

1.0 Introduction

This policy summarises how Colebrook (SW) Ltd collects and uses personal information about the people who visit our websites or give us their data over the telephone, face to face in person, and in writing, as well as how we store data, how we use it, and how those who give us their details can request that their data is used by Colebrook (SW) Ltd.

Colebrook (SW) Ltd takes the privacy of our clients, supporters, hirers, service users, staff, partners and volunteers very seriously, and is committed to protecting your privacy. Colebrook (SW) Ltd's privacy statement is outlined in section 2.0 of this policy.

References to the Colebrook (SW) Ltd website should be taken to include accessing the Healthwatch Plymouth website, or such others as may be developed from time to time with the Colebrook (SW) Ltd brand or by services operated by Colebrook (SW) Ltd.

Colebrook (SW) Ltd is registered with the Information Commissioner's Office, registration no. Z2469369, with Healthwatch Plymouth established as a trading name under the same registration.

If you have any queries about this policy, please contact the Data Protection Officer - contact details given at the end of this document. The terms of this policy may change, so please check it from time to time.

2.0 Colebrook (SW) Ltd Privacy Statement

The General Data Protection Regulation and The Data Protection Act 2018 provide the legal framework that defines how personal information can be used. Colebrook (SW) Ltd is fully committed to complying and has a legal duty to protect any information we collect from you.

- Your personal information is only used for the purpose for which we collect it
- Only information that we actually need is collected
- Your personal information is only seen by those who need it to do their jobs
- We will not pass your personal information on to any other organisation without your consent unless we are required to do so by law (see "How do we use this Information?" below)
- Personal information is retained only for as long as it is required for the purpose collected
- We will, where necessary, keep your information up to date
- Your information will be protected from unauthorised or accidental disclosure
- We will provide you with a copy of your personal information on request (please see below for information on access rights and requests)
- Inaccurate or misleading data will be corrected as soon as possible
- These principles apply whether we hold your information on paper or in electronic form.

3.0 How do we collect information?

We obtain personal information from you when you enquire about our activities, make a referral to our services, send or receive an e-mail, book a room or take part in an organised activity in our community centres, donate to us, ask a question, meet and or receive support from us, provide feedback on our or other organisations' services or otherwise provide us with personal information. We may also receive information about you from third parties; for example, from a social worker who wants to make a referral on your behalf or a relative who asks for information to be provided.

Where you ask us to provide a specific service, and there is no other lawful basis for collecting the info, you may be asked to give consent to your data being collected. This may be verbally, online or by signed consent

form, and this particularly relates to sensitive information you may not want shared. However, even if you have not formally given consent, we may still collect personal information as outlined in the next section.

4.0 What information do we collect?

The personal information we collect might include name, e-mail address, postal address, date of birth, next of kin, telephone number and the nature of your enquiry.

We may also collect sensitive personal information such as equality and diversity information required to allow us to review whether our services reach all sections of the community (which may be due to a contractual obligation under any funding we receive for providing the service), and information about your support needs which may include details of a personal nature, such as your current or background health and offender information if this is required for the purpose you are involved with Colebrook (SW) Ltd.

We also gather general information about the use of our website and social media platforms, such as which pages users visit most often, and which are of most interest. We may also track which pages users visit when they click on links sent in Colebrook (SW) Ltd e-mails.

We may use this information to personalise the way our website is presented when users visit it, to make improvements to our website and to ensure we provide the best service for users. We will only use aggregated or anonymous information which does not identify individual visitors to our website. Please see the section below on Cookies.

We may also take photographs from time to time, these will only be taken with your consent and we will ask you to sign a consent form it, which will explain how we may use it

5.0 How do we use this information?

5.1 For clients and service users

For people who have contacted us for support directly, or been referred to us by another person or organisation or because they are involved with one of our services, we will only use the information provided to facilitate our work with you and to record information required by the organisation that funds us for the work (such as a local authority), as well as for internal administrative purposes such as monitoring the quality of our service. We may, however, contact you to ask for your assessment of how we helped you and your satisfaction with the service provided, or other market research. We will not publish any information that could identify you personally without your consent.

If you are kind enough to give a donation or indicate your support for us such as by giving a compliment, then we may contact you to thank you, or to obtain your permission to publicise details of your particular case or feedback; but not any details that identify you without your consent.

