



## Catalyst Housing Ltd

### Privacy Statement for users of Southall Day Centre

#### Key points:

- **Why do we use your data?** We typically only use your personal information where you come into contact with us either directly or indirectly.
- **Special categories of data:** Depending on the nature of your interaction with us, we may receive information about your health, racial and ethnic origin or religion.
- **Sharing your data:** We will only share your data with our third-party service providers, subsidiaries and other entities in the group or with other organisations as required by law.
- **Security:** We respect the security of your data and treat it in accordance with the law.
- **International transfer:** We shall not transfer your personal data outside of the European Economic Area.

#### 1 Purpose of our privacy notice

- 1.1 Under data protection legislation, Southall Day Centre Limited is required to explain to you why we collect information about you, how we intend to use that information and whether we will share your information with anyone else.
- 1.2 This statement applies to anyone who accesses our day centre.
- 1.3 It is important that you read this statement so that you know how and why we use information about you. It is also important that you inform us of any changes to your personal information so that the information which we hold is accurate and current.

#### 2 Who are we?

- 2.1 We are Southall Day Centre Limited (**Southall**), with the following two day centres: **Western Road**, 20 Western Road, Southall, UB2 5DS and **Lancaster Road**, Sahaara Court, 99 Lancaster Road, Southall, UB1 2QH

#### 3 Our Data Protection Officer

- 3.1 We have appointed a shared Data Protection Officer with other entities in our group. Our Data Protection Officer is responsible for overseeing what we do with your information and monitoring our compliance with data protection laws.
- 3.2 If you have any concerns or questions about our use of your personal data, you can contact our Data Protection Officer by writing to The Data Protection Officer, Catalyst Housing, Ealing Gateway, 26–30 Uxbridge Road, London W5 2AU or by emailing: [data.protection@chg.org.uk](mailto:data.protection@chg.org.uk).



#### 4 Why are we collecting your information?

4.1 We may collect information about users of our day centres for a variety of different reasons where they come into contact with us directly or indirectly during our day to day operations. For example, you may become a member of our day centres, you may attend one of our day centres for an event or activity (such as a drop-in/advice session or a yoga class), you may use one of our cafés, you may hire a room in one of our day centres or you may be a third party provider delivering services at one of our day centres.

#### 5 Types of personal information we use

5.1 We only collect information about you as a result of your interaction with us and we only collect information about you which is relevant to the nature of that interaction. This may include:

- 5.1.1 **personal details** (such as your name and gender);
- 5.1.2 **contact details** (such as your address, personal telephone number and personal email address);
- 5.1.3 **financial information** (such as details of your payment to us for provision of your membership, in hiring out a room to you or when purchasing from our café);
- 5.1.4 **employment status** (where you complete this information on a membership application form or where it is relevant for a service you are accessing);
- 5.1.5 **emergency contacts** (where you complete this information on a membership application form or where it is relevant for a service you are accessing);
- 5.1.6 **details about your carer or someone you provide care to** (where appropriate to your or someone else's membership application or a service you/they are accessing);
- 5.1.7 **videos and photographs of you** (such as CCTV footage and photographs of our members for security purposes).

#### *Special categories of personal data*

5.2 Some of the information which we collect may be special categories of personal data (also called sensitive personal data). Special categories of personal data require a higher level of protection. The special categories of personal data about you which we may collect include:

- 5.2.1 your **race or ethnicity** (for example in CCTV footage or where you have provided this as part of your membership application);
- 5.2.2 your **religious beliefs** (which could be apparent from CCTV footage or where you have provided this as part of your membership application);
- 5.2.3 information about your **health**, including any **disability or care needs** (for example, where you have provided this as part of your membership application or the signing up of one of our services or activities).



## 6 Source of your personal information

- 6.1 The above information which we collect about you will be obtained through a variety of sources which include:
- 6.1.1 from you directly as part of your interaction with us;
  - 6.1.2 from members of your family and/or carers, for example, where they have completed an application for membership on your behalf.

