**Age Better in Sheffield Data Privacy Policy**

This Privacy Policy explains what Age Better in Sheffield (ABiS) will do with your personal data, whether we are in the process of helping you find support, providing you with another service, or if you are visiting our website.

This privacy policy describes how we collect, use and process your personal data, and how, in doing so, we comply with our legal obligations to you.

This privacy policy applies to the personal data of our Website Users and customers.

For the purpose of applicable data protection legislation (including but not limited to the General Data Protection Regulation (Regulation (EU) 2016/679) (the “**GDPR**”), the company responsible for your personal data is (“Age Better in Sheffield” or “us”).

**What kind of personal data do we collect?**

Customers

In order to provide the best possible service to you, we need to process certain information about you. We only ask for details that will genuinely help us to help you.

Depending on the relevant circumstances and applicable local laws and requirements, we may collect some or all of the information listed below to enable us to provide you with the best possible service. In some jurisdictions, we are restricted from processing some of the data outlined below. In such cases, we will not process the data in those jurisdictions:

* Name;
* Age/date of birth;
* Sex/gender;
* Photograph;
* Marital status;
* Contact details;
* Emergency contacts and details of any dependants;
* Referee details;
* Immigration status (whether you need a work permit);
* Nationality/citizenship/place of birth;
* Diversity information including racial or ethnic origin, religious or other similar beliefs, and physical or mental health, including disability-related information;
* Extra information that you choose to tell us;
* IP address;
* The dates, times and frequency with which you access our services; and
* CCTV footage if you attend our premises.

\*Please note that the above list of categories of personal data we may collect is not exhaustive.

Suppliers:

Usually all we require is contact details of relevant individuals at your organisation so that we can communicate with you, such as names, telephone numbers and email addresses. We also need other information such as your bank details so that we can pay for the services you provide (if this is part of the contractual arrangements between us).

Website Users:

We collect a limited amount of data from our Website Users which we use to help us to improve your experience when using our website and to help us manage the services we provide. This includes information such as how you use our website, the frequency with which you access our website, your browser type, the location you view our website from, the language you choose to view it in and the times that our website is most popular.

How do we collect your personal data?

Customers

There are two main ways in which we collect your personal data:

* Directly from you; and
* From third parties

Via the below methods:

* Personal data that you, the Customer, give to us;
* Personal data that we receive from other sources; and
* Personal data that we collect automatically.

Personal data you give to us

We need to know certain information about you in order to provide the best possible service we can. There are numerous ways you can share your information with us. It all depends on what suits you. These may include

* Entering your details on the Age Better in Sheffield website;
* Emailing or telephoning an Age Better in Sheffield employee
* If you ‘like’ our page on Facebook or ‘follow’ us on Twitter we will receive your personal information from those sites

Personal data we collect automatically

To the extent that you access our website or read or click on an email from us, where appropriate and in accordance with any local laws and requirements, we may also collect your data automatically or through you providing it to us.

Personal data that we receive directly from you

We will receive data directly from you in two ways:

* Where you contact us proactively, usually by phone or email; and/or via our website
* Where we contact you, either by phone or email.

Website Users:

We collect your data automatically via cookies when you visit our website, in line with cookie settings in your browser. When you visit our website there is certain information that we may automatically collect, whether or not you decide to use our services. This includes your IP address, the date and the times and frequency with which you access the website and the way you browse its content. We will also collect data from you when you contact us via the website.

How do we use your personal data?

Customers

The main reason for using your personal details is to provide the best possible service to you. We may also use your personal data for marketing, profiling and diversity monitoring. Where appropriate, we will seek your consent to undertake some of these activities.

Marketing Activities

We may periodically send you information that we think you may find interesting, or to ask for your help with developing our services. In particular, we may wish to use your data for the purposes listed below to:

* enable us to develop and market other products and services;
* to help us gain better understanding of the impact of the Age Better in Sheffield programme for research purposes

\*Please note that this list is not exhaustive.

We need your consent for some aspects of these activities which are not covered by our legitimate interests (in particular, the collection of data via cookies, and the delivery of direct marketing to you through digital channels) and, depending on the situation, we’ll ask for this via an opt-in or soft-opt-in.

