

## Privacy Policy

# London Cyrenians Housing Ltd (LCH)



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We want you to feel confident and comfortable with how any personal information you share with us will be looked after or used. This Privacy Policy sets out how we collect, use and store your personal information (this means any information that identifies or could identify you).

## 1.0 WHO WE ARE

LCH are committed to protecting your personal information and making every effort to ensure that your personal information is processed in a fair, open and transparent manner. We are a "data controller" for the purposes of the Data Protection Act 1998 and (from 25 May 2018) the EU General Data Protection Regulation 2016/679, which means that we are responsible for, and control the processing of, your personal information.

If you would like any further information about our privacy practices, please contact us at London Cyrenians Housing, 235 – 237 Vauxhall Bridge Road, London, SW1V 1EJ (020 7938 2004)

## 2.0 HOW WE COLLECT INFORMATION ABOUT YOU

We collect information from you in the following ways:

When you interact with us directly: This could be if we provide support to you, if you apply for a job or volunteering opportunity or otherwise provide us with your personal information. This includes when you phone us, email us, visit our website, or get in touch through the post, or in person. This may also include CCTV footage of you, if you visit one of our sites.

When you interact with us through partners or suppliers working on our behalf: This could be if you access a service such as Disclosure Services, which is delivered through a trusted organisation working on our behalf and always under our instruction.

When you interact with us through third parties: This could be if you are referred to us through a third party such as a Local Authority or one of the other third parties that we work with and provide your consent for your personal information to be shared with us.

## 3.0 INFORMATION WE COLLECT AND WHY WE USE IT

### Personal Information

Personal information we collect includes details such as your name, date of birth, email address, postal address, telephone number and bank details (if you are an employee), as well as information you provide in any communications between us. You will have given us this information whilst applying to us for support, or for work, or any of the other ways you interact with us.

We will mainly use this information:

- To provide the support that you have requested.
- To update you with important information.
- To keep a record of your relationship with us.
- Where you work with us, to manage your employment with us.

If you do not provide this information, we will not be able to provide you with support or employ you.

## **Sensitive Personal Information**

Some categories of personal information are more sensitive, including information about a person's health, race, ethnic origin, political opinions, sex life, sexual orientation, trade union membership, religious beliefs, actual or alleged criminal convictions. If you share this information with us, we will treat it with extra care and confidentiality and always in accordance with this Privacy Policy.

We will only use this information to deal with your support or employment, or for legal requirements.

We will not pass on your details to anyone else without your express permission except in exceptional circumstances. Examples of this might include anyone reporting serious safeguarding concerns.

Where you have given us your express consent or otherwise clearly indicated to us that you are happy for us to share your experiences of your support or work with us, then we may publish it in our newsletter, on our website, or in other media.

## **4.0 LEGAL BASIS FOR USING YOUR INFORMATION**

In some cases, we will only use your personal information where we have your consent or because we need to use it in order to fulfil a contract with you (e.g. if you work for us). However, there are other lawful reasons that allow us to process your personal information and one of those is called 'legitimate interests'. This means that the reason that we are processing information is because there is a legitimate interest for LCH to process your information to help us to achieve our aim of supporting vulnerable people.

Whenever we process your Personal Information under the 'legitimate interest' lawful basis we make sure that we take into account your rights and interests and will not process your personal information if we feel that there is an imbalance.

Some examples of where we have a legitimate interest to process your Personal information are where we aim to improve our services, for our legal purposes (for example, dealing with complaints and claims), or for complying with the requirements of our commissioners and inspectors.

We may also process your data to meet our legal obligations and to perform tasks in the public interest, or for our official functions, and to protect the vital interests of an individual.

## **5.0 SHARING YOUR INFORMATION**

The personal information we collect about you will mainly be used by our staff at LCH so they can support you.

We will never sell or share your personal information with organisations so that they can contact you for any marketing activities, or sell any information about your web browsing activity.

