

## NEW START HIGHLAND PRIVACY POLICY

### 1) Introduction

This Privacy Policy applies to information which New Start Highland collects about individuals who interact with our organisation. It explains what personal information we collect and how we use it.

### 2) Personal Data That We Process

The following table explains the types of data we collect and the legal basis, under current data protection legislation, on which this data is processed.

<b>Purpose</b>	<b>Data (Key Elements)</b>	<b>Basis</b>
General enquiries about our organisation and its work.	Name, e-mail address, message.	Legitimate interests ie it is necessary for us to read and store your message so that we can respond appropriately.
Commercial Training	Name, address, contact details, date of birth, gender, nationality, ethnicity, special needs	Information requested by awarding bodies ie ITC, ITSSAR. The information is also retained for certification and invoicing requirements.
Employability Training and Volunteering	Name, address, contact details, date of birth, referral form, support needs, criminal justice information, initial assessment and risk assessments, information sharing consent forms, support plan, eligibility information, review forms, client database.	To enable a high quality employability service to be delivered, a full picture of client needs is necessary. The information held is subject to audit under the terms of contracts with funders.
Housing Support	Name, address, contact details, date of birth, referral form, NI number, rent and benefits information, support needs, criminal justice information, initial assessment, risk assessment, information sharing consent form, review	To enable a high quality housing support service to be delivered, it is important that a full picture of client needs are available. Best practice standards set by the Care Inspectorate and Social Services Council require that

	forms, MPR, client database, correspondence from other agencies, incident reports.	this information is gathered. The information is also retained to comply with the terms of the contractual requirements relative to the Highland Council Housing Support Framework agreement.
Finance	Board member details.  Credit card slips from retail outlets.  The following information needs to be held in order to participate in the Gift Aid Scheme ; Name, address, contact details.	Required for Companies House and OSCR. To comply with Audit requirements.  To comply with HMRC'S Gift Aid Scheme.
Logistics	Name, address, contact telephone numbers, e-mail address	Collection details are required to ensure collections are carried out correctly and are retained for audit purposes. Delivery details are required as part of a Framework Agreement with Highland Council. They are retained for monitoring and audit purposes relating to this contract.
Removals	Name, address, contact details	Legitimate interests in order to fulfil customer requirements.

### 3) How We Use Your Data

We will only use your data in a manner that is appropriate considering the basis on which that data was collected, as set out in the table at the top of this policy.

### 4) When We Share Your Data

We will only pass your data to third parties in the following circumstances:

- you have provided your explicit consent for us to pass data to a named third party;
- we are using a third party purely for the purpose of processing data on our behalf and we have in place a data processing agreement with that third party that fulfils our legal obligations in relation to the use of third party data processors ; or
- we are required by law to share your data.

In addition, we will only pass data to third parties outside of the EU where appropriate safeguards are in place as defined by Article 46 of the General Data Protection Regulation.

## **5) How Long We Keep Your Data**

We take the principles of data minimisation and removal seriously and have internal policies in place to ensure that we only ever ask for the minimum amount of data for the associated purpose and delete that data promptly once it is no longer required.

Where data is collected on the basis of consent, we will seek renewal of consent at least every three years.

## **6) Rights You Have Over Your Data**

You have a range of rights over your data which include the following ;

- where data processing is based on consent, you may revoke this consent at any time and we will make it as easy as possible for you to do this ;
- you have the right to ask for rectification and / or deletion of your information ;
- you have the right of access to your information;
- you have the right to lodge a complaint with the Information Commissioner if you feel your rights have been infringed.

A full summary of your legal rights over your data can be found on the Information Commissioner's website (<https://ico.org.uk/>)

If you would like to access the rights listed above, or any other legal rights you have over your data under current legislation, please get in touch with us.

Please note that relying on some of these rights, such as the right to delete your data, will make it impossible for us to continue to deliver some services to you. However, where possible we will always try to allow the maximum access to your rights while continuing to deliver as many services to you as possible.

## **7) Modifications**

We may modify this Privacy Policy from time to time and will publish the most current version on our website. If a modification meaningfully reduces your rights, we will notify individuals whose personal data we hold.