Soft opt-in consent is a specific type of consent which applies where you have previously engaged with us (for example by registering to access a service). Under ‘soft opt-in’ consent, we will take your consent as given unless or until you opt out.

Equal opportunities monitoring and other sensitive personal data

We are committed to ensuring that our data processes are aligned with our approach to equal opportunities. Some of the data we may (in appropriate circumstances and in accordance with local law and requirements) collect about you comes under the umbrella of “diversity information”. This could be information about your ethnic background, gender, disability, age, sexual orientation, religion or other similar beliefs, and/or social-economic background. Where appropriate and in accordance with local laws and requirements, we’ll use this information on an anonymised basis to monitor our compliance with our equal opportunities policy. We may also disclose this (suitably anonymised where relevant) data to Clients where this is contractually required or the Client specifically requests such information to enable them to comply with their own employment processes.

This information is what is called ‘sensitive’ personal information and slightly stricter data protection rules apply to it. We therefore need to obtain your explicit consent before we can use it. We’ll ask for your consent by offering you an opt-in. This means that you have to explicitly and clearly tell us that you agree to us collecting and using this information.

We may collect other sensitive personal data about you, such as health-related information, religious affiliation, or details of any criminal convictions if this is appropriate and is required for a role that you are interested in applying for. We will never do this without your explicit consent.

Who do we share your personal data with?

Customers

We may share your personal data with various parties, in various ways and for various reasons. Unless you specify otherwise, we may also share your information with any of our group companies and associated third parties such as our service providers where we feel this will help us to provide you with the best possible service.

Suppliers:

Unless you specify otherwise, we may share your information with any of our group companies and associated third parties such as our service providers and organisations to whom we provide services.

Where appropriate we may share your personal data, in various ways and for various reasons, with the following categories of people:

* Any of our group companies;
* Tax, audit, or other authorities, when we believe in good faith that the law or other regulation requires us to share this data (for example, because of a request by a tax authority or in connection with any anticipated litigation);
* Third party service providers who perform functions on our behalf (including external consultants, business associates and professional advisers such as lawyers, auditors and accountants, technical support functions and IT consultants carrying out testing and development work on our business technology systems);
* Third party outsourced IT and document storage providers where we have an appropriate processing agreement (or similar protections) in place; ➢ Marketing technology platforms and suppliers;

How do we safeguard your personal data?

We are committed to taking all reasonable and appropriate steps to protect the personal information that we hold from misuse, loss, or unauthorised access. We do this by having in place a range of appropriate technical and organisational measures.

If you suspect any misuse or loss of or unauthorised access to your personal information please let us know immediately.

How long do we keep your personal data for?

We will delete your personal data from our systems if we have not had substantial contact with you for as long as it’s relevant.

We will delete your personal data from our systems unless we believe in good faith that the law or other regulation requires us to preserve it (for example, because of our obligations to tax authorities or in connection with any anticipated litigation). After this period, it is likely your data will no longer be relevant for the purposes for which it was collected.

How can you access, amend or withdraw the personal data that you have given to us?

GDPR’s main objectives is to protect and clarify the rights of EU citizens and individuals in the EU with regards to data privacy.

This means that you retain various rights in respect of your data, even once you have given it to us. As detailed below.

To get in touch about these rights, please contact us at dataprotection@syha.co.uk. We will seek to deal with your request without undue delay, and in any event within one month (subject to any extensions to which we are lawfully entitled).

\*Please note that we may keep a record of your communications to help us resolve any issues which you raise.

