

# **Managing Our Clients' Personal Data**

Under the Data Protection Act 2018 The Renewal Trust has responsibilities as a 'Data Controller', meaning that we are responsible for the collection, storage, use and disposal of any personal data that we collect. Personal Data is data relating to a living individual who can be identified by that data, or from that data and any further information which is likely to come into the possession of the data controller.

We take our responsibility to our clients very seriously and this document sets out the approach we will adopt to ensure lawful, fair and transparent processing of data.

In order to fulfil our legitimate business activities in pursuit of our charitable objectives we need to routinely collect data from our clients. The data we collect and retain for any period will normally be collected from our clients with their consent (for example via the signing of a personal information consent form). Where we rely on consent as the means of processing data we will ensure that the consent given is fully informed so that you know the uses which we will make of your data.

Personal data will only be shared for a specific purpose related to the fulfilment of our obligations or where appropriate consent has been obtained from you.

The following information is designed to support our clients in making the choice whether to give consent to the collection, retention and analysis of their personal information and to provide reassurance that their information will be handled fairly and properly.

## Information we (will) collect

Name and address – We need this data in order to contact you in relation to the services you are accessing. The Renewal Trust is also particularly interested in your addresses as this helps us to monitor which parts of the Trust's operating area are engaging with our services and activities and, just as importantly, the parts of the local area that we're still not reaching.

**Your date of birth** – This helps us to identify you when we're looking through our records. It is also useful in terms of targeting our activities to specific age groups and in providing evidence to potential funders who might have restrictions on the age groups that they wish to fund.

Your gender and your ethnic origin – The Renewal Trust wishes to provide services and activities that benefit as many as people as possible and for this benefit to be felt by all local people equally. It is important to us to include all genders when we plan and deliver our activities and to be able to tailor our activities to include under-represented groups.

**Your email** – This is so that we can contact you by the easiest method for you. It also saves our resources and is better for the environment.

**Your telephone number** – If you would prefer us to contact you via the telephone, we are happy to do so. This is particularly useful in the event that we may need to contact someone in the event of an emergency.

The activities led by The Renewal Trust that you have participated in – One of the main reasons that we will be collecting data is to help us to keep track of how individual clients make use of our services and activities. We will look at whether people come to more than one type of activity, the location of the activities they attend, the dates and times that people tend to attend etc.

What we will use this information for – As previously mentioned, our ultimate aim when collecting and analysing the personal information is to be able to improve the planning and delivery of the services and activities that we and other organisations in Mapperley, Sneinton and St Ann's provide to both you and other community members. We want to reach as many people in Mapperley, Sneinton and St Ann's as possible and to provide the kind of activities that local people want to participate in.

# How we will manage your personal data

**Electronic data** – Your information will be entered into a Customer Relationship Management software package. This is a password-protected storage system that helps us to analyse our clients / customers and to understand who we're reaching and who we haven't reached yet.

**Paper data** – Paper records of people's personal details will be held on-site in secure and lockable filing cabinets.

Who will see it – The data processed by The Renewal Trust will not be shared with any third party organisations or individuals without the consent of the individual who is the subject of the data. Exceptions to this include the sharing of data to prevent a crime or to safeguard an individual and where required by law. Any reports produced as a result of the data analysis will be strictly anonymised to prevent the identification of individuals.

How long will it be retained for – (see: 'Keeping Your Records Accurate and Up To Date)

#### **Data Protection**

The Renewal Trust is committed to data protection and will ensure the security and integrity of your personal information. We will maintain confidential files of accurate and relevant information and observe all relevant legislation, with particular reference to the Data Protection Act.

Only those members of staff who will be working with our customers / service users on the planning, improvement and delivery of our services and activities will have access to your personal information. Any reports produced as a result of analysing your personal information will be carefully anonymised so as to prevent the identification of individuals. We have in place appropriate security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed.

We have in place procedures to deal with any suspected data security breach and will notify you and the Information Commissioner's Office of a suspected breach where we are legally required to do so.

Where we use third parties, including booking systems for booking activities, marketing automation platforms, for bulk email or postal communications we ensure that such suppliers are, as appropriate, fully certified and compliant with applicable privacy shield frameworks.

### Your rights

This Notice is intended to provide you with enough information to be able to decide whether or not you are happy for us to collect and retain your information. Your consent would allow us to collect, retain and use your information (or your visual image), or you can refuse consent, in which case none of your information can be collected, nor retained.

It is important that you realise that you can change your mind at any point and withdraw this consent to receive information. As soon as you make this decision known, we are obliged to destroy

immediately any personal information pertaining to you that we have on file unless there is a clear legal imperative for us to do otherwise. However, we do need to make clear that failure to consent may affect the support/services that we are able to provide to you, and there may be other methods under the Data Protection Act by which we are able to lawfully process data, such as legitimate interests and where we do rely on such alternative means we will make an assessment of the requirement in accordance with advice from the Information Commissioners Office.

### **Seeing Your Records**

Under the Data Protection Act 2018, you have a right to see any records that we hold about you, both on paper and electronically (on computer).

Should you wish to do this, please contact this address:

Office Manager
The Renewal Trust
27-31 Carlton Road
Nottingham
NG3 2DG

We will endeavour to respond to your request as soon as possible and at the latest within the period specified in law.

### **Keeping Your Records Accurate and Up To Date**

The personal information that we hold about our clients / customers will only be genuinely effective in helping us to improve services and activities if we are able to keep it accurate and relevant.

We are aware that information held for two years risks becoming out of date and loses its value. Therefore, while we would like to keep in touch with customers and clients in order to continually refresh the personal information we hold, we will also take measures to destroy older information at set times, usually every two years.

### **Complaints Procedure**

Should you feel that you have cause for complaint about the way in which your information has been collected, stored or used, please feel free to contact the Office Manager via the address previously mentioned.

#### **Further Information**

#### Information Commissioner's Office

Wycliffe House Water Lane Wilmslow Cheshire SK9 5AF

Phone: 01625 545 745

Email: data@dataprotection.gov.uk

Website: https://ico.org.uk/