



# Privacy policy

## How we use personal data – information for users

**Important – This document replaces all other notices on this matter which you may have received from Centre 70 (also referred to as C70) previously**

The **General Data Protection Regulation (GDPR)** is effective from May 25, 2018.

Under GDPR, EU data subjects are entitled to exercise the following rights:

- **Right of Access:** Find out what kind of personal information is held about you and get a copy of this information.
- **Right of Rectification:** Ask for your information to be updated or corrected.
- **Right to Data Portability:** Receive a copy of the information which we have
- **Right to Restrict Use:** Ask for your personal information to stop being used in certain cases, including if you believe that the personal information about you is incorrect or the use is unlawful.
- **Right to Object:** Objecting to use of your information (where a party is processing it on legitimate interest basis) and to have your personal information deleted.
- **Right to Erasure:** In certain circumstances, you may also have your personal information deleted.

For further information on your rights, contact The Information Commissioner's Office [www.ico.gov.uk](http://www.ico.gov.uk)

**Controllers** determine how personal data is processed, **Processors** process personal data on behalf of a Controller, and data subjects are persons whose personal data is collected or used. Controllers within or outside of the EU are required to respond to requests from EU data subjects asking to exercise their rights.

**Centre 70 will process your personal information** where it is necessary to pursue our legitimate interests as part of running our Advice and Counselling services, in a way which might be reasonably expected and which does not materially impact your rights, freedom or interests. In other situations, we are required to obtain your consent to hold and process information about you. Likewise, most third parties with whom we communicate on your behalf, will similarly require consent to disclose personal information to us.

### Information we collect and why we do so

Centre 70 collects information from clients:

- Directly (given in person, over the phone or via email)
- Via our C70 registration forms
- eNews sign up form
- From others referring your case to us including landlords, organisations, health care professionals, support and keyworkers
- From persons who you have given authority to act on your behalf or persons with whom you are linked in the context of e.g. housing, joint debt, joint bank accounts, joint claims.

We record and process data about you only as required and for the following purposes:

- **Contact details** – to be able to contact you in relation to our services
- **Household and family member details** – to assess and progress cases, (and for reporting anonymous statistics to funders) and where needed to assess eligibility for Legal Aid funding
- **Details about your case** such as issues or services causing you problems - to assess, advise and progress your case.
- **Third party correspondence** – to assess, advise and progress your case

- **Medical details and health letters** – we will specially ask you for permission to record health details on file and permission to use in connection with the service we are providing. We will use this to assess, advise and progress your case, and to assess suitability for counselling and to allocate a counsellor. To ensure that we make reasonable adjustments in providing services. For us to monitor who uses our service and make improvements. For statistical purposes for funders.
- **Your financial details** including income/savings and assets and financial product details (eg Bank, Insurances, Utility Bills) – to assess eligibility for benefits. To see if eligible for Legal Aid. To assess and give and take appropriate advice and action (eg debt cases, preparation of financial statement, fees payable in counselling, discount and grant eligibility),
- **Monitoring information** (age, gender or gender definition, disability, ethnicity, religion or belief, sexuality, marital status or civil partnership status, nationality and immigration status, caring responsibility, class, pregnancy or maternity) – to ensure services are accessible to all. For statistical purposes for funders.

### **When we share information with other organisations**

With your permission, we may share your information with other organisations to help solve your problem, to monitor the quality of our services or for statistical purposes required by a funder, or to monitor, evaluate and improve our services, including:

- To progress your case, eg with creditors, landlords, Insolvency Service for Debt Relief Order
- It is a requirement of our funding to evidence non anonymised cases
- To apply for funding for your case in Legal Aid cases
- Quality control such as peer reviews where funders necessitate this. We will ask you to sign a separate consent for this
- Third parties who have referred you to C70 often require us to pass back information for tracking of the referral - where you provide permission to feedback on your case
- If we refer you to another organisation, we might share information about your problem with them so they can help you more quickly or appropriately

We will ensure that organisations we share your data with confirm they will store and use your data in line with data protection law including confidentiality, and that they have appropriate security measures in place. Where data is entered on a shared web based case recording system, such as MAP tool, CCMS, we will provide details and ask consent.

In some limited circumstances we may need to share your information without your permission, we'll always make sure there's a legal basis for this. This could include situations where we have to use or share your information:

- To comply with the law, called 'legal obligation' - for example, if a court orders us to share information
- To protect someone's life, called 'vital interests' - for example, sharing information with a paramedic if you are unwell
- To carry out our aims and goals as an organisation, called 'legitimate interests' - for example, to provide advice and counselling
- To defend our legal rights - for example, to resolve a complaint that we gave the wrong advice
- We need to do so to comply with the requirements, codes or recommendations of any of our regulators e.g. Financial Conduct Authority as part of a complaint
- Complying with Safeguarding obligations

### **Contacting Third Parties**

If we need to request data about you from a third party in order to provide the service to you e.g. to progress your case, assess for counselling, then we will ask you to sign an authority form. We will only use the authority form for the duration of the case or counselling or until when you withdraw that authority, if sooner. If you withdraw the authority that could affect the service, we can offer and how we can help you.

## **Security of your information**

Centre 70 will take reasonable precautions to prevent the loss, misuse or alteration of information you provide us. All staff and volunteers who access your data have had data protection training to make sure your information is handled sensitively and securely.

We store your information in case files and folders on a secure server and in our database and ensure only authorised access with individual log ins and passwords. Our data is backed up and we keep your personal data safe using strong passwords and encryption.

## **Where your data is processed**

Your data is stored and processed within the EEA with the exception of the list below. If we ever have to share your personal data with third parties and suppliers outside the European Economic Area (EEA) we will ensure they evidence compliance with GDPR.

We use MailChimp and Survey Monkey for our eNews and client surveys respectively. These applications store data in the United States but have taken steps to comply with GDPR and are both signed up to the EU-US Privacy Shield. Their privacy policies can be found <https://mailchimp.com/legal/privacy/> and [www.surveymonkey.com/mp/legal/privacy-policy/](http://www.surveymonkey.com/mp/legal/privacy-policy/)

## **Retention Periods**

We only keep your data for as long as is necessary for the purpose(s) for which it was provided. Normally this is for 6 years after your case or matter ends. This is because we are required to keep client files for that period by our Regulator and by some funders. For some cases we may decide that it is proper and appropriate to keep data for longer than 6 years, but we will notify you if we believe that your case falls into this category.

## **Your data, correction, deletion, change or preference**

We need the information we hold about you to be accurate and up to date. Please help us by informing us promptly of any changes to your personal circumstances or details.

Please get in touch with us at [manager@centre70.org.uk](mailto:manager@centre70.org.uk) or call 020 8670 0070 if you would like to exercise your right:

- To update your details
- To obtain a copy of the data we have for you
- To correct or update any information we hold about you
- To stop receiving information about our services or the medium we communicate that information
- To request deletion from our records
- If you have any questions

Please note that if you exercise your right to not provide certain information or ask for deletion of certain data, this may affect our ability to assess your eligibility for our service, conduct your case, provide information we are required to share with funders or for quality audit. In this situation, we will look at how best we can still assist you, but it may mean we may need to adjust how we assist you, or we may not be able to assist you further. We will provide an explanation if that situation arises.

## ***If you want to make a complaint***

If you're not happy with how we've handled your data, you can make a complaint [complaints@centre70.org.uk](mailto:complaints@centre70.org.uk). You can also raise your concern with the Information Commissioner's office <https://ico.org.uk/concerns/handling/>