|  |  |
| --- | --- |
| Policy |  **Privacy Notice** |
| Date adopted | March 2021 |
| Date to be reviewed | 2024 |

**Privacy Notice**

Our privacy policy provides you with details of the information that VASA collects and uses about you, the data subject.

VASA is registered as a ‘data controller’ and ‘processor’ under the General Data Protection Regulations (GDPR) because we collect and process personal information about you.

We collect, process and hold your information in order to provide our transport and community services.

This Policy explains how we use and share your information.

Information may be collected on a paper or online form, by telephone, email, by a member of our staff, or by one of our volunteers.

**Data subjects**

A data subject may be

* A service user
* A carer
* An emergency contact
* A volunteer
* A trustee
* A member of staff

**Why do we collect information about you?**

We need to collect and hold information about you, in order to:

* confirm your identity to provide some services.
* contact you by post, email or telephone.
* understand your needs to provide the services that you request.
* understand what we can do for you and inform you of other relevant services and benefits.
* obtain your opinion about our services.
* update your customer record.
* make sure we meet our statutory obligations including those related to diversity and equalities.
* help us to build up a picture of how we are performing at delivering services to you and what services are needed.

It is important to be aware that we may not be able to provide you with a service unless we have enough information, or your consent to use that information.

We process personal data including but not limited to:

* Name, address and contact details
* Correspondence with you, which may include information you have provided
* Information regarding your personal circumstances
* Information regarding living individuals (e.g., emergency contacts)
* Financial details (such as BACS payments)
* Data provided to prove your identity

We process sensitive data such as:

* Physical or mental health conditions
* On occasion we may collect children’s data from a parent, guardian or professional.

This personal data will include the child’s name and address, it may also include the school which the child attends and in limited circumstances health data.

This data is collected under the GDPR category of consent.

**How we use your information**

We will use the information you provide in a manner that conforms to the GDPR.

We will endeavour to keep your information accurate and up to date and not keep it for longer than is necessary.

In some instances, the law sets the length of time information has to be kept.

We will process your information for the following purposes:

* + for the service you requested, and to monitor and improve VASA performance in responding to your request .
	+ to allow us to be able to communicate and provide services and benefits appropriate to your needs.
	+ to ensure that we meet our legal obligations.
	+ to prevent and detect fraud or crime.
	+ to process financial transactions

We will not pass any personal data on to third parties, other than to those who process information on our behalf, or because we are required or allowed to do so by law.

We will only do so after we have ensured that sufficient steps have been taken to protect the personal data by the recipient.

We will not disclose any information that you provide ‘in confidence’ to us, to anyone else without your consent, except in the few situations where disclosure is required by law, or where we have good reason to believe that failing to share the information would put someone else or yourself at risk.

You will be told about this.

**Data Retention**

The data that we hold on data subjects, is only held on our systems to enable us to deliver support to data subjects.

We will only hold data needed to provide the service and for the minimal amount of time needed by law.

Data will be stored within the European Union and not transferred to any third-party country or International organisation.

**Telephone calls and emails**

When using any of our services or making an enquiry about our services or to volunteer, you will be required to give your contact number, address and email address.

We will then use this data to contact you and provide the service that you require.

We will inform you if we record or monitor any telephone calls you make to us. This will be used to increase your security, for our record keeping of the transaction, and for our staff training purposes.

If you email us we may keep a record of your contact, your email address and the email for our record keeping of the transaction.

We suggest that you keep the amount of confidential information you send to us via email to a minimum or contact us by telephone or post instead.

**Using our website**

Our website does not store or capture personal information.

It does not use automated decision making or profiling.

It will log a number called your IP address which is automatically recognised by the system.

Our web team use Google Analytics to record visitors' use of the site and we use this information to inform our changes to the layout of our website and to the information in it.

Log files do not contain any personal data and they are not used to identify any individual patterns of use of our website.

