

General Privacy Notice: Hands Clients and other non-role holders

(This Notice is effective from 6 February 2025)

We take your privacy seriously and treat all the personal data you give us with great care.

This privacy notice explains how we collect, store and use the personal data you give us. If you have any questions concerning your personal data and how we look after it or you would like to update how you would prefer to hear from us, then please contact us. Our contact details are given at the end of the notice.

Your personal data – what is it?

"Personal data" is any information about a living individual which allows them to be identified from that data (for example a name, photographs, videos, email address, or postal address). The processing of personal data is governed by the Data Protection Bill/Act 2017, the General Data Protection Regulation 2016/679 (the "GDPR") and other legislation relating to personal data and rights such as the Human Rights Act 1998.

Who are we?

This General Privacy Notice is provided to you by Hands who is the data controller for your data. Hands is a registered charity (charity no. 1185942).

What personal data do we process?

Hands will process some or all of the following where necessary to perform our services:

- Names, titles, and aliases, photographs;
- Contact details such as telephone numbers, postal addresses, and email addresses;
- Where they are relevant to our work, or where you provide them to us, we may process demographic information such as gender, age, date of birth, marital status, nationality, education/work histories, academic/professional qualifications, hobbies, family composition, and dependents;
- Where you make donations or pay for activities, financial identifiers such as bank account numbers, payment card numbers, payment/transaction identifiers, policy numbers, and claim numbers;
- The data we process may include "sensitive personal data" as defined in the regulations

How do we process your personal data?

Hands will comply with our legal obligations to keep your personal data up to date; to store and destroy it securely; to not collect or retain excessive amounts of data; to keep personal data secure, and to protect personal data from loss, misuse, unauthorised access and disclosure and to ensure that appropriate technical measures are in place to protect personal data. We use your personal data for some or all of the following purposes:



- To provide you with Hands services should they be requested;
- To enable us to deliver Hands' services to our community, and to carry out any other voluntary or charitable activities for the benefit of our Clients as stated in the Hands constitution;
- To administer Hands' membership records;
- To enable us to meet all legal and statutory obligations;
- To carry out comprehensive safeguarding procedures (including due diligence and complaints handling) in accordance with best safeguarding practice from time to time with the aim of ensuring that all vulnerable adults are provided with safe environments;
- To promote the interests of Hands;
- To maintain our own accounts and records;
- To process a donation that you have made (including Gift Aid information);
- To seek your views or comments;
- To notify you of changes to our services, events and role holders;
- To send you communications which you have requested and that may be of interest to you. These may include information about Hands events, meetings and social occasions.
- To process a grant or application for a role;

What is the legal basis for processing your personal data?

Most of our data is processed because it is necessary for our legitimate interest, or the legitimate interest of a third party. An example of this would be the voluntary service we provide clients who have directly requested our support, or where the request has been made on their behalf by a family member or a third party involved in their care.

We will also use this basis to send you, by addressed mail, newsletters about the recent events and activities undertaken by Hands and to remind you of the range of support services offered by Hands. The newsletter will not be used for any fundraising or marketing activities; your specific consent would be required were it to do so.

Some of our processing is necessary for compliance with a legal obligation such as compliance with the Charity Acts and Charity Commission regulations or the Disclosure and Barring Services (DBS).

We may also process data if it is necessary for the performance of a contract with you, or to take steps to enter into a contract. An example of this would be processing your data in connection with the provision of Hands support services.

Where your information is used other than in accordance with one of these legal bases, we will first obtain your consent to that use.



Sharing your personal data

Your personal data will be treated as strictly confidential. It will only be shared with third parties where it is necessary for the performance of our tasks or where you first give us your prior consent. It is possible that we may need to share your data with some or all of the following (but only where necessary):

- Our IT services provider who assist Hands with maintaining all Hands systems and applications and IT security
- Other care organisations who may be involved in providing care services to our clients, for example, Social Services or other local Neighbourhood Care Groups
- On occasion, neighbouring organisations and agencies with which we are carrying out joint events or activities.

How long do we keep your personal data?

In general, we will endeavour to keep data only for as long as we need it. We will keep some records permanently if we are legally required to do so. We may keep other records for an extended period of time. For example, it is current best practice to keep financial records for a minimum period of seven years to support HMRC audits.

Your rights and your personal data

You have the following rights with respect to your personal data: When exercising any of the rights listed below, in order to process your request, we may need to verify your identity for your security. In such cases we will need you to respond with proof of your identity before you can exercise these rights.

1. The right to access information we hold on you

At any point you can contact us to request the information we hold on you as well as why we have that information, who has access to the information and where we obtained the information from. Once we have received your request, we will respond within one month.

There are no fees or charges for the first request but additional requests for the same data may be subject to an administrative fee.

2. The right to correct and update the information we hold on you

If the data we hold on you is out of date, incomplete or incorrect, you can inform us, and your data will be updated.

3. The right to have your information erased.

If you feel that we should no longer be using your data or that we are illegally using your data, you can request that we erase the data we hold.

When we receive your request, we will confirm whether the data has been deleted or the reason why it cannot be deleted (for example because we need it for our legitimate interests or regulatory purpose(s)).



4. The right to object to processing of your data

You have the right to request that we stop processing your data. Upon receiving the request, we will contact you and let you know if we are able to comply or if we have legitimate grounds to continue to process your data. Even after you exercise your right to object, we may continue to hold your data to comply with your other rights or to bring or defend legal claims.

5. The right to data portability

You have the right to request that we transfer some of your data to another controller. We will comply with your request, where it is feasible to do so, within one month of receiving your request.

6. The right to withdraw your consent to the processing at any time for any processing of data to which consent was sought.

You can withdraw your consent easily by telephone, email, or by post (see Contact details below).

7. The right to object to the processing of personal data where applicable.

8. The right to lodge a complaint with the Information Commissioner's Office (see Contact details below

Transfer of data abroad

Any electronic personal data transferred overseas will only be placed on systems complying with measures giving equivalent protection of personal rights to UK GDPR. Our website is also accessible from overseas so on occasion some personal data (for example in a newsletter) may be accessed from overseas.

Further processing

If we wish to use your personal data for a new purpose, not covered by this General Privacy Notice, then we will provide you with a new notice explaining this new use prior to commencing the processing and setting out the relevant purposes and processing conditions. Where and whenever necessary, we will seek your prior consent to the new processing.

Changes to this Notice

We keep this General Privacy Notice under regular review and any updates will be held by the Hands office. This Notice was last updated in February 2025.



Contact details

If you have any questions about this General Privacy Notice or the information we hold about you or to exercise all relevant rights, queries or complaints, please contact:

The Data Controller Hands 1st Floor Twickenham Library Garfield Road Twickenham TW1 3JT Email: info@handscaregroup.org.uk

Tel 020 8891 3346 (Mon-Fri 9.30am-12.30pm)

You can contact the Information Commissioners Office on 0303 123 1113 or via email <u>casework@ico.org.uk</u> or at the Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire. SK9 5AF.