Right to object:

* If we are using your data because we deem it necessary for our legitimate interests to do so, and you do not agree, you have the right to object. We will respond to your request within 30 days (although we may be allowed to extend this period in certain cases). Generally, we will only disagree with you if certain limited conditions apply.
* This right enables you to object to us processing your personal data where we do so for one of the following four reasons: (i) our legitimate interests; (ii) to enable us to perform a task in the public interest or exercise official authority; (iii) to send you direct marketing materials; and (iv) for scientific, historical, research, or statistical purposes.
* The “legitimate interests” and “direct marketing” categories above are the ones most likely to apply to our Website Users, and Customers. If your objection relates to us processing your personal data because we deem it necessary for your legitimate interests, we must act on your objection by ceasing the activity in question unless:
	+ We can show that we have compelling legitimate grounds for processing which overrides your interests; or
	+ We are processing your data for the establishment, exercise or defence of a legal claim.
	+ If your objection relates to direct marketing, we must act on your objection by ceasing this activity.

Right to withdraw consent:

Where we have obtained your consent to process your personal data for certain activities, or consent to market to you, you may withdraw your consent at any time and we will cease to carry out the particular activity that you previously consented to unless we consider that there is an alternative reason to justify our continued processing of your data for this purpose in which case we will inform you of this condition.

Data Access Requests:

You may ask us to confirm what information we hold about you at any time, and request us to modify, update or delete such information. We may ask you to verify your identity and for more information about your request. If we provide you with access to the information we hold about you, we will not charge you for this unless your request is “manifestly unfounded or excessive”. If you request further copies of this information from us, we may charge you a reasonable administrative cost where legally permissible. Where we are legally permitted to do so, we may refuse your request. If we refuse your request we will always tell you the reasons for doing so.

Right to remove:

In certain situations (for example, where we have processed your data unlawfully), you have the right to request us to “remove” your personal data. We will respond to your request within 30 days (although we may be allowed to extend this period in certain cases) and will only disagree with you if certain limited conditions apply. If we do agree to your request, we will delete your data

Normally, the information must meet one of the following criteria:

* the data is no longer necessary for the purpose for which we originally collected and/or processed them;
* where previously given, you have withdrawn your consent to us processing your data, and there is no other valid reason for us to continue processing;
* the data has been processed unlawfully (i.e. in a manner which does not comply with the GDPR);
* it is necessary for the data to be deleted in order for us to comply with our legal obligations as a data controller; or
* if we process the data because we believe it necessary to do so for our legitimate interests, you object to the processing and we are unable to demonstrate overriding legitimate grounds for our continued processing.

We would only be entitled to refuse to comply with your request for one of the following reasons:

* to exercise the right of freedom of expression and information;
* to comply with legal obligations or for the performance of a public interest task or exercise of official authority;
* for public health reasons in the public interest;
* for archival, research or statistical purposes; or
* to exercise or defend a legal claim
* at times we may need to retain data for safe guarding or child protection puposes, relating to issues involving vulnerable people such so those affected by drug dependencies or mental health conditions.

When complying with a valid request for the removal of data we will take all reasonably practicable steps to delete the relevant data.

Right to restrict processing:

You have the right to request that we restrict our processing of your personal data in certain circumstances. This means that we can only continue to store your data and will not be able to carry out any further processing activities with it until either: (i) one of the circumstances listed below is resolved; (ii) you consent; or (iii) further processing is necessary for either the establishment, exercise or defence of legal claims, the protection of the rights of another individual, or reasons of important EU or Member State public interest.

The circumstances in which you are entitled to request that we restrict the processing of your personal data are:

* where you dispute the accuracy of the personal data that we are processing about you. In this case, our processing of your personal data will be restricted for the period during which the accuracy of the data is verified;
* where you object to our processing of your personal data for our legitimate interests. Here, you can request that the data be restricted while we verify our grounds for processing your personal data;
* where our processing of your data is unlawful, but you would prefer us to restrict our processing of it rather than erasing it; and
* where we have no further need to process your personal data but you require the data to establish, exercise, or defend legal claims.

If we have shared your personal data with third parties, we will notify them about the restricted processing unless this is impossible or involves disproportionate effort. We will, of course, notify you before lifting any restriction on processing your personal data.

Right to rectification:

You also have the right to request that we rectify any inaccurate or incomplete personal data that we hold about you. If we have shared this personal data with third parties, we will notify them about the rectification unless this is impossible or involves disproportionate effort. Where appropriate, we will also tell you which third parties we have disclosed the inaccurate or incomplete personal data to. Where we think that it is reasonable for us not to comply with your request, we will explain our reasons for this decision.

