

PRIVACY NOTICE FOR CAVS MEMBERS

In accordance with the General Data Protection Regulation (GDPR), we have implemented this privacy notice to inform you of the types of data we process about you. We also include within this notice the reasons for processing your data, the lawful basis that permits us to process it, how long we keep your data for and your rights regarding your data.

A) Data Protection Principles

Under GDPR, all personal data obtained and held by us must be processed according to a set of core principles. In accordance with these principles, we will ensure that:

- Processing is fair, lawful and transparent
- Data is collected for specific, explicit and legitimate purposes
- Data collected is adequate, relevant and limited to what is necessary for the purpose of processing
- Data is not kept for longer than is necessary for its given purpose
- Data is processed in a manner that ensures appropriate security of personal data including protection against unauthorised or unlawful processing, accidental loss, destruction or damage by using appropriate technical or organisation measures

B) Types of Data Held for CAVS Members

We keep several categories of personal data about you in order to provide our services to you.

Specifically, we hold the following types of data:

- Personal details e.g. name, address, telephone numbers, email address
- Job Title / Position held in your organisation
- CAVS Membership Forms
- Verbal Consent Records
- Photograph / video and voice recordings

C) Collecting Your Data

We receive data directly from you by enquiry and subsequently upon the start of your engagement with our membership.

Before you disclose to us the personal information of another person, you must obtain that person's consent to both the disclosure and the processing of that personal information.

In some cases, we will collect data about you from third parties (partner agencies) who may act as an introducer of our membership and services that we offer. In these instances the third party would have obtained your consent for us to be provided with your information.

D) Lawful Basis for Processing

The law on data protection allows us to process your data for certain reasons only. In the main, we process your data in order to perform the contract we have with you and for historical or statistical purposes.

Activity Requiring your Data	Lawful Basis
Provide the services that you have access to as a CAVS Member	Performance of Contract
Information sharing e.g. membership forms, verbal consent records, photographs, video/ voice recordings	Consent

E) Special Categories of Data

Special categories of data is data relating to your:

- Race
- Ethnic Origin
- Politics
- Religion
- Trade Union Membership
- Genetics and Biometric data
- Health
- Sex Life; or Sexual Orientation

Special categories of data **we may hold** is data relating to your:

- Race
- Ethnic Origin
- Health
- Sexual Orientation

We will process special categories of data when the following applies:

- You have given explicit consent to the processing
- We must process the data in order to carry out our legal obligations
- We must process data for reasons of historical research or statistical purposes

F) Failure to Provide Data

Your failure to provide us with data may mean that we are unable to provide a service to you.

G) Who we share your data with

Employees and office based volunteers within our company will have access to your data which is relevant to their function. All staff with such responsibility have been trained in ensuring data is processed and held in line with GDPR.

CAVS are contracted by a range of organisations; NHS, County Councils, Borough Councils and other trusted third party organisations who have been assigned or contracted to deliver services. It is sometimes a contractual requirement that we share personal identifiable information with a commissioner of services.

IT contractors that support our business systems

Marketing & Communications contractor that manages our marketing communications e.g. newsletters and events

Print processors

H) Protecting Your Data

We take the security of your personal data seriously and are aware of the requirements to ensure your data is protected against accidental loss, destruction and abuse. We have implemented processes to guard against such.

Where we engage third parties to process personal data on our behalf, they:

- are obligated to comply with the requirements of data protection laws

- are obligated to only use the data for the purpose/s for which it is supplied
- are under a duty of confidentiality; and are required to implement appropriate technical and organisational measures to ensure the security of your data.

I) Where we store your Data

All data that you provide to us is held electronically, within a secure database accessed via secure computers and backed up on encrypted servers located within the UK. We may also store paper records in locked filing cabinets or cupboards.

J) Retention Periods

We will only retain your data for as long as necessary to fulfil the purposes we collected it for, which will be for the duration of your engagement and for three years after your engagement has ended. Your data will then be anonymised and retained for historical and statistical purposes.

K) Data Subject Rights

You have the following rights in relation to the personal data we hold on you:

- The right to be informed about the data we hold on you and what we do with it
- The right of access to the data we hold on you.
- The right to request that we change incorrect or incomplete data; and to request that we delete or stop processing your data
- The right to request that we transfer the data we hold on you to another party
- The right to object to the inclusion of any information
- The right to regulate any automated decision-making and profiling of personal data
- Where you have provided consent to our use of your data you can request to withdraw your consent at any time by emailing consent@castlepointavs.org.uk or writing to Castle Point Association of Voluntary Services Ltd, The White House, Kiln Road, Benfleet, Essex SS7 1BU for the attention of The Compliance Officer stating what data you wish to be withdrawn.

More information can be found on each of your rights and how you can exercise them, within our Data Protection Policy which can be found @ www.castlepointavs.org.uk

L) The Caldicott Principles

CAVS strives to achieve compliance with the seven Caldicott Principles in relation to personal confidential data (PCD).

- Justify the purpose(s)
- Do not use PCD unless it is absolutely necessary
- Use the minimum necessary PCD
- Access to PCD should be on a strict need to know basis
- Everyone with access to PCD should be aware of their responsibilities
- Comply with the law
- The duty to share information can be as important as the duty to protect patient confidentiality

M) Questions, Comments or Concerns

Should you have any questions, comments or concerns about any aspect of this notice or how we handle your data please contact our Compliance Officer in writing at Castle Point Association of Voluntary Services, The White House, Kiln Road, Benfleet, Essex SS7 1BU

N) Making A Complaint

If you think your data rights have been breached, you are able to raise a complaint with the Information Commissioner (ICO). You can contact the ICO at Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF or by telephone on 0303 123 1113 (local rate) or 01625 545 745.