

# Privacy Notice

Service users



## What is the purpose of this document?

This Privacy Notice sets out how we handle and use personal data that we collect about you. Where in this statement we refer to 'we' or 'our' or 'us' we are referring to George House Trust and where we refer to 'you' or 'your' we are referring to you as one of our service users.

George House Trust collects and processes personal data about you during and after your relationship with us in order to manage that relationship. We are committed to being transparent about how we collect and use your data to meet our obligations under the General Data Protection Regulation (GDPR). We understand our obligations to help you understand how and why we process your personal data.

This Notice tells you about these uses and should be read in conjunction with the Privacy Policy.

George House Trust is registered with the Information Commissioner's Office (ICO) with registration number Z2788095.

We will process the personal information you provide for our legitimate charitable interests and to enhance your experience of our services. This includes contacting you about relevant appointments, events, courses, sessions or news.

## What personal information do we collect and how is it used?

Personal information means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

Data we collect	What we use it for
Names, addresses, telephone numbers, email addresses	To contact you to discuss our work with you, to keep you updated on services or activities and events; to record any work that we do with you
Information on health or medical conditions, special needs such as access requirements	To confirm service eligibility, to carry out our legal duties (e.g. to ensure Health and Safety)

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Data we collect	What we use it for
A record of the work we do with you and our interactions with you, such as 1:1 support or attendance at events	For statistical data analysis and reporting to funders, complaint investigation, safeguarding and signposting
Gender, sexual orientation, gender identity, preferred pronoun, preferred name, ethnicity, country of origin, first language, immigration status, date of birth	For statistical data analysis, reporting, and service development
Dependent children	To assess whether HIV testing is appropriate or necessary
Personal financial information	Where support is requested to advocate or negotiate with third parties on money matters; where financial applications to external organisations require this information
IP Addresses	As an extra cyber security measure, we may log the IP address of the computer used to email us a contact form as part of our registration process. This type of data does not normally identify an individual in the UK.

Some of the above grounds for processing will overlap and there may be several grounds which justify our use of your personal information. If you are unable to provide certain information when requested, we may be unable to provide you with services, or we may be prevented from meeting our legal obligations (such as to ensure your Health and Safety).

We will only use your personal information for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason, and that reason is compatible with the original purpose. If we need to use your data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal information without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

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## How is your personal information collected?

We collect information directly from you through our Service User Form, our Health and Well Being Assessment, or our on-line web forms. We may also collect information about you from an external referral form. We may collect personal information in the course of supporting you.

## How we use particularly sensitive personal information

We do not need your consent if we use special categories of your personal information to carry out our legal obligations. In limited circumstances we may approach you for your written consent to allow us to process certain particularly sensitive data, such as Counselling. If we do so, we will provide you with full details of the reason we need it, so that you can carefully consider whether you wish to consent.

## Automated Decision Making

We do not envisage that any decisions will be taken about you using automated means, however we will notify you in writing if this position changes.

## Who has access to your data?

Your information may be shared internally, including with staff members responsible for managing and administering services, specific projects or Health and Safety. Your personal data may also be shared with some volunteers who have relevant permissions in order to carry out their role such as Counsellors, Peer Mentors and other supervised volunteer functions.

We may have to share your data with third parties, including third-party service providers, for example in connection with supporting our Customer Relationship Management (CRM) system and IT network (including remote support) and professional advisers where necessary, who may be party to confidential discussions related to an individual.

We require third parties to respect the security of your data and treat it in accordance with the law. We will share your information with third parties where required by law, where it is necessary to administer our relationship with you or where we have another legitimate interest. All our third party service providers are required to take appropriate security measures to protect your personal information in line with our policies. We only permit them to process your personal data for specified purposes and in accordance with our instructions.

We do not sell your personal data to third parties under any circumstances, or permit third parties to sell on the data we have shared with them.

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## Data Security

George House Trust takes the security of your data seriously. We have internal policies and controls in place to ensure that your data is not lost, accidentally destroyed or altered, misused or disclosed, or subject to unauthorised access. Where necessary, we implement appropriate network access controls, user permissions and encryption to protect data.

Where we engage third parties to process personal data on our behalf, they do so on the basis of written instructions, are under a duty of confidentiality and are obliged to implement appropriate technical and organisational measures to ensure the security of data.

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.

## Data Retention

We will only retain your personal information for as long as necessary to fulfil the purposes we collected it for, including the purposes of satisfying any legal, accounting or reporting requirements. Details of retention periods, archiving and destruction policies for different aspects of your personal information are available in our Record Retention Policy which is available from the person responsible for data protection.

## Your legal rights

As a data subject, you have a number of rights, details of which can be found at <https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/>

If you have provided your consent to the collection, processing and transfer of your personal data for a specific purpose, you have the right to withdraw your consent at any time.

If you make changes to your consent, records will be updated as soon as we possibly can. Email communications will be stopped immediately where unsubscribe is clicked or if communication preferences are updated online.

Requests for updates to contact preferences received by email, given by phone or in person may take up to 30 calendar days to process, including stopping any postal communications.

Once confirmed, we will no longer process your information for the purpose you originally agreed to, unless we have another legitimate basis for doing so in law.

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If you believe that George House Trust has not complied with your data protection rights, you can complain to the Information Commissioner (ICO).

### **Accessing your data**

You have a right to access your personal data and to have any inaccuracies corrected. There is no fee to pay for accessing personal data. However, if it is believed that the request is unfounded, or excessive, a reasonable charge may be made or a refusal to comply with the request given.

Where an individual wishes to exercise these rights, they may need to prove their identity. This is another appropriate security measure to ensure that personal data is not disclosed to any person who has no right to receive it. Any request will receive a response within 30 calendar days.

Individuals also have the right to request that personal data is erased; to object to the processing of their personal data and for a restriction on processing their personal data. Any request will receive a response within 30 calendar days.

### **Changes to this privacy notice**

We reserve the right to update this privacy notice at any time, and we will provide you with a new privacy notice when we make substantial updates. We may also notify you in other ways from time to time about the processing of your personal information.

### **Queries and Further Information**

George House Trust (75-77 Ardwick Green North, Manchester, M12 6FX) is the Data Controller.

For any queries, please email George House Trust at [mydata@ght.org.uk](mailto:mydata@ght.org.uk).