



PRIVACY POLICY

Cymryd Rhan needs to be able to hold information on you which will help us to support you in the best way possible. The information you provide helps us to carry out our work, and means that we can let you know about any changes we may want to make with you, enables us to compare your information over time to see that we are supporting and responding to you in the right way.

Cymryd Rhan promises to protect and respect your privacy as set out in our Privacy Policy. Our Privacy Policy relates to our support, care and business plans, our information software systems holding citizen and staff data, our website, our Lime Survey, the use of emails and texts for communication purposes, and any other ways we collect information. It covers how we process any personal information you provide to us, and states that we are committed to keeping it safe and managing it in line with The Data Protection Act 2018.

Please read this Privacy Policy carefully. We know it's long, but it contains important information about how we protect, use and process any personal information you give to us. We aim to be clear when we collect your data and not do anything with the data you wouldn't reasonably expect.

WHAT INFORMATION DO WE COLLECT

What we want to do first is let you know what personal information we collect, and how we collect it when you engage with Cymryd Rhan, its staff and or representatives. The information we collect is set out below:

- Name
- Postal address
- Email address
- Phone number
- Gender
- Age
- Care needs
- Business needs
- Financial information
- Family and Professional information
- Health information
- Criminal offending

In all cases, when appropriate, we may also collect some information about your interests and preferences to make sure we're supporting you in the most relevant way. **How we use and process your information** section is below.

WHEN WE COLLECT YOUR INFORMATION

There are a number of instances when we might collect information from you. These include when:



- We receive a referral from yourself (or another party with your consent) to provide you with a service from Cymryd Rhan
- You give us any information during an initial assessment or review, or on our website, in writing, face-to-face, by chatting to us on social media or over the phone. **We do not record telephone calls**
- You register an interest in, or apply for, a job vacancy or volunteering opportunity with Cymryd Rhan.
- You ask for information or assistance from us, or if you make a complaint or pay us a compliment
- You give us your financial details for the use of payroll, support with budgeting, business planning and grant or benefits applications
- We are provided with information from a third party where we need to find more up to date contact information for you, or when we are conducting statistical analysis or research. This could include information from a care manager, health professional, commissioner of a contract or regulator

HOW WE COLLECT YOUR INFORMATION

We collect information in the following ways:

- When you give it to us DIRECTLY

You may give us your information in order to support you, for employment purposes and voluntary work, tell us your story and the things happening in your life so we may source the best support for you, make a donation, purchase our services directly or communicate with us. Sometimes when we support you, your information is collected by Cymryd Rhan and shared with contractual partners and regulators, and we will always inform you if we have to share this data and ask you for your permission. We are responsible for your data at all times.

- When you give it to us INDIRECTLY

Your information may be shared with us by another organisation which supports you and their privacy policy along with your consent will be sought by them with you prior to them contacting us on your behalf. You should check their Privacy Policy when you provide your information to understand fully how they will process your data.

- When you give permission to OTHER ORGANISATIONS to share or it is publicly available

We may combine information you provide to us with information available from external sources in order to gain a better understanding of how to support you and to improve our services. Also under the Well-being Act 2016 we may need this information to understand more around “what matters” to you.

This information may come from the following sources:

Social Media



Depending on your settings or the privacy policies for social media and messaging services like Facebook, WhatsApp or Twitter, you might give us permission to access information from those accounts or services.

Information which is publicly available

This may include information found in places such as Companies House and information that has been published in articles/ newspapers or the Charity Commission. We may also access information about you from the Health and Social Care system, the Education system and from other companies.

HOW WE KEEP YOUR INFORMATION SAFE

We have been storing sensitive information on people we support and our staff team for over 32 years, and we go to great lengths to keep all your information safe. We have invested in the appropriate resources to protect your personal information from loss, misuse, unauthorised access, modification or disclosure. We make sure we manage it in accordance with our legal responsibilities under applicable data protection laws. However, no internet-based site, including email, is 100% secure, so we cannot be held responsible for unauthorised or unintended access that is beyond our control. The partners that we use to provide these systems are accredited and meet the requirements under GDPR, ISO and Cyber Essentials.

HOW WE WILL PROCESS YOUR INFORMATION

After we have received your information, there are a variety of ways in which we might use it to ensure we give you the best possible service. They include:

Providing services and processing information internally

- Entering and managing your details when you agree to be supported by us or employed by us.
- Contacting you (or tracing you through your next of kin or care manager, medical practitioner, data tracing service or alternate contact)
- Confirming, updating and improving our records to make sure we have the correct information
- Processing DBS and verification checks as detailed within the Regulation and Inspection Social Care (Wales) Act 2017 including training records and financial information payroll and HMRC purposes
- Troubleshooting and fixing problems with the electronic client management system, electronic Human Resources system or website, including instances when we want to improve your user experience.

