apply.
- **Right to withdraw consent:** Where we have obtained your consent to process your personal data for certain activities (for example, marketing), you may withdraw your consent at any time.
- **Data Subject Access Requests (DSAR):** Just so it's clear, you have the right to ask us to confirm what information we hold about you at any time, and you may ask us to modify, update or delete such information. At this point we may comply with your request or, additionally do one of the following:
  - we may ask you to verify your identity, or ask for more information about your request; and
  - where we are legally permitted to do so, we may decline your request, but we will explain why if we do so.
- **Right to erasure:** In certain situations (for example, where we have processed your data unlawfully), you have the right to request us to "erase" your personal data. We will respond to your request within 30 days (although we may be allowed to extend this period in certain cases) and will only disagree with you if certain limited conditions apply.
- **Right of data portability:** If you wish, you have the right to transfer your data from us to another data controller. We will help with this – either by directly transferring your data for you, or by providing you with a copy in a commonly used machine-readable format.
- **Right to lodge a complaint with a supervisory authority:** You also have the right to lodge a complaint with your local supervisory authority, details of which can be found below.

To exercise any of your rights concerning your information, please send an email to the following address:

**hello@lvet.org**

Or write to us at the following postal address:

**Lincolnshire VET, c/o Rose Regeneration, Exchequergate House, 18a Minster Yard, Lincoln LN2 1PX.**

We may ask you to provide us with proof of your identity. Please do not be offended; this may occur even if we know you. It is a requirement of the GDPR in some cases.

## REVIEW

This Policy was last reviewed in March 2022.

We may change this privacy policy from time to time. You should check this policy occasionally to ensure you are aware of the most recent version which will apply each time you access our website.

## THE INFORMATION COMMISSIONER'S OFFICE

More information about privacy laws can be found at [www.ico.org.uk](http://www.ico.org.uk)

Details of your local supervisory authority: The Information Commissioner's Office. You can contact them in the following ways:

- Phone: 0303 123 1113
- Email: [casework@ico.org.uk](mailto:casework@ico.org.uk)
- [Live chat](#), via the ICO website
- Post: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF