



## INTRODUCTION

When you use True Access' services, you trust us with your personal data. We are committed to keeping that trust, which starts with sharing our privacy practices. This Privacy Notice explains in detail what personal data we collect and how we use that information.

This Notice applies to any user of True Access' services, website and social media.

This Notice is not intended to apply to any user whose personal data we are processing as a job applicant, volunteer, employee and supplier.

Effective Date of Privacy Notice: 24 August 2019

## WHO CONTROLS YOUR PERSONAL DATA?

True Access, 3 Bruckner Street, Westminster, London W10 4EW is the data controller processing your personal data.

For any questions, please contact Data Protection Officer by email at [info@trueaccess.co.uk](mailto:info@trueaccess.co.uk) or by post at the address listed above.

For simplicity throughout this Notice, 'we' and 'us' means True Access.

## WHAT LEGAL BASIS DO WE RELY ON TO PROCESS YOUR PERSONAL DATA?

The privacy law in the European Union requires us to have a legal basis for processing your personal data. Below is a list of the legal basis we rely on:

**Consent:** We rely on your consent to process your personal data in very limited circumstances such as when you provide personal data to receive, information on events and news about us and our services. After you register to receive communications you have the right to opt out at any time.

**Performance under membership:** The personal data we require and process is necessary to perform our obligations under the membership you have with us. We can only provide the service to you, if you provide us with the personal data necessary to become a member.

**Legal Obligations:** Across all of the services we provide, there are many laws that require us to process your personal data. We can only provide the service to you if you provide us with the personal data required under law. Examples include adult care regulations, safeguarding/health/safety regulations.

**Legitimate Interests:** In some situations, we process your personal data to pursue our legitimate interest in our social enterprise. We will only process your personal data if our legitimate interests do not materially impact your interests, fundamental rights, or freedoms. Examples include:

If you are a prospective, current or former service user, using your contact details to follow-up either by email, post, telephone or in-person to obtain your feedback on our service offering, reasons for choosing or not choosing our services and your experiences with us.

If you are a prospective, current or former service user, using your email address to send you our newsletters, publications, and service updates. You have the right to opt out of receiving these communications at any time.

Combining the care and service information of our service users to identify trends, learning opportunities and training needs within True Access, as well as, to calculate statistics and support improving our service or developing new services.

Tracking your website interactions to determine the effectiveness of our website and marketing.

### **WHEN DO WE COLLECT YOUR PERSONAL DATA?**

How you interact with us, determines when we collect your personal data:

Visiting our website or engaging with us on social media.

Contacting us for information.

Booking a visit or appointment for one of our events or activities.

Signing up and/ or attending our events and/or activities.

Making any payment to True Access.

If you or you are referred to one of our services by a professional.

Contacting us for information on the telephone, email or in person.

While receiving services, completing electronic and paper forms, assessments and other documentation.

### **WHAT PERSONAL DATA DO WE COLLECT AND PROCESS?**

The main reason we collect and process your personal data is to provide, evaluate and improve our services and your experiences with us.

Information you provide voluntarily (by telephone, online or in person):

If you are a prospective service user, your contact details and other information is necessary to fulfil your request for information.

If you are a service user, when registering for our services or during the course of receiving our services:

Types of personal data may include your: name, address, personal and work contact details; proof of earnings, dependent's details such as birth certificate, name, date of birth, gender, allergies, food

restrictions, special needs, health information, safeguarding information, contact details for involved professionals, and payment details.

**Information we create/process when you use our services:**

For all our services, we create records during the course of providing services to you. Records created during service delivery include notes or the completion of forms recording activities and behaviours such as learning and development interactions with others, illness, medication, incidents/accidents and safeguarding concerns, records of attendance and service use, payment information and details of your visits to our website and social media.

We take photographs and videos of our service users for monitoring and evaluating the effectiveness of our services and for marketing and publicity. We also take photos at our events for marketing and publicity purposes. Images of you will not be used without your consent. A risk assessment is completed for all venues used by TA and partner organisations within these venues. CCTV cameras may capture your image, as part of the health and safety responsibility for their users.

**Information from third parties:**

We may receive personal information about you from involved professionals/agencies (for example social workers, Local Authority officers, educational establishments, health professionals, voluntary organisations) who wish to refer you to our services. This may include sensitive information related to family circumstances, safeguarding information, behavioural issues and health information. Any involved professional who wishes to make a referral should obtain your consent for the referral to be made prior to sharing the information with us.

**WHY DO WE COLLECT PERSONAL DATA?**

We limit the collection of personal data to what is necessary to provide you with high-quality services, to support your requests, and to meet our business needs in connection with the services. We do not sell your personal data to any third parties. Below we have highlighted our reasons for collecting your personal data:

Respond adequately to your requests for services or information.

Provide services to children and families.

Provide a safe and healthy environment for those to whom we provide services.

Aid in the administration of our services to our service users.