Managing and improving our relationships with citizens, staff and professionals

- Informing you of any changes to services, news about Cymryd Rhan and other ways you can help us to improve the support we provide. We will use your data in order to tailor and improve our communications so that they are relevant to you;
- Contacting you about any Cymryd Rhan fundraising events and how you may support them
- Ensuring our communications are timely and relevant, so you're only receiving the information you want. We will analyse data from our database so that we can better understand how to



support and respond to you. For example, we may analyse an area of support provided to you and other people and see that we can provide it better and we will contact you about this. This may include the review of care plans, support levels, reviews for business planning objectives and changes in need. This activity assists us in understanding the background of the people we support and helps us to make appropriate requests to other parties such as health professionals, care managers, commissioners and regulators who may have the means to assist in improving your support and experience of being provided with services from Cymryd Rhan. You may choose to opt out of your data being used by contacting us on 01597 828050 or emailing info@cymryd-rhan.org

- Asking you about how best to support you may be a legal requirement, a contractual necessity or of vital interest to us. We will inform you of this.
- Inviting you to get involved with Cymryd Rhan surveys, campaigns or research (either internally or by another company) to find out more about the demographics, interests and behaviours of our people we support or employ.
- Where you have agreed to receive email or SMS communications from us, we may provide your email address or mobile phone number to other safe and approved partners with your permission and for your benefit. We use platforms such as Facebook, Instagram, Twitter or YouTube, or to digital advertising networks that are providing services to us by displaying our advertising to you on those social media platforms and other websites, as well as identifying audiences with interests similar to yours. You can opt out of your data being used to display advertising to you by contacting us on 01597 828050 or emailing info@cymryd-rhan.org.

Responding to any queries or issues

- We will respond to all and any queries, complaints or compliments within 24 hours of a working day or next working.

Conducting training and reviews of our service

- Enhancing or reviewing the service we provide to you, and meeting training needs which we select through personal development or mandatory requirement
- Conducting statistical analysis and research using, where possible, anonymised data.

Meeting our legal obligations

- Using information for auditing purposes or risk management.
- If we have a legal obligation to use or disclose information about you for instance, where we are ordered by a court or regulatory authority or we are legally required to hold information for accounting/tax purposes, safeguarding or criminal proceedings.

Other

- When we consider you for potential job or volunteering opportunities where you complete an application;
- Transferring information to any entity which may acquire the rights in us (for example, as the result of a merger or TUPE);
- For any other purpose to which you agree.
- We are required under our contractual obligations to provide information on you in relation to our performance and compliance.



Legitimate Interests

In certain instances, we may collect and use personal information where this is necessary for our own (or a third party's) legitimate interest such as:

- Your preferences (see **How We Will Communicate With You** section below);
- Sending material to you by post or contacting you by telephone for information around your support and requests (subject to checking against the preferred communication route);
- Conducting research to better understand who our citizens are and better target our fundraising, social and support activities;
- Monitoring who we deal with to protect our charity against fraud, money laundering and other risks;
- Maintaining and administering our register, staff, citizen and professional's database and systems.

In all cases, we balance our legitimate interests against your rights as an individual and make sure we only use personal information in a way or for a purpose that you would reasonably expect in accordance with this Privacy Policy and that does not intrude on your privacy or previously expressed preferences.

Processing your sensitive personal data

We process some of the sensitive personal data you might provide, (e.g. information about your health, levels of care and financial information) where you have given your consent to do so, as set out on applicable forms, or where you have made that information manifestly public. This information helps us match you with the right support, in the right way and at the right time.

WE KEEP YOUR INFORMATION SAFE AND WHO HAS ACCESS TO IT

We want you to know that we will never sell or pass on your personal information to third parties for their own marketing purposes. There may be some third parties that we need to share personal information with in order to help us provide services to you including the following:

- Related Cymryd Rhan entities*, such as approved and commissioned IT software provider
- Any entities who may, or do, acquire any rights in us in a merger, acquisition or reorganisation
- Our advisors, in order to help us better manage, support or develop our organisation and comply with legal and regulatory obligations
- Any service providers who need to know certain information in order to provide you (or us) with support such as local authorities and Care Inspectorate Wales
- Our partners including, for example, events organisers we work with; other support providers where a joined up support and care approach is taken.
- Law enforcement bodies and/or regulatory entities, in order to comply with any legal obligation or court order.

