

# **Privacy Notice for Customers**

In accordance with the General Data Protection Regulation (GDPR), we have implemented this privacy notice to inform you, as customers of our Company, of the types of data we process about you. We also include within this notice the reasons for processing your data, the lawful basis that permits us to process it, how long we keep your data for and your rights regarding your data.

### A) DATA PROTECTION PRINCIPLES

Under GDPR, all personal data obtained and held by us must be processed according to a set of core principles. In accordance with these principles, we will ensure that:

- a) processing is fair, lawful and transparent
- b) data is collected for specific, explicit, and legitimate purposes
- c) data collected is adequate, relevant and limited to what is necessary for the purposes of processing
- d) data is kept accurate and up to date. Data which is found to be inaccurate will be rectified or erased without delay
- e) data is not kept for longer than is necessary for its given purpose
- f) data is processed in a manner that ensures appropriate security of personal data including protection against unauthorised or unlawful processing, accidental loss, destruction or damage by using appropriate technical or organisation measures

g) we comply with the relevant GDPR procedures for international transferring of personal data

#### **B) TYPES OF DATA HELD**

We keep several categories of personal data on all out customers in order to carry out effective and efficient processes. We keep this data within our computer systems for example Mobizio and People Planner.

Specifically, we hold the following types of data:

- a) personal details such as name, address, phone numbers;
- b) name and contact details of your next of kin or people close to you;
- c) your gender, marital status, information of any disability you have or other medical information;
- d) information on your race and religion for equality monitoring purposes;
- e) information which was sent to us via a local authority.
- f) Sensitive information about you, risks associated, the support you require as well as your history, as well as ways you need to be supported.

#### C) COLLECTING YOUR DATA

We received this information either when the local authority referred you to us, or when you initially contacted us to request support.

In some cases, we will need to communicate with the local authority regarding you or your support.

#### D) HOW WILL THE DATA BE USED

Your data is added onto our systems which will enable us to add you onto our customer onboarding system, your information will then be used to create the relevant documents which will enable us to support you the safest and best way possible.

#### E) WHO WE SHARE YOUR DATA WITH

Your data is added onto our secure systems which relevant employees of JRH Support have access to.

#### F) PROTECTING YOUR DATA

We are aware of the requirement to ensure your data is protected against accidental loss or disclosure, destruction and abuse. We have implemented processes to guard against such.

# **G) RETENTION PERIODS**

We only keep your data for as long as we need it for.

Where you have provided consent to our use of your data, you also have the right to withdraw that consent at any time. This means that we will stop processing your data and there will be no consequences of withdrawing consent as set out in our Record Retention Policy.

#### H) How we protect your information

The information you provide will be subject to rigorous measures and procedures to make sure it is only accessible to the relevant staff.

We conduct assessment of private when making changes to processes or systems which will hold your personal information. We will always shred any paper documentation and will ensure only your information is saved on our secure systems.

We will investigate data incidents where we think information about you may have been disclosed inappropriately and will attempt to recover any data. We will inform the relevant authorities including yourself, unless we think it may present a risk to you.

#### I) YOUR RIGHTS

You have the following rights in relation to the personal data we hold on you:

- a) the right to be informed about the data we hold on you and what we do with it;
- b) the right of access to the data we hold on you. We operate a separate Subject Access Request policy and all such requests will be dealt with accordingly:
- c) the right for any inaccuracies in the data we hold on you, however they come to light, to be corrected. This is also known as 'rectification';
- d) the right to have data deleted in certain circumstances. This is also known as 'erasure';
- e) the right to restrict the processing of the data;
- f) the right to transfer the data we hold on you to another party. This is also known as 'portability';
- g) the right to object to the inclusion of any information:
- h) the right to regulate any automated decision-making and profiling of personal data.

In addition to the above rights, you also have the unrestricted right to withdraw consent, that you have previously provided, to our processing of your data at any time. Withdrawing your consent means that we will stop processing the data that you had previously given us consent to use. There will be no consequences for withdrawing your consent. However, in some cases, we may continue to use the data where so permitted by having a legitimate reason for doing so

If you wish to exercise any of the rights explained above, please contact our DPOJoanne Froggatt (see below)

## J) MAKING A COMPLAINT

If you think your data rights have been breached, you are able to raise a complaint with the Information Commissioner (ICO). You can contact the ICO at Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF or by telephone on 0303 123 1113 (local rate) or 01625 545 745.

# K) DATA PROTECTION COMPLIANCE

Our Data Protection Officer is: Paul Battershall

Tel. 0115 9856000