

# **The Glenmore Trust**

## **Policies and Procedures**

### **Staff**

**Policy – Privacy Policy**

**Created: July 2022**

**Reviewed: January 2023**

**Review Scheduled: January 2024**

## **THE GLENMORE TRUST**

### **PRIVACY POLICY**

#### **1. INTRODUCTION**

The Glenmore Trust (the **Trust**) respects your privacy and is committed to protecting your personal data. This privacy policy will inform you about how we look after your personal data and about your privacy rights and legal protections.

It applies to information we collect or process in relation to:

- Our service users;
- Users of our website;
- Subscribers to our newsletter or other publications;
- Attendees at our events or training; and
- Interactions with us via any medium (eg by post, email, telephone, our website or social media).

It is important that you read this privacy policy together with any other privacy policy or fair processing policy we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This privacy policy supplements other notices and privacy policies and is not intended to override them.

#### **2. IMPORTANT INFORMATION AND WHO WE ARE**

##### **Controller**

The Trust is the controller and responsible for your personal data (collectively referred to as the Trust, "we", "us" or "our" in this privacy policy). We are a registered society under the Co-operative and Community Benefit Societies Act 2014. Our registration number is 28357R.

We have appointed an Information Security Officer who is responsible for overseeing questions in relation to this privacy policy. If you have any questions about this privacy policy or data protection, including any requests to exercise your legal rights, please contact the Information Security Officer. His contact details are the same as for those for the Trust which are set out below.

##### **Contact details**

Full name of legal entity: The Glenmore Trust

Email address: enquiries@glenmore.org

Postal address: 9 Northumberland Street, Denton Holme, Carlisle, Cumbria, CA2 5HD

Telephone number: 01228 522448

##### **Changes to the privacy policy and your duty to inform us of changes**

We keep our privacy policy under regular review.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

##### **Our website**

Use of our website is governed by our Terms of Website Use which are available to view on the website <https://www.glenmore.org/images/terms-of-use.pdf>. Information about the cookies we use on our

website is set out under Section 4 below.

Our website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy policy of every website you visit.

### 3. THE DATA WE COLLECT ABOUT YOU

#### Type of Data

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data). We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

- **Identity Data** includes name, username or similar identifier, marital status, title, date of birth and gender.
- **Contact Data** includes addresses, email address and telephone numbers.
- **Financial Data** includes bank account and payment card details.
- **Transaction Data** includes details about payments to and from you and other details of services you have purchased from us.
- **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 our website.
- **Profile Data** includes your username and password, purchases or orders made by you, your interests, preferences, feedback and survey responses.
- **Usage Data** includes information about how you use our website and services.
- **Marketing and Communications Data** includes your preferences in receiving marketing from us and our third parties and your communication preferences.
- **Image Data** includes any photograph, video or other image of you.

#### Special Categories of Personal Data

We will only process Special Categories of your personal data (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health, and genetic and biometric data) in certain situations in accordance with the law. For example, we can do so if we have your explicit consent. If we asked for your consent to process a special category of personal data then we would explain the reasons for our request. You do not need to consent and can withdraw consent later if you choose by contacting the Information Security Officer.

We do not need your consent to process Special Categories of your personal data when we are processing it for the following purposes, which we may do:

- where the processing is necessary for the provision of health or social care or treatment;
- where the processing is necessary for the management of health or social care systems and services;

- where it is necessary to protect your vital interests or those of another person where you where you/they are physically or legally incapable of giving consent;
- where the data is public; and
- where processing is necessary for the establishment, exercise, or defence of legal claims.

### **Criminal Convictions Personal Data**

In some circumstances we may hold information about criminal convictions. We will only do so where we are legally able to do so. We are allowed to use your personal information in this way:

- where the processing is necessary for the provision of health or social care or treatment;
- where the processing is necessary for the management of health or social care systems and services.

### **Aggregated Data**

We also collect, use and share Aggregated Data such as statistical or demographic data for any purpose. Aggregated Data could be derived from your personal data but is not considered personal data in law as this data will not directly or indirectly reveal your identity. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy policy.

### **No profiling or use of automated decisions**

We do not take automated decisions about you using your personal data or use profiling in relation to you.

### **If you fail to provide personal data**

Where we need to collect personal data by law, or under the terms of a contract we have with you, and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with services). In this case, we may have to cancel a service you have with us but we will notify you if this is the case at the time.