Our legal bases for processing your data

Legitimate Interests

Article 6(1)(f) of the GDPR is the one that is relevant here – it says that we can process your data where it “is necessary for the purposes of the legitimate interests pursued by [us] or by a third party, except where such interests are overridden by the interests or fundamental rights or freedoms of [you] which require protection of personal data.”

You do have the right to object to us processing your personal data on this basis.

Customers

We have to make sure our services run smoothly, so that we can carry on providing the best possible services to our customers like you. We therefore also need to use your data for our internal administrative activities, like invoicing where relevant to ensure our services are paid for.

Suppliers:

We use and store the personal data of individuals within your organisation in order to facilitate the receipt of services from you as one of our Suppliers. We also hold your financial details, so that we can pay you for your services. We deem all such activities to be necessary within the range of our legitimate interests as a recipient of your services.

What are cookies and how do we use them?

A “cookie” is a bite-sized piece of data that is stored on your computer’s hard drive. They are used by nearly all websites and do not harm your system. We use them to track your activity to help ensure you get the smoothest possible experience when visiting our website. We can use the information from cookies to ensure we present you with options tailored to your preferences on your next visit. We can also use cookies to analyse traffic and for advertising purposes.

If you want to check or change what types of cookies you accept, this can usually be altered within your browser settings.

Most web browsers will accept cookies but if you would rather we didn’t collect data in this way you can choose to accept all or some, or reject cookies in your browser’s privacy settings. However, rejecting all cookies means that you may not be able to take full advantage of all our website’s features. Each browser is different, so check the “Help” menu of your browser to learn how to change your cookie preferences.

Cookies can also be categorised as follows:

* Strictly necessary cookies: These cookies are essential to enable you to use the website effectively, such as when applying for a job, and therefore cannot be turned off. Without these cookies, the services available to you on our website cannot be provided. These cookies do not gather information about you that could be used for marketing or remembering where you have been on the internet.
* Performance cookies: These cookies enable us to monitor and improve the performance of our website. For example, they allow us to count visits, identify traffic sources and see which parts of the site are most popular.
* Functionality cookies: These cookies allow our website to remember choices you make (such as your user name, language or the region you are in) and provide enhanced features. For instance, we may be able to provide you with news or updates relevant to the services you use. These cookies can also be used to remember changes you have made to text size, font and other parts of web pages that you can customise. They may also be used to provide services you have requested such as viewing a video or commenting on a blog. The information these cookies collect is usually anonymised.

Keeping information secure

We invest significant resources to protect your personal information, from loss, misuse, unauthorised access, modification or disclosure. However, no internet-based site can be 100% secure and so we cannot be held responsible for unauthorised or unintended access that is beyond our control.

Complaints Process

If you have a complaint about how we have handled your personal information you may contact us using the details below and we will investigate your complaint.

Phone us on 0114 2900 200

Email us at performanceandplanning@syha.co.uk

Or Write to us at ‘Complaints, 43-47 Wellington Street, Sheffield, S1 4HF’.

If you are not satisfied with our response, or believe we are not processing your data in accordance with the law you have the right to lodge a complaint with the Information Commissioner’s Office (ICO). Their details are supplied below:

**Address:**
Information Commissioner’s Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

**Telephone:**
0303 123 1113

**Website:** [www.ico.org.uk](https://www.ico.org.uk/)

Terms of Use

This Privacy Policy governs the ways in which we collect and use information about you through the Site. For the terms and conditions which apply to your use of this Site, please refer to the Terms of Use.

Updates

We keep this Policy under regular review and update it from time to time. Please review this policy periodically for changes.

If you do not accept the amended Policy, please stop using this Site.

Contact

If you have any questions about this Policy, or would like to exercise your rights with respect to your personal information, please contact our Data Protection Officer (DPO) Samm Brownley DataProtection@syha.co.uk.

Please note we will only use your information in accordance with this Policy, or where we are required or authorised by law to disclose your information to others, or have your permission to do so.