We use external companies to provide us with the technology to collect and store your data. However, we always carry out comprehensive checks on these companies before we work with them and put a contract in place to set out our requirements, especially in relation to how they manage the personal data they have access to.

Under our contractual necessity we may share anonymous data about you with organisations engaged in related research activities to help improve health outcomes patients, but, as this

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information is anonymous, these organisations will be unable to identify the information as relating to you.

HOW WE WILL COMMUNICATE WITH YOU

You can always opt out of receiving the marketing and fundraising communications (see below), but we will always contact you in relation to your status as a potential receiver of this information. Once your information has been stored on the database, you will stay on it until you are no longer supported by us (unless you ask to be removed by contacting Nick Evans on 01597 828050 or emailing info@cymryd-rhan.org). We are also required by law to keep some information safely archived for a period of time and that we will review this information within the appropriate time scales or at the request of the individual.

MARKETING AND FUNDRAISING COMMUNICATIONS

As a charity some of our services do require the need to market their products such as the Child Care Business Support Team or fundraise. When signing up through our initial contact with you, we will gain your consent to contact you so we can update you on news about the services being offered, information about campaigns to get involved with, ways to financially support the organisation, stories from people we support and their families, and other news we think you'd be interested in. It is always your choice as to whether you want to receive information about our work, how we raise funds and the ways you can get involved.

You can update your communication preference or unsubscribe from these communications at any time (including telling us that you don't want us to contact you for marketing purposes by telephone or by post) by contacting us (see **Contacting Us** section below). We will not use your personal information for marketing purposes if you have indicated that you do not wish to be contacted by us for such purposes. However, we will retain your details on a suppression list to help ensure that we do not continue to contact you.

Unless you choose to hear more from us, our communications with citizens, staff, families, learners, settings and professionals tend to be on an appropriate time scale with the least amount of intrusion. We will never pass on your information to other companies or charities for their own marketing purposes. We may use third party data tracing services and publicly available sources in order to make sure your information is up to date so we can keep in touch.

HOW WE WILL RETAIN YOUR INFORMATION

The information you provide will be retained by us in accordance with applicable laws. We will take reasonable steps to destroy or de-identify personal information we hold if it's no longer needed in connection with the purpose(s) for which it was collected and/or processed.

However, if you do choose to share your information with us publicly (for example, photos or footage on social media), then it's possible that other people may have copied this information during the time that it was live, and therefore use of it is beyond our control.

VISITING THIRD PARTY WEBSITES

This website contains links to other websites that we believe may be of interest to you. This Privacy Policy only applies to our website, so if you link to another website, we recommend you read the privacy policy of that website before sharing any personal or financial data.

We'll be there for you!



WHAT YOUR RIGHTS ARE

We want to make sure you're in control of how we use and keep your information.

You have the right to:

- Be told how your personal information will be used;
- Request a copy of the information we hold about you;
- Update or amend the information we hold about you if it is wrong;
- Change your communication preferences at any time;
- Ask us to restrict the processing of your personal information if there is a disagreement about its accuracy or legitimate use;
- Ask us to remove your personal information from our records;
- Request an electronic copy of your personal information be sent to you, or another organisation;
- Object to the processing of your information for marketing purposes on the basis of a legitimate interest or for statistical purposes;
- Ask us for human intervention or to challenge any such decision where we take automated decisions in relation to your personal information; or
- Raise a concern or complaint about the way in which your information is being used.

If you wish to find out more about these rights, or obtain a copy of the information we hold about you, please contact the Data Protection Processor at:

Nick Evans

Balcony Office

First Floor

Town Hall

Great Oak Street

Llanidloes

Powys

SY18 6BN

Email: nick.evans@cymryd-rhan.org

we'll be there for you!



Or you can find out more on the Information Commissioner's Office website at <https://ico.org.uk/for-the-public/>

HOW YOU CAN CONTACT US AND FIND UPDATES TO THIS POLICY

*'Us' or 'we' refers to the registered charity Cymryd Rhan (no. 1961994 in England and Wales) and a company limited by guarantee (company no. 517090).

Registered address:

Balcony Office

First Floor

Town Hall

Great Oak Street

Llanidloes

Powys

SY18 6BN

**We are registered with the UK Information Commissioner's Office (ICO) as a data controller.