## **4. HOW IS YOUR PERSONAL DATA COLLECTED?**

We use different methods to collect data from and about you including through:

### **Direct interactions**

You may give us your Identity, Contact and Financial Data by filling in **Microsoft Forms** or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:

- apply for or receive our services;
- subscribe to our publications;
- request marketing to be sent to you; or
- give us feedback or contact us.

## Automated technologies or interactions and Cookies

As you interact with our website, we will automatically collect certain Technical Data about your equipment and preferences. We collect this personal data by using cookies. A cookie is a small file of letters and numbers that we store on your browser or the hard drive of your computer if you agree. Cookies contain information that is transferred to your computer's hard drive.

We use the following types of cookie:

**Strictly necessary cookies.** These are cookies that are required for the operation of our website. They include, for example, cookies that enable us to ask for your Cookie preferences.

**Functionality cookies.** These are used to recognise you when you return to our website. This enables us to remember your Cookie preferences for the next time you visit the website.

You can find more information about the individual cookies we use and the purposes for which we use them in the table below:

Cookie Title Cookie Name	Purpose	Expiry
EB Sticky Cookie notice	This cookie enables us to remember a user's consent to the use of the cookie	30 days after session expiry or on deletion by a user of his/her computer cache
Google Analytics	Record information such as the pages you visit, your browser type and your location. This does not record personal information	On leaving the website
CQC	To show Care Quality Commission rating widget	On leaving the website

We do not share the information collected by the cookies with any third parties.

You can choose which functionality cookies we can set by clicking on the button(s):

Strictly essential cookies **OFF**

Functionality cookies **OFF**

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of our website may become inaccessible or not function properly.

### Third parties or publicly available sources

We may receive personal data about you from various third parties as set out below:

- Identity, Contact , Usage Data, Transaction Data or Special Category Data from the NHS, Care Quality Commission, Adult Social Care or social care landlords, housing associations and similar authorities or agencies in connection with services that we may provide to you.

- Identity, Contact or Criminal Convictions Data which we receive from the police and other law enforcement agencies in connection with services that we may provide to you.
- Contact, Financial and Transaction Data from providers of technical, payment and delivery services.
- Contact, Financial and Transaction Data from letting agents for the purposes of assisting clients to obtain references.

## 5. HOW WE USE YOUR PERSONAL DATA

### Use of your personal data

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- Where we need to perform the contract we are about to enter into or have entered into with you.
- Where it is necessary for our legitimate interests (or those of a third party) by which we mean in the interest of our business in conducting and managing our business, to enable us to give you the best service and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law).
- Where we need to comply with a legal obligation.

Generally, we do not rely on consent as a legal basis for processing your personal data although we will get your consent before sending third party direct marketing communications to you via email or text message. You have the right to withdraw consent to marketing at any time by contacting us.

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us. If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

### Purposes for which we will use your personal data

We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

Purpose/Activity	Type of data	Lawful basis for processing
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		<b>including basis of legitimate interest</b>
Provision of services pursuant to a contract with a service user	(a) Identity (b) Contact (c) Special Category (d) Criminal Convictions Data	(a) and (b) Performance of a contract with you  (c) and (d) Necessary for the provision of social or health care treatment or the management of health or social care systems or services
Provision of services pursuant to a contract with a local authority in connection with services provided to service users	(a) Identity (b) Contact (c) Special Category (d) Criminal Convictions Data	(a) and (b) Necessary for our legitimate interests (to fulfil a contractual obligation and promote and discharge our charitable and community benefit objectives)  (c) and (d) Necessary for the provision of social or health care treatment or the management of health or social care systems or services
To report to, or submit to audits by, authorities or agencies in respect of services provided to service users	(a) Identity (b) Contact (c) Usage (d) Special Category (e) Criminal Convictions Data	(a) to (c) Necessary to comply with a legal obligation  (d) and (e) Necessary for the provision of social or health care treatment or the management of health or social care systems or services
To create and maintain treatment, service usage and other records for individual service users	(a) Identity (b) Contact (c) Usage (d) Special Category (e) Criminal Convictions Data	(a) to (c) Performance of a contract with you  (a) to (c) Necessary to comply with a legal obligation  (d) and (e) Necessary for the provision of social or health care treatment or the management of health or social care systems or services
Promotion or advertising of our services on our website or in other marketing material we may produce through the collection and processing of photographs, video or other images of you	Image	Consent
To process and deliver our services to service users:  (a) Manage payments, fees and	(a) Identity (b) Contact	Performance of a contract with you  Necessary for our legitimate interests (to recover debts due to us)

