

## **POSSABILITIES PRIVACY NOTICE MAY 2018**

PossAbilities is a processor and controller of your personal data. We respect your data and your privacy is important to us.

This privacy notice explains what personal data we collect and how it is used. This notice also explains what rights you have over your personal data and how you can use those rights.

You have the right to object to some of the processing which PossAbilities carries out. More information about your rights and how to exercise these is set out in the “Your rights” section of this notice.

PossAbilities registered office is PossAbilities, Head Office, Cherwell Wellbeing Hub, Cherwell Avenue, Heywood, OL10 4SY

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### **1. Summary of how we use your data and your rights**

We use your data to provide and improve our products and services, including for research, feedback and enquiries, and for safety and security purposes.

We will use your data to comply with laws and regulations. We may use your data to prevent and detect crime, such as fraud.

You have the right to object to some of the processing PossAbilities carries out. More information about your rights and how to exercise these is set out in the “Your rights” section of this notice.

When you give consent, you are able to withdraw that consent at any time, for instance by emailing [dataprotection@possabilities.org.uk](mailto:dataprotection@possabilities.org.uk)

You can also email [dataprotection@possabilities.org.uk](mailto:dataprotection@possabilities.org.uk) to exercise any other data rights, such as obtaining a copy of your data, correcting, deleting or restricting how we use your data. Please see “Your rights” for more information.

We may contact you from time to time with updates and information about our services. You can unsubscribe from these communications at any time. To opt out you can email [dataprotection@possabilities.org.uk](mailto:dataprotection@possabilities.org.uk)

Our websites use cookies and similar technologies to improve functionality, recognise you and to customise your experience. You can reject and block cookies in your browser settings. *Please see our **Cookie Notice** at the end of this document for more information.*

## 2. Information we collect from you

We collect information when you or your family member use our services.

In particular:

- We keep information you give us directly such as contact details (including name, email, address and telephone number), comments, date of birth, gender, feedback, and competition entries.
- We record and analyse web visits.
- If you engage with us online via our websites our cookies and similar technologies will capture your IP address, your location, and record how you use the site to help improve it and improve your user experience, where your browser settings or permission allows for this.
- If you post information online about us or provide feedback, we may keep a record.
- If there is an incident, we may need to log information about it.
- If you contact us directly and complain or give feedback, receive compensation, or enter a competition, we will record details and all related information such as emails, letters and phone calls.
- We use CCTV in our services for the prevention and detection of crime and for safety and security reasons.

## 3. Information we receive from third parties

We may receive your information from other people. This can happen when:

- Someone refers you to our service for support.
- Someone provides information which is relevant to your care and support

## 4. How we use information and the legal basis

We are allowed to use your data only if we have a proper reason to do so such as:

- To fulfil a contract we have with you;
- When it is in our legitimate interest;
- When you consent to it; or
- To comply with the law.

A legitimate interest is when we have a business or commercial reason to use your data. This involves us making an assessment of when we can rely on our legitimate interests. For more information on this assessment please contact [dataprotection@possabilities.org.uk](mailto:dataprotection@possabilities.org.uk)

We take information to communicate with you, check your identity, collect payments and provide services. To run our business and pursue our legitimate interests, we use your information.

Our legitimate interests include keeping our records up to date, fulfilling our legal, compliance and contractual duties, working out which of our services may interest you, improving our services, developing new products and services, and telling you about them.

To run and promote our business, we may use your information to prevent, investigate and/or report fraud, terrorism, misrepresentation, security incidents or crime, including where we are required to do so by law we may monitor and review CCTV, record communications and emails.

To comply with law, assess and uphold legal or contractual rights and claims, and for monitoring, auditing and training on compliance matters:

- We keep records and pass your data to our insurers when necessary (for further details see Data sharing below).
- We monitor, and record communications, including incoming and outgoing calls and emails.
- We may verify your identity.
- We keep records to comply with health and safety legislation, including logging accidents.

### ***We may, if you give us consent***

- Send you updates, newsletters and information about the services we provide
- Use cookies or similar technologies on the website, including analytic cookies. For more details on our use of such technologies, see our **Cookie Notice** at the end of this document.
- Use data for other purposes where we explain that purpose when we ask for your consent.

When you give consent, you are able to withdraw that consent at any time by contacting us, for instance by emailing [dataprotection@possabilities.org.uk](mailto:dataprotection@possabilities.org.uk)

If you do so we can only continue to use your data if another legal basis applies, such as when we're required to do something by law.

***When the law requires us to process your data we will do so. This can include***

- Legal, compliance, regulatory and investigative purposes, including for government agencies and law enforcement.
- When you exercise your rights under data protection legislation, including when you ask to subscribe or unsubscribe from our marketing communications.