Our systems will capture and record personal information if you:

* + apply for services that require personal information,
	+ contact us and leave your details for us to respond.

Any forms on our website that capture personal information are secure.

**Information sharing**

We may need to pass your information to other people and organisations that provide a service to support your needs.

These providers are obliged to keep your details securely, and we use them only to fulfil your request or deliver the service.

If we wish to pass your sensitive or confidential information onto a third party, we will only do so once we have obtained your consent, unless we are permitted to do so under the GDPR or are legally required to do so.

We may disclose information when necessary to prevent risk of harm to an individual.

We may disclose information to other partners where it is necessary, either to comply with a legal obligation, or where permitted under the GDPR, e.g., where the disclosure is necessary for the purposes of the prevention and / or detection of crime. In some of these arrangements we may become joint data controllers or data controllers in common with the other organisation(s).

**How we protect your information**

Our aim is not to be intrusive, and we won't ask unnecessary questions.

The information you provide will be subject to rigorous measures and procedures to make sure it can't be seen, accessed or disclosed to anyone who shouldn't see it.

We provide training to staff who handle personal information and treat it as a disciplinary matter if they misuse or do not look after your personal information properly.

We will not keep your information longer than it is needed or where the law states how long this should be kept.

We will dispose of paper records or delete any electronic personal information in a secure way.

**Data subjects rights**

You have the following rights under GDPR:

* + Right to access the data held by us
	+ Right to rectification
	+ Right to erasure (right to be forgotten)
	+ Right to have any data processing restricted
	+ Right to data portability
	+ Right to object

**Right to access**

You are entitled to request access to any information about you that we hold.

To request information, you should contact the Charity Manager using the contact details below.

**Right to rectification**

We try to ensure that any information we hold about you is correct.

There may be situations where you find the information we hold is no longer accurate and you have the right to have this corrected.

**Right to erasure/be forgotten**

You have the right to request that VASA stops processing your personal data in relation to any service that we offer.

However, this may cause delays or prevent us delivering a service to you.

Where possible we will seek to comply with your request, but we may be required to hold or process information to comply with a legal requirement.

**Right to data restriction**

You have the right to ask for a restriction of processing of your data if you believe that:

* + The accuracy of the data held by us is incorrect and you want to contest it
	+ The processing is unlawful
	+ We no longer need to keep the data, but you require it for establishment, exercise or defence of a legal claim
	+ Pending legitimate grounds of interests of controller over the data subject.

This may cause delays or prevent us delivering a service to you.

You will be informed by us before any restriction is lifted.

**Right to Data Portability**

You have the right to ask us to move/transfer your data to another organisation.

We will provide this information in an appropriate and readable form such as a CSV file.

We will aim to fulfil this request within one month of the request been made unless the request is complex.

**Right to Object**

You can contact us directly regarding any of these rights, please see the address details provided below.

Alternatively, for objections and complaints, you can also contact the UK supervisory body the ICO at <https://ico.org.uk>.

**Notifications**

Notification is the process where organisations register what personal data they use and how they use it with the Information Commissioner (ICO).

The Data Protection Act 1998 requires every data controller who is processing personal data to notify unless there is a legal reason for them not to.

Each entry includes the name and address of the data controller and a general description of the processing of personal data by a data controller.

You can consult the register to find out what processing of personal data is being carried out by a particular data controller.

You can search the ICO's Register of Data Controllers to see our notification details.

Our registration number is Z5845215

**Changes to this Privacy Statement**

We may make changes to this Privacy Statement from time to time.

Changes will be published on our website and in any literature containing the Statement.

We therefore recommend that you consult this Privacy Statement regularly, so that you are aware of such changes.

This privacy statement will never be modified to read that we may share or sell your personal information without either explicit consent or without a contract between you and such a third party.

**Contact Information**

Post: VASA

 3 Arden Court

Arden Street

Stratford upon Avon

CV37 6NT

Phone: 01789 262889

Email: privacy@vasa.org.uk