We will not contact you otherwise unless with your express permission.

We will not share your information with other parties other than for the purposes of providing a service, although we may be required to share information with the council or other organisation that is funding us to provide the service. In addition we may have a legal responsibility to share information in connection with your welfare or the welfare of people around you – see our Confidentiality Policy. Finally we will share information regarding any crime committed against us, our staff or anyone else acting officially on our behalf

If we do share your information outside of these circumstances, we will ensure you have provided consent to enable us to do this, for example when a service transfers to another provider, or if you have agreed specific information can be used for a particular purpose.

5.2 For users and hirers of our Community Centres, enquirers and donors

If you contact us for general information about Colebrook (SW) Ltd or about using our Community Centres, or make a donation, we may contact you further to promote events, products and services.

We will use your personal information for:

- Fundraising, where you have indicated you support our work
- Conducting market research

If you do receive a marketing or promotional communication from us and no longer require this, there will be an 'unsubscribe' e-mail address or contact details for you to inform us, or you can contact the Data Protection Officer - contact details at end of this document.

5.3 For volunteers and members

We will use your personal information for:

- Working with you in the roles you are engaged to comply with our legal obligations
- Providing information about the organisation's work, relevant to your
- Contacting you to promote our events, products and services.
- Providing and personalising our services to beneficiaries
- Conducting market research
- For administrative purposes such as to record information on your volunteering activity

We may need to share your information with our service providers, associated organisations and agents for the purposes described above.

5.4 For employees

See separate Employee Privacy Statement

5.5 For Job Applicants

We will use your personal information in order to process your application and if applicable invite you for interview. If you are not successful in your application, your information will be kept for a maximum of 6 months after the application in case of query, then it will be deleted from all records. If you are successful the paperwork will form part of your employment records see separate Employee Privacy Statement

6.0 Your choices on receiving information

You have a choice about whether you want to receive information about our work and fundraising activities. We will not use your personal information for marketing purposes if you have indicated that you do not wish to be contacted. You can change your communication preferences (such as e-mail or post at any time), by contacting the relevant service contact.

7.0 Access Rights and Requests

You have the right to see what personal data we hold about you. Subject access requests must be submitted in writing. Please request our Subject Access Request Form to ensure you supply all the information we need to process your request. You can also use this form if you are requesting information on behalf of somebody else.

You may also request a right to be forgotten by requesting your identifying information is deleted.

If you are receiving a service from us we may have a business need to retain some personal information to continue to offer you the service. If this is the case you will be informed of the information we will be keeping and our grounds for keeping it in the response to your request to be forgotten. We also need to keep this

information for a period after you have stopped receiving our services, these timescales are shown in our Data Retention Guidelines

You also have the right to rectification, if any of the information we hold about you is incorrect.

To obtain a copy of the personal information we hold about you, or request your information is deleted please write to us or submit your form to the Data Protection Officer - contact details at the end of this document.

8.0 Transfer of Information

We confirm that any information we hold about you is stored and transmitted within the United Kingdom and the European Economic Area and will not be transferred outside these areas, unless stated in our specific privacy statements.

9.0 Right to prevent processing of your personal data

If you believe we are processing incorrect data or have any other data related query, you can request a temporary stop on us processing your data until it is satisfactorily restored.

10.0 Under 16s

Colebrook (SW) Ltd does not work with people under 16, but is concerned to protect the privacy of children and young people aged under 16, where there is any contact. Where appropriate, we will seek consent from a parent or guardian before collecting personal information about a child aged under 16. However, where we are supporting a young person directly, any information will only be shared with their consent.

11.0 How do we protect personal information?

We take appropriate measures to ensure that the personal information disclosed to us is kept secure, accurate, and up to date. We will ensure that your personal information is kept only for so long as is necessary for the purposes for which it was collected and is securely destroyed in accordance with our Data Retention Guidelines - see our [Data Protection Policy](#).

Personal information is stored online using secure hosted servers in the UK. Our online contact process is protected by digital encryption. We also use a secure server when you make a donation or payment via our website which is provided by Paypal

Personal information stored on paper is kept in locked filing cabinets, and cabinets containing sensitive information are held in locked storage areas. All offices are secured and locked when not in use.

