

## Privacy Notice - Website

At Centre 404 we are aware of the importance of keeping your personal data safe and secure and because of this comply with the GDPR and The Data Protection Act 2018. We appreciate that when you share your data with us you trust us to look after it. Our Centre 404 Privacy notice describes to you:

1. Who we are?
2. What personal data we need & how we collect it?
3. What we do with your personal data?
4. Who has access to the data that we hold?
5. How do we store your data?
6. How long we hold your information for?
7. Your rights and how to exercise them?
8. Changes to this privacy notice
9. How to contact us and complain?

Additional privacy policies exist for colleagues, for people we support, for job applicants, for volunteers and for family members of people we support. These complement the information in this privacy policy.

### 1. Who we are?

Centre 404 is a registered charity that offers friendly, reliable and person centred support to people with a learning disability and their families in North London. Reg. No: 299889 regulated by the Charities commission.

Centre 404 is the Data Controller when processing your data. "Processing" can mean collecting, recording, organising, storing, sharing or destroying data.

The Data Protection contact (person responsible for maintaining records of personal data and data processing activity) is The Director of People and Resources.

### 2. What personal data we need and how we collect it?

So that we can provide a safe and professional service, we need to keep certain records about you and your family. We may record the following types of data about you and in some instances your friends and family :

- Basic details and contact information e.g. name, address, date of birth and next of kin;
- Financial details e.g. details of how you pay us for your care or your funding arrangements.
- Support documents which will include: life story; support information; health information; risk assessments; goals; hobbies and activities; Incident reports; money records

We also record the following data which is classified as "special category":

- Health and social care data , which might include both your physical and mental health data.
- We may also record data about race, ethnic origin, sexual orientation or religion.

Centre 404 only collects relevant and necessary information.

### **How we collect your data?**

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

- Where there is a contract in place (this is when you become a member) and we process the personal data in the administration of entering into or maintaining this contract.
- Where it is in the legitimate interest of yourself and the charity.
- Where we are using Vital Interests (generally this would be in safeguarding interests)
- Where we have a legal obligation to do so – under the Health and Social Care Act 2014 and Mental Capacity Act 2005.
- Where we are required to do so in our performance of a Public Interest for example we are required to provide data to our regulator, the Care Quality Commission (CQC)
- When you give consent on our application forms or website contact form for us to send you relevant additional services information. Remember whenever you give us consent you are in control of how we contact you, and if you would like to unsubscribe at any time we provide the information on how you do this easily.

Personal Data is taken through the following channels:

1. Face to Face
2. Phone
3. Email
4. Post
5. Website contact forms

Analytic tracking tools also collect anonymous information across our website and social media channels. This data is used only to improve user experience and is never shared.

Information we collect via social media channels is dependent on what you share with us. We may access publicly available details on your profile to get more, relevant information about you.

### **3.What do we do with your personal data?**

Without this information it would be difficult for Centre 404 to provide you with our support services - which is our prime purpose. We do not use your data for purposes other than for that purpose. None of your data is passed on to third parties for direct marketing purposes. If we would like to use your data then we will always ask for your permission before we do so.

### **4.Who also has access to the data we hold?**

We will not share your details with any third party without explaining that we are doing so unless we have a legal responsibility. These may be where:

- a child is at risk of harm
- a vulnerable adult is at risk of harm

- you are at serious risk of immediate harm
- we have been ordered to share information with the courts
- a person poses a serious risk to others

In all of these cases, we will perform a risk assessment to document why we are required to share personal data and what data we need to share. We will keep you informed wherever we are able to.

Third party organisations we have a legal reason to share your data with may include:

- Other parts of the health and care system such as local hospitals, the GP, the pharmacy, social workers, clinical commissioning groups, and other health and care professionals;
- The Local Authority;
- Organisations we have a legal obligation to share information with i.e. for safeguarding, the CQC;
- The police or other law enforcement agencies if we have to by law or court order.

Other third parties that have access to personal data which enable Centre 404 to offer our services may include:

Technical Support Services  
Website Providers

Centre 404 as the Data Controller ensures that our third party providers have strict adherence to Data Protection laws and that we have relevant data sharing contracts in place with each relevant third party. We cannot hold responsibility for the actions of 3rd parties, but can provide a list of our providers.

### **5.How do we store your data?**

Centre 404 is responsible for keeping your personal information safe and secure. We use rigorous internal procedures when we collect your personal information in order to prevent unauthorised access.

No data transmission over the internet is 100% secure and although we try to protect your personal information Centre 404 cannot guarantee the security of any information you transmit to us and you do so at your own risk.

We have appropriate technical controls in place to protect your personal details. This includes password protection, encryption, secure databases, and lock and key,

We have assessed which staff and which peer-to-peer volunteers require access to what type of data and that they are properly trained and supported to manage this use and security.

The charity regularly reviews its arrangements for physical and IT security, ensuring these remain aligned to industry leading practice and continue to robustly safeguard personal data, protecting against its unauthorised access or misuse.

### **6.How long do we hold your data for?**

We will keep your data for as long as is necessary for Centre 404 to fulfil the purpose of the charity. The charity keeps a processing and retention record which gives our specific retention information for each category of data.

## **7. Your rights and how to exercise them**

### **Access to your personal data and data portability**

You have the right to access and receive a copy of the personal information we hold about you, this is called a 'Subject Access Report.' This will provide you with all personal data we hold about you, subject to some limited exemptions for example, you will not necessarily be entitled to access third party information.

You also have the right to data portability. Under this right for information you can request that your personal data is provided to you (or another organisation) in a portable, electronic format.

### **Change, restrict, delete**

You may also have rights to change, restrict the use of, or delete your personal information. Unless there is an exceptional circumstance (like where we are required to store personal information for legal reasons) we will generally delete your personal information.

### **Object**

You can object to us processing your information based on our legitimate interests. In such cases, we will delete your personal information within a month of receipt of the objection, unless we have compelling and legitimate grounds to continue using that information or if it is needed for legal reasons.

When exercising any of the above rights you may need to provide adequate information for our staff to be able to identify you, for example a passport or drivers licence. This is to make sure that data is not shared with the wrong person inappropriately.

Under the Data Laws we will respond to your requests as soon as possible and at the latest within one month.

## **8. Changes to this Privacy Notice**

Centre 404 reserves the right to amend this notice at any time in line with legislation changes. This Privacy Notice was last updated March 2021.

## **9. How to contact us & complain**

Should you be unhappy with how we are handling your data we would hope that you will contact us first at: Data Contact address Centre 404 404 Camden Road, London N7 OSJ . Email [general@centre404.org.uk](mailto:general@centre404.org.uk)

Alternatively you can contact the Supervisory Authority which is the Information Commissioner's Office:

Information Commissioner's Office

Wycliffe House

Water Lane

Wilmslow

Cheshire

SK9 5AF

<https://ico.org.uk/global/contact-us/>