## 7 How and why we use your personal data

- 7.1 We use the types of personal data listed above for a number of purposes, each of which has a "lawful basis". In accordance with the data protection laws, we need a "lawful basis" for collecting and using information about you. There are a variety of different lawful bases for using personal data which are set out in the data protection laws.
- 7.2 We have set out below the different purposes for which we collect and use your personal data, along with the lawful bases we rely on to do so.

Why we use your information	Our lawful basis for using your information
<b>To consider your membership application:</b> Where you have applied to become a member of our day centres.	<b>Contract:</b> It is necessary to use your personal data in order to perform our contract with you or  <b>Consent:</b> Where you have provided your explicit consent for us to use your personal data.*
<b>Use of our membership services:</b> Where you wish to use the services which we provide as part of your membership, we will need to use your personal data as necessary to provide the service to you.	<b>Contract:</b> It is necessary to use your personal data in order to perform our contract with you.  <b>Consent:</b> Where you have provided your explicit consent for us to use your personal data.*
<b>Use of our walk-in services:</b> Where you are a non-member accessing one of our walk-in support groups or other walk-in services.	<b>Consent:</b> Where you have provided your consent for us to use your personal data.
<b>To book you onto an event:</b> Where you have asked us to book you onto an event at one of our day centres (note that some third parties running events at our day centres will liaise with you directly and if so, we may not have access to the information you provide).	<b>Consent:</b> Where you have provided your consent for us to use your personal data.
<b>Hiring of our facilities:</b> Where you hire a room to deliver services or provide an event or activity.	<b>Contract:</b> It is necessary to use your personal data in order to perform our contract with you.



Why we use your information	Our lawful basis for using your information
<b>Finance:</b> Where you are paying for a product or service, such as membership or an item from one of our cafés.	<b>Legitimate interest:</b> It is necessary for our legitimate interests (where they are not overridden by your rights).
<b>Security:</b> We routinely use CCTV cameras for purposes of security in order to protect our day centre staff, members and other visitors. It is possible that you may be captured on CCTV when visiting our premises.	<b>Legitimate interest:</b> It is necessary for our legitimate interests (where they are not overridden by your rights). <b>Public:</b> Where you have made your personal data public.*
<b>Marketing:</b> We may send you marketing or promotional materials where they are relevant to your interactions with us, for example, we may send you information around a service relevant to your employment, financial or healthcare needs.	<b>Legitimate interest:</b> It is necessary for our legitimate interests (where they are not overridden by your rights).
<b>Monitoring and training purposes:</b> We may record telephone calls to our members of staff for training and monitoring purposes.	<b>Legitimate interest:</b> It is necessary for our legitimate interests (where they are not overridden by your rights).
<b>Improving our services:</b> We may ask you to voluntarily complete surveys to help us improve the services which we provide to you.	<b>Consent:</b> Where you have provided your explicit consent for us to use your personal data.*
<b>Law enforcement and investigations:</b> We may share your personal data with law enforcement agencies where we deem it necessary to do so.	<b>Legal obligation:</b> It is necessary in order for us to comply with legal obligations.
* This is an additional lawful basis which we need to rely on in order to use special categories of data such as information about your health	

## 8 What may happen if you do not provide your personal information?

8.1 The impact of your refusal to provide certain information to us when requested will depend on the nature of our interaction with you. For example, where you apply to become a member of our day centres but refuse to provide us with relevant information, we may not be able to consider your application further and provide you with membership.

## 9 Complying with data protection law

9.1 We will comply with data protection law. At the heart of data protection laws are the "data protection principles" which say that the personal information we hold about you must be:



- 9.1.1 used lawfully, fairly and in a transparent way;
- 9.1.2 collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes;
- 9.1.3 relevant to the purposes we have told you about and limited only to those purposes;
- 9.1.4 accurate and kept up to date;
- 9.1.5 kept only as long as necessary for the purposes we have told you about; and
- 9.1.6 kept securely.