You have an absolute right to opt-out of updates and newsletters at any time. You can opt out by emailing [dataprotection@possabilities.org.uk](mailto:dataprotection@possabilities.org.uk)

## 5. Data sharing

PossAbilities may share your data with other agencies who support us with legal advice, IT, safety and security, including CCTV, and other services.

Personal data may be shared with government authorities and/or law enforcement officials for the prevention or detection of crime, if required by law or if required for a legal or contractual claim.

If our business is to be integrated with another business relevant information will be passed to the new providers and you would be notified.

## 6. Cookies and similar technologies

Our website, apps and marketing emails use cookies and similar technology. Full information below in our **Cookie Notice**. This includes information on how to adjust your browser settings to accept or reject cookies.

## 7. Data retention

We keep your data to enable us to fulfil our contract with you or to provide services.

We always look to keep your data for the minimum time in line with data protection principles and our processes. We have a data retention schedule which is available upon request.

If you unsubscribe from update communications, we keep a record of this request indefinitely to ensure we do not send you direct this information again.

We may keep your data for longer if we cannot delete it for legal, regulatory or technical reasons.

## 8. Your rights

You have rights over your personal data.

You can:

- ask for a copy of your information;
- ask for information to be corrected;
- ask for information to be erased or deleted (right to be forgotten);
- ask for us to limit or restrict processing;
- object to us processing your data. The right to object does not apply if we must process the data to meet a contractual or legal requirement;
- ask us to send you a copy in a structured digital format or ask for us to send it to another party (data portability).

Some rights, however, may be limited. We may be obliged by law or regulation to keep information. We must respect other people's privacy as well, which means we may need to redact or remove information where it includes personal data about someone else, even if it is connected to your data. On occasion there may be a compelling legitimate interest to keep processing data.

If you want a copy of your data, to object to how we use your data, or ask us to delete it or restrict how we use it or, please see '**Contact details**' below. To process a request from you, we may need to confirm your identity to ensure we're accessing the right data.

You have a right to complain to an EU data protection authority and in the UK, the authority is the Information Commissioner's Office (the "ICO").

## 9. Contact details

To exercise any of your rights or to withdraw consent you can email: [dataprotection@possabilities.org.uk](mailto:dataprotection@possabilities.org.uk)

For any queries relating to data protection please contact [dataprotection@possabilities.org.uk](mailto:dataprotection@possabilities.org.uk) or by writing to them at Data Protection Lead, PossAbilities, Head Office, Cherwell Wellbeing Hub, Cherwell Avenue, Heywood, OL10 4SY

If we make any changes or updates to this notice, we will communicate these.

# Cookie Notice

## Cookies Are In Use on This Site

### Cookies and how they Benefit You

Our website uses cookies, as almost all websites do, to help provide you with the best experience we can.

Cookies are small text files that are placed on your computer or mobile phone when you browse sites.

Our cookies help us:

- Make our website work as you'd expect
- Save you having to login every time you visit the site
- Remember your settings during and between visits
- Improve the speed/security of the site
- Allow you to share pages with social networks like Facebook
- Continuously improve our website for you

We do not use cookies to:

- Collect any personally identifiable information
- Collect any sensitive information
- Pass data to advertising networks
- Pass personally identifiable data to third parties

You can learn more about the cookies we use below

### Granting us permission to use cookies

If the settings on your software that you are using to view this website (your browser) are adjusted to accept cookies we take this, and your continued use of our website to mean that you are fine with this. Should you wish to remove or not use cookies from our site you can learn how to do this below, however doing so will likely mean that our site will not work as you would expect.

### More about our Cookies

#### Website Function Cookies

#### Our own cookies

We use cookies to make our website work including:

- Determining if you are logged in
- Remembering your search settings
- Remembering your preferences such as text size

There is no way to prevent these cookies being set other than to not use our site.

### **Third party functions**

Our site, like most websites, includes functionality provided by third parties. A common example is an embedded YouTube video. Disabling these cookies will likely break the functions by these third parties.

### **Social Media Cookies**

So you can easily “Like” or share our content on likes of Facebook and Twitter we have included sharing buttons on our site.

The privacy implications on this will vary from social network to social network and will be dependent on the privacy settings you have chosen on these networks.

### **Anonymous Visitor Statistics Cookies**

We use cookies to compile visitor statistics such as how many people have visited our website, how long they spend on the site, and the country they live in. These so-called analytics helps us to continually improve our website including the information we provide.

### **Turning Cookies off**

You can usually switch cookies off by adjusting your browser settings to stop it from accepting cookies. Doing so however will likely limit the functionality of ours and a large proportion of the world’s websites as cookies are a standard part of most modern websites