charges  (b) Collect and recover money owed to us	(c) Financial  (d) Transaction  (e) Marketing and Communications	
To manage our relationship with you which will include:  (a) Notifying you about changes to our terms or privacy policy  (b) Asking you to leave a review or take a survey	(a) Identity  (b) Contact  (c) Profile  (d) Marketing and Communications	Performance of a contract with you  Necessary to comply with a legal obligation  Necessary for our legitimate interests (to keep our records updated and to study how our services are utilised, to develop them and promote and discharge our charitable and community benefit objectives)
To administer and protect our charitable and community benefit activities and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	(a) Identity  (b) Contact  (c) Technical	Necessary for our legitimate interests (for running our operations, provision of administration and IT services, network security, to prevent fraud and in the context of a reorganisation or group restructuring exercise)  Necessary to comply with a legal obligation
To deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you	(a) Identity  (b) Contact  (c) Profile  (d) Usage  (e) Marketing and Communications  (f) Technical	Necessary for our legitimate interests (to study how our services are utilised, to develop them and promote and discharge our charitable and community benefit objectives and to inform our marketing strategy)
To make suggestions and recommendations to you about services that may be of interest to you	(a) Identity  (b) Contact  (c) Technical  (d) Usage  (e) Profile  (f) Marketing and Communications	Necessary for our legitimate interests (to develop our services and promote and discharge our charitable and community benefit objectives)



## **Marketing**

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising. We may use your Identity, Contact, Technical, Usage and Profile Data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which products, services and offers may be relevant for you (we call this marketing).

You will receive marketing communications from us if you have requested information from us or we have provided services to you and you have not opted out of receiving that marketing.

### **Third-party marketing and Opting Out**

We will get your express opt-in consent before we share your personal data with any third party for marketing purposes.

You can ask us or third parties to stop sending you marketing messages at any time by contacting us.

Where you opt out of receiving these marketing messages, this will not apply to personal data provided to us as a result of a service provision.

## **6. DISCLOSURES OF YOUR PERSONAL DATA**

We may share your personal data with the parties set out below for the purposes set out in the table in section 5 above.

- Service providers who provide IT and system administration services to the Trust.
- Professional advisers including financial advisers, lawyers, health and safety advisers, medical professionals, bankers, auditors and insurers who provide financial, consultancy, banking, legal, insurance, health and safety, and accounting services.
- Government departments, local authorities, law enforcement agencies and similar organisations including HM Revenue & Customs and the Department for Work and Pensions and the police.
- Regulators and other authorities, including the Care Quality Commission.
- The NHS.
- Adult Social Care within your local council.
- Social care landlords.
- Third parties involved in dealing with financial, pension or benefit-related issues, such as pension administrators, brokers, company registrars.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

## **7. INTERNATIONAL TRANSFERS**

We do not transfer your personal data outside the UK.

## **8. DATA SECURITY**

We have put in place appropriate security measures to prevent your personal data from being

accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

## 9. DATA RETENTION

### How long will you use my personal data for?

We will only retain your personal data for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

To determine the appropriate retention period for personal data, we consider the amount, nature and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal, regulatory, tax, accounting or other requirements.

Details of retention periods for different aspects of your personal data are available from the Information Security Officer.

In some circumstances we will anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes, in which case we may use this information indefinitely without further notice to you.

## 10. YOUR LEGAL RIGHTS

Under certain circumstances, you have rights under data protection laws in relation to your personal data as follows:

- **Request access** to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.
- **Request correction** of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.
- **Request erasure** of your personal data. This enables you to ask us to delete or remove personal data 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 data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.
- **Object to processing** of your personal data 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 as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

- **Request restriction** of processing of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios:
  - If you want us to establish the data's accuracy.
  - Where our use of the data is unlawful but you do not want us to erase it.
  - Where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims.
  - You have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.
  
- **Request the transfer** of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.
  
- **Withdraw consent** at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

If you wish to exercise any of the rights set out above, please contact the Information Security Officer. In order to assist us deal with your request more efficiently, please submit requests in writing or by email where possible.

### **Complaints**

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK regulator for data protection issues ([www.ico.org.uk](http://www.ico.org.uk)). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact the Information Security Officer in the first instance.

### **No fee usually required**

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

### **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 your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

### **Time limit to respond**

We try to respond to all legitimate requests within one month. Occasionally it could take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.