



## **Overarching Privacy Notice**

### **North East Lincolnshire Women's Aid**

North East Lincolnshire Women's Aid is a charity which provides support and accommodation for those who may be experiencing or have experienced domestic abuse. To be able to support those requesting our service, we have to hold and process personal data. To be able to function as a service, we hold information on staff, volunteers and those that support us through information sharing and fundraising.

In line with the General Data Protection Regulation 2018 (GDPR) we wish to inform everyone we will be transparent, fair and lawful and only use information shared for the purpose with which you have consented. We want to explain to you what can be expected from us when information is shared with us.

#### **What is a data controller?**

A DATA CONTROLLER is the person who (either alone, jointly or in common with other persons) determines the purposes and the manner in which any personal data is to be processed.

PROCESSING means any operation which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

North East Lincolnshire Women's Aid is the Data Controller in this instance.

#### **What is personal data?**

PERSONAL DATA means any information relating to an identified or identifiable person (The data subject) an identifiable person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that person.

SPECIAL CATEGORIES OF PERSONAL DATA relates to racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, and the processing of genetic data, biometric data for the purpose of uniquely identifying a person, data concerning health or data concerning a natural person's sex life or sexual orientation.

Whenever possible we will always look to use, anonymised data rather than using identifiable personal data.

## How do we process your information?

When processing your personal data we will at all times comply with our obligations under the General Data Protection Regulation and other data protection law. These obligations are there to protect you and ensure that we:

- Process your personal data lawfully, fairly and in a transparent manner;
- Collect your personal data for specified, explicit and legitimate purposes and do not process it for further purposes that are incompatible;
- Ensure that the personal data we process is adequate, relevant and limited to what is necessary for the processing purpose;
- Ensure your personal data is accurate and, where necessary, kept up to date;
- Keep your personal data for no longer than is necessary;
- Keep your personal data protected and secure. To do this we have put in place appropriate organisational and technical measures, to prevent any unauthorised/accidental loss or destruction of data and to ensure it is only accessed by those authorised to do so in the performance of their duties.

## What information do we collect from you?

We only ask for the information which will be relevant to the reason you are giving it. This may be personal details to allow us to register you as a staff member, volunteer, gift aid donor, fundraiser or service user. We will not ask for any information that is not relevant, fair or lawful.

## When we ask for information we make sure you know how it will be used.

We will use your personal data for the following purposes and at all times in accordance with our data protection obligations, including:

- Where you have consented to or asked us to process your data for a particular purpose;
- To deliver our services effectively and efficiently to you including communicating with you and confirming your identity;
- When you use our website (please ask for our [cookie policy](#) and [terms and conditions](#));
- To meet our statutory obligations;
- For employment purposes and duties;
- To identify and protect those at risk of harm;
- To respond in the event of an emergency;
- We may use your explicit information, in a way that doesn't directly identify you, to help us research demand, demographics and other special categories for statistical purposes;
- On your request, to inform you of events and information on our services.

Where permission has been given, we, or in some instances, a trusted partner agency may contact you to ask you for feedback on the service you received and your overall experience of North East Lincolnshire Women's Aid. We will not sell your information to any external organisations.

## How will we look after your information?

We collect and store all information you give us securely either using our approved information management system (Oasis), locked storage or secure archives. We understand the importance of protecting your information and will not share it with any other party unless we have your permission to do so or for safeguarding, health or lawful reasons.

## Sharing your information.

Depending on the purpose for which we originally obtained your personal data and the use to which it is to be put, we may share or disclose your personal data with others. For example:

- To comply with our legal obligations or as permitted by the General Data Protection Regulation;
- With partner organisations that support the delivery of the services you receive;
- With specialist services where support is needed which we cannot offer through our domestic abuse service;
- For the purpose of the prevention and / or detection of crime;
- When it is in your vital interests or that of another person; or when you have asked us to do so;
- If we are instructed to do so by law or it is right and necessary to do so.

We will only share your personal data if we are satisfied that the recipient has sufficient measures in place to protect your information in the same way that we do, and when sharing your information we will only share the minimum necessary.

We will never share or sell your personal data for marketing purposes.

Keeping information safe and being aware of the importance of confidentiality is paramount. We take the use of the information very seriously and ensure permission has been given for it to be used for that purpose. We wish to reassure you we will, at all times, adhere to the GDPR 7 principles. NEL Women's Aid are responsible for keeping your information safe.

## What is our legal basis for processing your personal data?

The purpose for which we use your personal data will determine our legal basis for processing it. Generally, the legal basis for processing will be one of the conditions set out in Articles 6 and 9 of the General Data Protection Regulation, the main ones of which are:

1. To perform a task or provide a service carried out in the public interest (Article 6 1 (e));
2. To comply with a legal obligation (Article 6 1 (c));
3. The processing is necessary for the performance of a contract to which you are a party or in order to take steps at your request prior to entering into a contract (Article 6 1 (b));
4. The processing or disclosure is in your vital interests or of another person (Articles 6 1 (d) and 9 2 (c));
5. The processing is necessary for the establishment, exercise or defence of legal claims or whenever courts are acting in their judicial capacity (Article 9 2 (f)); or
6. You have given your explicit consent (Articles 6 1 (a) and 9 2 (a)).

## What rights do you have with regards to the information shared with us?

Under the General Data Protection Regulation 2018, you have the following rights in relation to your personal data;

- **Access** – You can ask us for the personal data we hold about you (a Subject Access Request) and for details about how that data has been used. To make a valid Subject Access Request you must apply in writing. We must respond to this request within 30 days.
- **Rectification** – You can ask for inaccurate data to be corrected, incomplete data to be completed or a supplementary statement to be attached to your information.
- **Erase** – You may request we delete any data we hold about you. It may be deleted if legislation and our retention schedules no longer require us to hold it. To erase information you must apply for “Right to be forgotten”. This request may be overruled if it means removing information which may be needed for safeguarding or legal reasons.

- **Data Portability** – In certain circumstances, you can ask us for copies of the data we hold about you in an electronic format. For further details see Article 20.
- **Objection** – You can ask us to stop processing your personal data in certain circumstances. For further details see Article 21.
- **Complain** – In the first instance please send your complaint, in writing, to The Chief Officer, NEL Women's Aid. You may also make a complaint to the Information Commissioner's Office if you are unhappy with how we have processed your personal data.
- **Accountability** – We, as a Data Controller, need to prove that we are responsible for and are able to demonstrate compliance with the other 6 principles.

### Do I have to give my consent for you to use information about me?

Yes. To be able to offer you a service or for legal reasons we have to ask for specific information. You can decide exactly what "special category personal data" you wish to share. This could be race, ethnicity, age, gender etc. We will only use this information because we have a 'legitimate interest' to do so. This may be providing you with a service, registering contacts for your safety or carrying out beneficial, relevant research.

For more information or to read the General Data Protection Regulation 2018, including the articles referred to in this Privacy Notice open the following link - <https://gdpr-info.eu/>

If you require more information or you would like to be removed from one of our mailing lists - please email [denise@womensaidnel.org](mailto:denise@womensaidnel.org) or call Women's Aid on 01472 575757