However, we may share your information with our trusted partners and suppliers who work with us on or on our behalf to deliver our services, but processing of this information is

always carried out under our instruction. We make sure that they store the data securely, delete it when they no longer need it and never use it for any other purposes. For example, we use an external IT company to provide our systems, and external Occupational Health and Disclosure and Barring Service check providers.

We enter into contracts with these service providers that require them to comply with data protection legislation and ensure that they have appropriate controls in place to secure your information.

We may disclose your information if required to do so by law (for example, to comply with applicable laws, regulations and codes of practice or in response to a valid request from a legal authority). This may include CCTV footage of you.

## **6.0 KEEPING YOUR INFORMATION SAFE**

We take looking after your information very seriously. We've implemented appropriate physical, technical and organisational measures to protect the personal information we have under our control, both on and off-line, from improper access, use, alteration, destruction and loss.

Unfortunately the transmission of information using the internet is not completely secure. Although we do our best to protect your personal information sent to us this way, we cannot guarantee the security of data transmitted to our site.

Our website may contain links to other sites. While we try to link only to sites that share our high standards and respect for privacy, we are not responsible for the content or the privacy practices employed by other sites. Please be aware that websites that have links on our site may collect personally identifiable information about you. This privacy statement does not cover the information practices of those websites or advertisers.

## **7.0 HOW LONG WE HOLD YOUR INFORMATION FOR**

We only keep it as long as is reasonable and necessary for the relevant activity.

## **8.0 YOUR RIGHTS**

You have various rights in respect of the personal information we hold about you – these are set out in more detail below. If you wish to exercise any of these rights or make a complaint, you can do so by contacting us at London Cyrenians Housing, 235 – 237 Vauxhall Bridge Road, London, SW1V 1EJ (020 7938 2004). You can also make a complaint to the Information Commissioner's Office - <https://ico.org.uk/>

**Access to your personal information:** You have the right to request access to a copy of the personal information that we hold about you, along with information on what personal information we use, why we use it, who we share it with, how long we keep it for and whether it has been used for any automated decision making. You can make a request for access free of charge. Please make all requests for access in writing, and provide us with evidence of your identity.

**Right to object:** You can object to our processing of your personal information 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. Please contact us as noted above, providing details of your objection.

**Consent:** If you have given us your consent to use personal information (for example, sharing your experiences on our website), you can withdraw your consent at any time.

**Rectification:** You can ask us to change or complete any inaccurate or incomplete personal information held about you.

**Erasure:** You can ask us to delete your personal information where it is no longer necessary for us to use it, you have withdrawn consent, or where we have no lawful basis for keeping it.

**Portability:** You can ask us to provide you or a third party with some of the personal information that we hold about you in a structured, commonly used, electronic form, so it can be easily transferred.

**Restriction:** You can ask us to restrict the personal information we use about you where you have asked for it to be erased or where you have objected to our use of it.

**No automated-decision making:** Automated decision-making takes place when an electronic system uses personal information to make a decision without human intervention. You have the right not to be subject to automated decisions that will create legal effects or have a similar significant impact on you, unless you have given us your consent, it is necessary for a contract between you and us or is otherwise permitted by law. You also have certain rights to challenge decisions made about you. We do not currently carry out any automated decision-making.

Please note, some of these rights only apply in certain circumstances and we may not be able to fulfil every request.

## 9.0 MONITORING

Your communications with our teams (including by telephone or email) may be monitored and/or recorded for training, quality control and compliance purposes to ensure that we continuously improve our customer service standards.

To find out more about this policy and how we look after your personal information, contact us at London Cyrenians Housing, 235 – 237 Vauxhall Bridge Road, London, SW1V 1EJ (020 7938 2004).

## 10.0 EQUALITY IMPACT ASSESSMENT

10.1 This document forms part of LCH's commitment to create a positive culture of respect for all staff and service users. The intention is to identify, remove or minimise discriminatory practice in relation to the protected characteristics (race, disability, gender, sexual orientation, age, religious or other belief, marriage and civil partnership, gender reassignment and pregnancy and maternity), as well as to promote positive practice and value the diversity of all individuals and communities.

10.2 As part of its development this document and its impact on equality has been analysed and no detriment identified.