Administer first aid, emergency and other medical care, when and if necessary.

Comply with laws, and government regulations/standards.

Support with education, training, communication, administration, and record-keeping.

Facilitate and process payments for the services.

Fulfil tax, reporting, and other financial requirements and obligations.

Prevent or detect unlawful acts.

## **WHERE DO WE PROCESS AND STORE YOUR PERSONAL DATA?**

Personal data may remain on electronic storage data systems such as our computers and hard drives. Personal data collected, on paper, is stored safely within a locked and secured cabinet, in line with Data Protection Legislation, that is only accessed by appointed managers and staff members employed by True Access.

## **WHO DO WE SHARE YOUR PERSONAL DATA WITH?**

We consider your personal data confidential and do not share it with others except as described in this Privacy Notice. There are limited circumstances that require us to disclose your personal data to others in order to deliver services, or to meet our legal obligations or legitimate business interests. Examples include:

**Your Employer:** True Access' services are often made available to you as an employee benefit. In order to meet our obligations with your employer, we provide details of your membership with us which may include your name, how long you have been a member, reasons for your membership, and other employer requested utilisation details. We disclose only information relevant to the utilisation of your membership or necessary for their administration of the benefit.

**Subcontractors and Other Agents:** We sometimes employ or contract with other companies and individuals to perform functions on our behalf. Depending upon the type of service they are providing, we may share sensitive personal data only as appropriate and necessary for the performance of the service. These parties are under contractual obligations to use your personal data only as directed by us and as needed to perform these functions. All are under a legal duty to handle such data in accordance with True Access' information security and confidentiality standards, and this Privacy Notice.

**Meet Legal Requirements:** We share personal data if required by law/regulations or as we reasonably determine to be necessary to protect our rights or the rights of others, to prevent harm to persons or property, or to enforce our website terms of use. For example, a government body or LA may require us to disclose personal data for national security or law enforcement purposes.

## **HOW LONG DO WE KEEP YOUR PERSONAL DATA?**

Whenever we collect or process your personal data, we'll only keep it for as long as is necessary, for the purpose for which it was collected and as required under law. As long as you are a prospective, current or former member of True Access, your personal details will be held on our database. However, once your membership has been cancelled, your details will remain for up to 1 year after your membership has been terminated. At the end of that retention period, your data will either be deleted completely or anonymised, for example by aggregation with other data so that it can be used in a non-identifiable way for statistical analysis and business planning.

## **WHAT RIGHTS DO YOU HAVE OVER YOUR PERSONAL DATA?**

You have the right to request:

Access to the personal data we hold about you, free of charge in most cases.

The correction of your personal data when incorrect, out of date or incomplete.

That we stop using your personal data for direct marketing (either through specific channels, or all channels).

That we stop any consent-based processing of your personal data after you withdraw that consent.

To ask for copies of your personal data, you can do so by requesting in writing to [info@trueaccess.co.uk](mailto:info@trueaccess.co.uk). To ask for your information to be amended, contact head office or email as aforementioned.

When you become a member of True Access, you will be asked to sign a release where use of your personal data, images or videos will be used for direct marketing activity through all channels including social media. You are not required to sign the release form if you do not wish to be included in our marketing activities.

If you so wish to stop receiving communications, such as newsletters, service updates and marketing, you can request this by contacting us, by phone or email. Please note that you may continue to receive communications if you are registered as a service user and are continuing to use our services and require activity updates.

To protect the confidentiality of your information, we will ask you to verify your identity before proceeding with any request you make under this Notice. If you have authorised a third party to submit a request on your behalf, we will ask them to prove they have your permission to act.

If you feel that your data has not been handled correctly, or you are unhappy with our response to any requests you have made to us regarding the use of your personal data, you have the right to lodge a complaint with the relevant data protection regulator.

UK Regulator: Information Commissioner's Office at [ico.org.uk/concerns](https://ico.org.uk/concerns)(opens in a new window; please note we can't be responsible for the content of external websites.)

## **HOW DO WE PROTECT YOUR PERSONAL DATA?**

We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this Policy. Please note however that the use of the Internet is not entirely secure and although we will do our best to protect your personal data, we cannot guarantee the security or integrity of any personal information which is transferred from you or to you via the Internet. We utilise appropriate technical, administrative and physical safeguards to protect your personal data we collect in both physical and electronic format

**WILL THIS PRIVACY NOTICE CHANGE?**

This Privacy Notice is subject to change and we will post revisions on our website. Please check back periodically, especially before you provide any personal information. This privacy policy was last updated in September 2019.

**QUESTIONS?**

We hope this Privacy Notice has been helpful in setting out the way we handle your personal data and your rights to control it.

If you have any questions that haven't been covered, please contact our Data Protection Officer who will be pleased to help you:

Email us at [info@trueaccess.co.uk](mailto:info@trueaccess.co.uk)

Or write to us at 3 Bruckner, Westminster, London W10 4EW.