12.0 Will we disclose the information we collect to outside parties?

We will not share your information with other parties other than for the purposes of providing a service, although we may be required to share information with the council or other organisation that is funding us to provide the service. In addition we may have a legal responsibility to share information in connection with your welfare or the welfare of people around you – see our Confidentiality Policy. Finally we will share information regarding any crime committed against us, our staff or anyone else acting officially on our behalf

We do not sell any personal details to any other third parties.

We will only disclose data when obliged to disclose personal data by law, or the disclosure is ‘necessary’ for purposes of national security, taxation, legal compliance and criminal investigation, or we have your consent, and to the following:

- Suppliers we engage to process data on our behalf. In such cases, information is only shared for the purpose of providing services on our behalf relating to communications, secure storage and processing of data, rota completion, or agreements between yourself and Colebrook (SW) Ltd. Such processing is conducted under relevant contracts that detail the data processing requirements.

We will not sell any information about your web browsing activity.

13.0 Deleting personal data

Our standard retention periods for personal information can be found in our Data Retention Guidelines.

By personal information we mean any information that could identify you as an individual or could be used to inform any decision about you.

When we no longer need to keep your personal information, we will delete or securely destroy your contact details, any associated documents, and any other information that could identify you personally.

We may keep other information about your case where this cannot identify you personally but is required for contractual or operational reasons.

By deletion we mean put “beyond use” as defined by the Data Protection Information Commissioner’s Office guidelines.

14.0 Cookie Usage

Colebrook (SW) Ltd’s website uses cookies, tracking pixels and related technologies. Cookies are small data files that are served by our platform and stored on your device. Our site uses cookies dropped by us or third parties for a variety of purposes including to operate and personalise the website. Cookies help us to provide you with a better experience by allowing us to understand what areas of the website are of interest to our visitors (e.g. via Google analytics).

Our cookies aren’t used to identify you personally. They collect anonymous information on the pages visited and we do not use advertising cookies. Most browsers will allow you to turn off cookies. Please note however that turning off cookies will restrict your use of our website. To learn more about cookies and how to manage them, visit AboutCookies.org

15.0 Trademarks and copyright

Colebrook (SW) Ltd’s websites contain material which is protected by copyright and/or other intellectual property rights. All copyright and intellectual property rights including the names, images and logos are owned by Colebrook (SW) Ltd unless otherwise stated. All rights are reserved.

You are responsible for complying with all applicable copyright laws. We permit you to make copies of information on Colebrook (SW) Ltd’s website as necessary incidental acts during your viewing. You may take a print, for your personal use, of as much of the site as is reasonable for private purposes. All other uses are prohibited. Nothing in these terms shall be construed as conferring any right to use any trademark, logo, patent right or copyright of Colebrook (SW) Ltd.

16.0 Your consent

By providing us with your personal information, including sensitive information such as medical details, you consent to the collection and use of this information in accordance with the purposes described in this policy.

Colebrook (SW) Ltd may be funded to provide local services which have specific contractual requirements on how data is used. Reference to these may be made on the individual Privacy Statement you are asked to sign when you first join us as a client, member, hirer, service user, volunteer or staff member.

If you complete a referral form, or contact us about a third party, we expect you to have the consent of the person concerned and, unless they lack capacity, we will need their consent to proceed further.

17.0 Links

Our websites may include links to websites run by other organisations. Colebrook (SW) Ltd is not responsible for the privacy practices of these other websites so you should read their privacy policies carefully.

18.0 Changes

If your personal details change, please help us to keep your information up to date by notifying your contact or other relevant staff member.

We may change the terms of this privacy policy from time to time. If we do so, we will publish the revised policy on the Colebrook (SW) Ltd website so please check from time to time. By continuing to use our websites you will be deemed to have accepted such changes.

19.0 Data Protection Regulator

Further information and advice about data protection is available from:

The Office of the Information Commissioner
Wycliffe House
Water Lane
Wilmslow
Cheshire SK9 5AF
Tel: 0303 123 1113

Website: www.ico.org.uk

20.0 Further information or specific requests

For further information or specific requests relating to this statement please contact:

Data Protection Officer
Colebrook (SW) Ltd
R/O Engage Southwest
St Levan Road
Plymouth
PL2 3BG

Tel: 01752 205210

E-mail: dpo@colebrooksw.org

We may require specific proof of identity to respond to you if making a subject access request. Please request a copy of the Subject Access Request Form.