## **10 Sharing your information**

- 10.1 We will share your personal information with third parties where we have a lawful basis for doing so.
- 10.2 "Third parties" includes third-party service providers (including contractors and designated agents), subsidiaries and other entities within our group. The types of third parties with which we share your personal data are as follows:
  - 10.2.1 IT service providers;
  - 10.2.2 Security and CCTV providers;
  - 10.2.3 Third party providers who deliver services at our day centres (some third party service providers collect information from you directly);
  - 10.2.4 Ring and ride service, where you have requested this service;
  - 10.2.5 Third party funders that support the services being offered (for example, Ealing Council and the Big Lottery Fund); and
  - 10.2.6 The Police and other law enforcement agencies if required for the purposes of criminal investigations and law enforcement.
- 10.3 We will share your personal information with our parent company and other entities in our group as part of our regular reporting activities on company performance, in the context of a business reorganisation or group restructuring exercise, for system maintenance support, administrative support and hosting of data.

## **11 Transferring your information abroad**

- 11.1 We shall not transfer your personal data outside of the European Economic Area.

## **12 Security of your information**

- 12.1 We have put in place measures to protect the security of your information. Details of these measures are available upon request.



12.2 Third parties will only process your personal information on our instructions and where they have agreed to treat the information confidentially and to keep it secure.

12.3 We have put in place appropriate security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal information to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal information on our instructions and they are subject to a duty of confidentiality.

### **13 Can we use your information for any other purpose?**

13.1 We typically will only use your personal information for the purposes for which we collect it. In limited circumstances we may use your information for a purpose other than those set out in this policy. If we intend to do so, we will provide you with information relating to that other purpose before using it for the new purpose.

13.2 We may use your personal information without your knowledge or consent where such use is required or permitted by law.

### **14 Storing your information and deleting it**

14.1 We will only retain your personal information for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements. Details of retention periods for different aspects of your personal information are available in our retention policy which is available from our Data Protection Officer, by writing to The Data Protection Officer, Catalyst Housing, Ealing Gateway, 26–30 Uxbridge Road, London W5 2AU or emailing [data.protection@chg.org.uk](mailto:data.protection@chg.org.uk).

14.2 To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

14.3 In some circumstances we may anonymise your personal information so that it can no longer be associated with you, in which case we may use such information without further notice to you.

14.4 Once we no longer have a lawful basis for holding your personal data, we will securely destroy your personal information in accordance with our data retention policy.

### **15 Your rights**

15.1 Under certain circumstances, by law you have the right to:

15.1.1 **Request access** to your personal information (commonly known as a “data subject access request”). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.

15.1.2 **Request correction** of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.



- 15.1.3 **Request erasure** of your personal information. This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal information where you have exercised your right to object to processing (see below).
- 15.1.4 **Object to processing** of your personal information where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground. You also have the right to object where we are processing your personal information for direct marketing purposes.
- 15.1.5 **Request the restriction of processing** of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.
- 15.1.6 **Request the transfer** of your personal information to another party.
- 15.2 If you want to review, verify, correct or request erasure of your personal information, object to the processing of your personal data, or request that we transfer a copy of your personal information to another party, please contact our Data Protection Officer by writing to The Data Protection Officer, Catalyst Housing, Ealing Gateway, 26–30 Uxbridge Road, London W5 2AU or emailing [data.protection@chg.org.uk](mailto:data.protection@chg.org.uk).
- 16 Right to withdraw consent**
- 16.1 In the circumstances where you may have provided your consent to the collection, processing and transfer of your personal information for a specific purpose, you have the right to withdraw your consent for that specific processing at any time. To withdraw your consent, please contact our Data Protection Officer. Once we have received notification that you have withdrawn your consent, we will no longer process your information for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so in law.
- 17 Right to complain to the ICO**
- 17.1 You also have the right to complain to the Information Commissioner's Office (the "ICO") if you are not satisfied with the way we use your information. You can contact the ICO by writing to Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF.
- 18 Changes to this privacy statement**
- 18.1 We reserve the right to update this privacy statement at any time, and we will provide you with a new privacy statement when we make any substantial updates. We may also notify you in other ways from time to time about the processing of your personal information.