

## **Privacy Policy for Companions**

Emmaus Leicestershire & Rutland promises to respect and keep safe any personal data you share with us, either directly or through third parties. We aim to be clear about how we will use your data and not do anything you wouldn't reasonably expect from us.

For the purpose of the General Data Protection Regulation and the Data Protection Act 1998 the data controller is Emmaus Leicestershire & Rutland of The Emporium, Stockwell Head, Hinckley LE10 1RG, a registered charity with Charity Number: 1146326.

### **What information will we collect?**

**If you join an Emmaus community we will usually collect the following information about you:**

- Name
- Date of birth
- Nationality
- Next of kin details
- National insurance number
- Housing situation and housing history
- Support records
- Risk assessments

**We may also collect, store and use the following "special categories" of more sensitive personal information:**

- Health (including history of drug and alcohol use and details of additional support needs)
- Eligibility to claim benefits
- Bank details
- Passport or birth certificate copy to verify your ID

### **How is your personal information collected?**

We need all the categories of information in the list above primarily to allow us to provide support to you during your time living at Emmaus Leicestershire & Rutland. The legal basis for processing your personal data is to protect your vital interests. The situations in which we will process your personal information are listed below:

- To meet your support needs;
- To address the risk to the community, other companions, staff, volunteers, members of the public and yourself;
- To claim Housing Benefit and other services you might be eligible;

### **How we use particularly sensitive personal information**

"Special categories" of particularly sensitive personal information require higher levels of protection. We need to have further justification for collecting, storing and using this type of personal information. Our legal basis for processing special categories of personal data is that such processing is carried out in the course of our legitimate activities as a charity with appropriate safeguards in place.

We will use your particularly sensitive personal information in the following ways:

- To share your information with doctors or other relevant agencies to meet your support needs;
- Emergency services

## **Do we need your consent?**

We do not need your consent if we use special categories of your personal information in accordance with our written policy to carry out our legitimate activities as a charity. In limited circumstances, we may approach you for your written consent to allow us to process certain particularly sensitive data. If we do so, we will provide you with full details of the information that we would like and the reason we need it, so that you can carefully consider whether you wish to consent. You should be aware that it is not a condition of your staying with us that you agree to any request for consent from us.

## **Information about criminal convictions**

We may only use information relating to criminal convictions (e.g. sex offender registration and unspent criminal convictions) where the law allows us to do so. This will usually be where such processing is necessary to carry out our obligations and provided we do so in line with our data protection policy.

Less commonly, we may use information relating to criminal convictions where it is necessary in relation to legal claims, where it is necessary to protect your interests (or someone else's interests) and you are not capable of giving your consent, or where you have already made the information public.

We envisage that we will hold information about criminal convictions and we will use information about criminal convictions and offences in the following ways:

- To conduct risk assessments
- To assess your eligibility about joining Emmaus Leicestershire & Rutland

## **Accessing information from other sources**

We may gain access to your information from other third party organisations, when you when you give them permission to do so or if the information is available publicly. This information will only be recorded if it is beneficial in order to provide you with support during your time at Emmaus.

## **Data Sharing**

We may have to share your data with third parties, including third-party service providers.

We require third parties to respect the security of your data and to treat it in accordance with the law.

## **Data security**

We have put in place measures to protect the security of your information. Details of these measures are available upon request.

Third parties will only process your personal information on our instructions and where they have agreed to treat the information confidentially and to keep it secure.

We have put in place appropriate security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal information to those employees who have a business need to know. They will only process your personal information on our instructions and they are subject to a duty of confidentiality. Details of these measures may be obtained from Community Director.

We have put in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so.

## **Your rights in connection with personal information**

Under certain circumstances, by law you have the right to:

- **Request access** to your personal information (commonly known as a "data subject access request"). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.
- **Request correction** of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.
- **Request erasure** of your personal information. This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal information where you have exercised your right to object to processing (see below).
- **Object to processing** of your personal information where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground. You also have the right to object where we are processing your personal information for direct marketing purposes.
- **Request the restriction** of processing of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.
- **Request the transfer** of your personal information to another party.

If you want to review, verify, correct or request erasure of your personal information, object to the processing of your personal data, or request that we transfer a copy of your personal information to another party, please contact us on 01455 637587 or [info@emmauslandr.org](mailto:info@emmauslandr.org) or send a description of the information you want to see and proof of your identity by post to Emmaus Leicestershire & Rutland, The Emporium, Stockwell Head, Hinckley LE10 1RG

No fee usually required.

You will not have to pay a fee to access your personal information (or to exercise any of the other rights). However, we may charge a reasonable fee if your request for access is clearly unfounded or excessive. Alternatively, we may refuse to comply with the request in such circumstances.

### **What we may need from you**

We may need to request specific information from you to help us confirm your identity and ensure your right to access the information (or to exercise any of your other rights). This is another appropriate security measure to ensure that personal information is not disclosed to any person who has no right to receive it.

### **How long we will retain your information for**

We will retain your personal information for the duration of your time at Emmaus and for 6 months after you leave. At that point all information we hold about you will be securely disposed of.

### **Keeping our records up to date**

It is your responsibility to inform us of any changes to your personal details, such as change of address, during your time working for Emmaus Leicestershire & Rutland.

We may change this Privacy Policy from time to time. If we make any significant changes in the way we treat your personal information we will make this clear by contacting you directly.

If you have any questions, comments or suggestions, please let us know by contacting us at Emmaus Leicestershire & Rutland, The Emporium, Stockwell Head, Hinckley LE10 1RG.