



Client Privacy Statement

This notice explains what personal data (information) we hold about you, how we collect it, and how we use and may share information about you whilst we are working with you and for a period thereafter. It also explains your rights under the law relating to your personal data. We are required to notify you of this information under data protection legislation. Please ensure that you read this notice (sometimes referred to as a 'Privacy Notice') and any other similar notice we may provide to you from time to time when we collect or process personal information about you.

Who collects and uses the information?

THAW Orkney (the 'Organisation') is a 'data controller' and gathers and uses certain information about you. As the organisation is also a 'data processor', we will process information received from third parties about you.

THAW Orkney is a Scottish Charitable Incorporated Organisation (registration number SCO45272). Registered address: 2 West Tankerness Lane, Kirkwall, Orkney, KW15 1HR

Right to hold your data

Under Data Protection legislation, THAW needs to have a "lawful basis" for keeping your data, and for using it. There are several types of "lawful basis". One is called "legitimate interests". THAW has a "legitimate interest" in keeping your data to enable us to support you with your personal circumstances and report on the work that we do.

What is personal data/information?

Personal data is defined under data protection laws in the UK and Europe as 'any information relating to an identifiable person who can be directly or indirectly identified'. Personal data is any information about you that enables you to be identified. This would include obvious information such as your name and contact details but could include less obvious information such as identification numbers, electronic location data, and other online identifiers.

About the information THAW will collect and hold

The table set out below summarises the information we collect and hold, how and why we do so, how we use it and with whom it may be shared. We may also need to share some of the categories of personal information set out below with other parties, such as government and/or law enforcement agencies, third party agencies, our professional advisers, our regulators, funders, partners involved with you and your support plan. Usually, information will be anonymised, but this may not always be possible. The recipient of the information will be bound by confidentiality obligations. We may also be required to share some personal information with our funders as is necessary or required to comply with the law. We seek to ensure that our information collection and processing is always proportionate - that is, we only collect and process what we need to, and we only store it for as long as we need to. We will notify you of any changes to information we collect or to the purposes for which we collect and process it.

The information we collect	How we collect the information	Why we collect the information	How we use and may share the information
<p>Your name, contact details (i.e. address, home and mobile phone numbers, email address).</p>	<ul style="list-style-type: none"> • From you. • From an external referrer. 	<ul style="list-style-type: none"> • To enter into an agreement with you to provide you with our services/support. • Legitimate interest: to maintain contact with you in order to support you . • To comply with our legal obligations. 	<ul style="list-style-type: none"> • To provide you with the necessary support/service which you have sought. • Information may be shared with third party agencies, OIC, Department of Working Pensions, relevant Utility Companies, National grant funders, Orkney Care and Repair, relevant local contractors. • Orkney Blide Trust, NHS Orkney. • Specific and relevant partners you are working with and give consent to share information with.
<p>Personal Case Files Personal details including name, date and place of birth, relationship status. Contact details including address, telephone/mobile number, email address. Employment status and National Insurance Number Income including salaries, pensions, benefits and allowances. Bank account details and savings. Details about your home including how</p>	<ul style="list-style-type: none"> • From you. • Partners where applicable. 	<ul style="list-style-type: none"> • To comply with our legal obligations. • “Legitimate interest” – to provide you with information, services and support to meet your personal circumstances. 	<ul style="list-style-type: none"> • To provide you with the necessary support/service which you have sought. • Information may be shared with third party agencies OIC, Department of Working Pensions, relevant Utility Companies, National grant funders, Orkney Care and Repair, relevant local contractors. • Orkney Blide Trust, NHS Orkney.

