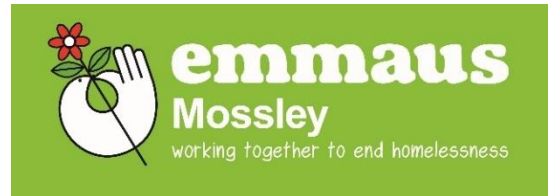


**EMMAUS MOSSLEY**

**Privacy Statement:  
Companions & Potential Companions**



**INTRODUCTION**

Emmaus Mossley (“Emmaus”, “we” or “us”) respects your privacy and 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.

This privacy statement aims to give you information on how Emmaus collects and processes your personal data in connection with you being a companion with us. We recognise the need to treat your personal data in an appropriate and lawful manner, in accordance with the UK GDPR as defined in the Data Protection Act 2018.

**Controller**

Emmaus Mossley is the controller and is responsible for your personal data (collectively referred to as “Emmaus”, “we”, “us” or “our” in this privacy statement).

**Contact details**

If you have any questions about this privacy statement or our privacy practices, please contact us in the following ways:

Full name of legal entity: Emmaus Mossley

Email address: [info@emmausmossley.org.uk](mailto:info@emmausmossley.org.uk)

Postal address: Emmaus Mossley, Longlands Mill, Queen Street, Mossley, OL5 9AH

You have the right to make a complaint at any time to the Information Commissioner’s Office (ICO), the United Kingdom (UK) supervisory authority for data protection issues ([www.ico.org.uk](http://www.ico.org.uk)). However, we would appreciate the chance to deal with your concerns before you approach the ICO so please kindly contact us in the first instance.

**WHAT INFORMATION WILL WE COLLECT**

If you make an application to join the Emmaus Mossley community as a companion, we will usually collect the following information about you:

- Name
- Date of birth
- National insurance number

- Housing situation and housing history
- Support history
- Gender
- Contact details

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

- Nationality and/or ethnicity
- Health (including history of drug and alcohol use and details of additional support needs)
- Eligibility to claim benefits
- Unspent criminal convictions

## **HOW IS YOUR PERSONAL INFORMATION COLLECTED?**

We collect information when you apply to join Emmaus Mossley and provide information in your application form and through our direct interactions with you.

## **WHY DO WE COLLECT YOUR INFORMATION?**

Emmaus Mossley will only process your personal data in compliance with applicable data protection laws, and where we have a lawful basis to do so. Most commonly, we will use your personal data in the following circumstances:

- where we need to comply with a legal obligation;
- where it is necessary for legitimate interests pursued by us and your interests and fundamental rights do not override these interests;
- where it is necessary to protect your vital interests;
- where it is necessary for a contract we have with you.

We need all the categories of personal information in the list above primarily to enable us to make a decision about your suitability to join Emmaus Mossley and to ensure we can provide support to you during your time living at an Emmaus. We will use your information to:

- assess your suitability to join Emmaus Mossley;
- determine whether Emmaus Mossley will be able to meet your personal support needs; and/or
- to support you as part of the Emmaus community.

## **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 determine your suitability to join Emmaus Mossley;
- to assess what risk, if any, you may pose to the wider Emmaus community; and/or
- to provide you with applicable support.

## **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 that we will use this information in the following ways:

- to assess your suitability to join Emmaus Mossley;
- to assess any risks, you may pose to others while living at the Emmaus community; and/or
- to assess your support needs.

## **ACCESSING INFORMATION FROM OTHER SOURCES**

We may gain access to your information from other third party organisations, 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**

If your application to join Emmaus Mossley is successful and at a later date you decide to move from one Emmaus community to another, we will transfer your support record to the new community, to allow consistency of support during your time at Emmaus.

We will not share your personal details with third parties, other than listed below, without gaining explicit consent. The only exception to this would be in a situation which posed a safeguarding risk, or we were legally obliged to pass the information on.

We may share your personal details with third party service providers to the extent necessary for professional advisers including lawyers, auditors and/or insurers and service providers providing us with administration, IT or communication services support.

## **DATA SECURITY**

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

We will only pass on your information to another community when 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 by speaking to a member of staff.

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 speak to a member of staff, or email us, or send a description of the information you want to see and proof of your identity by post to our postal address.

## **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 while your application to join Emmaus Mossley is being processed and for one year from the date of application. We will then securely dispose of all personal information we hold at Emmaus Mossley. Some anonymised information will be retained for statistical and monitoring purposes.

If you agree for us to use your story, we will keep the story information for 5 years unless you withdraw your consent.

## **KEEPING OUR RECORDS UP TO DATE**

It is your responsibility to inform us of any changes to your personal details.

We may change this Privacy Policy from time to time. Any updates will be available via our website.

If you have any questions, comments or suggestions, please let us know by contacting us via any of the methods mentioned above.