

Privacy Policy

(DS-DP003)

Policy Owner	Chief Executive
Date Written	10/05/2019
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Version Control:

Issue	Amendment	Date	Initials
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2	Policy signed off	16/05/2019	ST
3	Reviewed for Blueprint	14/02/2021	IL
4	Reviewed for Committee Submission	01/02/2022	ST
5	Update following Committee feedback	10/03/2022	MP
6	Further update following feedback from MM	12/04/2022	MP
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Introduction

This Privacy Policy applies to information we collect about individuals who interact with our organisation. It explains what personal information we collect and how we use it.

If you have any comments or questions about this notice, please contact us at info@dementiasupport.org.uk

Personal Data Processed

The following tables explain the types of data we collect and the legal basis, under current data protection legislation, on which this data is processed. The tables are divided into specific areas.

Fundraising & Marketing:

Purpose	Data (key elements)	Basis
Enquiring about our organisation and its work	Name, email, message	Legitimate interests - it is necessary for us to read and store your message so that we can respond in the way that you would expect.
Subscribing to email updates about our work	Name, email	Consent - you have given your active consent.
Making a donation	Name, email, address, donation information including gift aid declaration	Legitimate interests - this information is necessary for us to fulfil your intention of donating money and your expectation of receiving a confirmation message.
Signing up as a supporter	Name, email, address	Consent and legitimate interest – this information is necessary to contact individuals about services, events, fundraising and marketing
Website functionality	Website activity collected through cookies	Legitimate interests - it is necessary for us to store a small amount of information, usually through cookies, to deliver functionality that you would expect, such as remembering the contents of your order before you have fully completed the process. People also have the right to opt out.
Indirect collection	Name, email, address, donation information including gift aid declaration	Your information may be shared with us by fundraising sites like JustGiving. Independent third parties will only do this when you have specified that you wish to support Dementia Support and with your clear consent. When this happens, we will treat the information in the same way as if you had shared it directly with us.

Our Services:

Purpose	Data (key elements)	Basis
Day Breaks Services	Name Contact Information Date of Birth How they heard about DS Carer Information How they wish to be contacted Case Notes Relevant Medical/Medication history	Consent – to provide information on customers using the service to ensure we can safely and effectively meet their needs. Non-personalised data will also be used for statistical purposes
Wayfinding Service	Name – Carer and PLWD Contact Information – Carer and PLWD Date of Birth – Carer and PLWD Demographic information How they heard about DS If they have a family member living with Dementia – if carer presenting How they wish to be contacted Brief history of presenting issues Onward referrals both internal and external Consent to hold information Plan of action	Consent – to provide information on who is accessing the service and to ensure we have a record of interventions. Non-personalised data will also be used for statistical purposes
3 rd party clinics and therapies	Name Contact Information Residence area Relevant medical history (for certain therapies)	Active consent – by booking services you have given your active consent. Non-personalised data will also be used for statistical purposes.
Activities	Name Contact Information Residence area Relevant medical history (for certain activities)	Active consent – by booking services you have given your active consent. Non-personalised data will also be used for statistical purposes.
Smart Zone	Name – Carer and PLWD Contact Information – Carer and PLWD Date of Birth – Carer and PLWD How they wish to be contacted Brief history of presenting issues Consent for onward referral internal or external Consent to hold information Consent to pass on information to Carers Support who process the tech referrals	Active consent – by requesting referral you have given your active consent. Non-personalised data will also be used for statistical purposes.

How We Use Your Data

We will only use your data in a manner that is appropriate considering the basis on which that data was collected, as set out in the tables at the top of this policy.

For example, we may use your personal information to:

- ✿ Reply to enquiries you send to us
- ✿ Handle donations or other transactions that you initiate
- ✿ Where you have specifically agreed to this, send you marketing communications by email relating to our work, which we think may be of interest to you.
- ✿ Where you have specifically agreed to this, make onward referrals to internal services or outside organisations
- ✿ We may add publicly accessible information to an individual's record to enable us to identify and communicate activities that may be of interest to them

All supporter records maintained by Dementia Support will be kept confidential to the required extent under the GDPR. Supporter records will be held on a secure database (Donorfy). Customer records will be held on a secure database (Charitylog), where paper records are required to be kept they will be stored locked away from public access.

You decide how you want us to contact you, whether by mail, email or by phone. You can update your communication preferences at any time by letting us know. We will also send you a communication at timely intervals so you can update and refresh your communication preferences.

When We Share Your Data

We will not sell or swap your details with other charities or third parties. We will only pass your data to third parties in the following circumstances:

- ✿ You have provided your explicit consent for us to pass data to a named third party
- ✿ We are using a third party purely for the purposes of processing data on our behalf and we have in place a data processing agreement with that third party that fulfils our legal obligations in relation to the use of third party data processors; or
- ✿ We are required by law to share your data.

In addition, we will only pass data to third parties outside of the EU where appropriate safeguards are in place as defined by Article 46 of the General Data Protection Regulation.

How Long We Keep Your Data

We take the principles of data minimisation and removal seriously and have internal policies in place to ensure that we only ever ask for the minimum amount of data for the associated purpose and delete that data promptly once it is no longer required.

Where data is collected on the basis of consent, we will seek renewal of consent at least every three years.

Rights You have Over Your Data

You have a range of rights over your data, which include the following:

- ✿ Where data processing is based on consent, you may revoke this consent at any time. We will make it as easy as possible for you to do this (for example by putting 'unsubscribe' links at the bottom of all our marketing emails).
- ✿ You have the right to ask for rectification and/or deletion of your information.
- ✿ You have the right of access to your information.
- ✿ You have the right to lodge a complaint with the Information Commissioner if you feel your rights have been infringed.

A full summary of your legal rights over your data can be found on the Information Commissioner's website here: <https://ico.org.uk/>

If you would like to access the rights listed above, or any other legal rights you have over your data under current legislation, please get in touch with us at info@dementiasupport.org.uk

Please note that relying on some of these rights, such as the right to deleting your data, will make it impossible for us to continue to deliver some services to you. However, where possible we will always try to allow the maximum access to your rights while continuing to deliver as many services to you as possible.

Customers and Supporters have the right to see their own data held on record, and to challenge its accuracy, also making complaints to both the charity, in the first instance, and to the Information Commissioners Office.

Cookies & Usage Tracking

A cookie is a small file of letters and numbers that is downloaded on to your computer when you visit a website. Cookies are used by many websites and can do a number of things, e.g., remembering your preferences, recording what you have put in your shopping basket, and counting the number of people looking at a website.

Where cookies are used to collect personal data, we list these purposes above, along with other personal data that we collect. However, we also use some cookies that do not collect personal information but that do help us collect anonymous information about how people use our website.

We use Google Analytics for this purpose. Google Analytics generates statistical and other information about website usage by means of cookies, which are stored on users' computers. The information collected by Google Analytics about usage of our website is not personally identifiable. The data is collected anonymously, stored by Google, and used by us to create reports about website usage. Google's privacy policy is available at <http://www.google.com/privacypolicy.html>.

Modifications

We may modify this Privacy Policy from time to time and will publish the most current version on our website. If a modification meaningfully reduces your rights, we'll notify people whose personal data we hold and are affected.

Data Controller

Dementia Support, Sage House Tangmere has a nominated Data Controller:

Name: Sally Tabbner, CEO
Email: info@dementiasupport.org.uk
Telephone: 01243 888 691