<p>many other residents live there including their date and place of birth, building type and condition, heating systems and insulation levels.</p> <p>Details about energy usage including type and supplier, account numbers.</p> <p>Notes on discussions between client and THAW Orkney employee.</p> <p>Any other relevant personal circumstances the client wishes to share with THAW Orkney.</p>			<ul style="list-style-type: none"> • Specific and relevant partners you are working with and give consent to share information with. • Anonymised information shared with funders to evidence impact of the work we do.
<p>Health Information</p> <p>Information relating to specific personal mental/physical health.</p> <p>This data is defined as “special category data”. To comply with the data Protection Act THAW must obtain your explicit consent to collect, record, store and process this data.</p>	<ul style="list-style-type: none"> • From you. • From an external referrer. 	<ul style="list-style-type: none"> • “Legitimate interest” – to provide you with information services and support to meet your personal circumstances. 	<p>We will gain signed explicit consent before sharing any ‘special category data’.</p> <ul style="list-style-type: none"> • To provide you with the necessary support/service which you have sought. • Information may be shared with third party agencies OIC, Department of Working Pensions, relevant Utility Companies, National grant funders, Orkney Care and Repair, relevant local contractors. • Orkney Blide Trust, NHS Orkney, specific support groups. • Specific and relevant partners you are working with and give consent to share information with. • Specific grant funders for the

			<p>purpose of accessing grant funding.</p> <ul style="list-style-type: none"> • Anonymised information shared with funders to evidence impact of the work we do.
<p>Electricity Voucher record.</p> <p>Your name, contact details (i.e. address, home and mobile phone numbers, email address). Electricity Supplier and account number. Meter type.</p>	<ul style="list-style-type: none"> • From you. • Partners, where applicable 	<ul style="list-style-type: none"> • “Legitimate interest” – to provide you with information, services and support to meet your personal circumstances. 	<ul style="list-style-type: none"> • Relevant utility company

Where information may be held?

Information may be held at our offices and by third-party agencies, service providers, representatives and agents. We have security measures in place to seek to ensure that there is appropriate security for information we hold.

How long we keep your information

We keep your information for no longer than is necessary. This normally means whilst we are working with you and for six years after our last contact.

Your rights

Under the GDPR, you have the following rights, which we will always work to uphold:

- 1) The right to be informed about the personal data we collect and use about you. This Privacy Notice should tell you everything you need to know, but you can always contact us to find out more or to ask any questions.
- 2) The right to access the personal data we hold about you. This is called making a Subject Access Request. If you make a “subject access request” we will give you a copy of the data we hold about you within one month of the request.
- 3) The right to have your personal data rectified if any of your personal data we hold is inaccurate or incomplete. Please contact us using the details at the bottom to find out more.
- 4) The right to be forgotten, i.e. the right to ask us to delete or otherwise dispose of any of your personal data that we have. Please contact us using the details at the bottom to find out more.
- 5) The right to restrict (i.e. prevent) the processing of your personal data.
- 6) The right to object to us using your personal data for a particular purpose or purposes.
- 7) The right to data portability. This means that you can ask us for a copy of your personal data held by us to re-use with another organisation or business in certain cases.

8) Rights relating to automated decision-making and profiling. We do not use your personal data in this way.

For more information about how we use your personal data or to exercise any of your rights as outlined above, please contact us using the details provided below. Further information about your rights can also be obtained from the Information Commissioner's Office. If you have any cause for complaint about how we use your personal data, you have the right to lodge a complaint with the Information Commissioner's Office. You can contact them through their website at www.ico.org.uk or can call them on 0303 123 1113.

Keeping your personal information secure

We have appropriate security measures in place to prevent personal information from being accidentally lost, used or accessed in an unauthorised way. We limit access to your personal information to those who have a genuine need to know it. Those processing your information will do so only in an authorised manner and are subject to a duty of confidentiality. We also have procedures in place to deal with any suspected data security breach. We will notify you and any applicable regulator of a suspected data security breach where we are legally required to do so.

Changes to what we do

We regularly review and, where necessary, update our privacy information, policies, procedures and privacy notices. If we plan to use your personal information for a new purpose, we will update our documentation and privacy notice, and communicate the changes to you before starting to use the information in a new way. Where we have obtained your consent to process your personal data and we wish to change how we process it, we will seek your consent for the new processing. Sometimes we have to change what we do because of a change in the law or we need to change the way we do things as an organisation and have a legitimate interest for doing so. The latest version of this Privacy Notice will always be available in the THAW office

How to contact us

For information about how we collect, store and process your personal data or for any questions or concerns you might have about data protection please contact Lindsey Johnson (Manager) by calling 01856 878388.

How to complain

We hope that the THAW Manager can resolve any query or concern you raise about our use of your information. If not, contact the Information Commissioner at www.ico.org.uk/concerns/ or telephone: 0303 123 1113 for further information about your rights and how to make a formal complaint.