

## HALIFAX OPPORTUNITIES TRUST PRIVACY NOTICE

Halifax Opportunities Trust (HOT) is registered with the Information Commissioners Office under the Data Protection Act 2018.

We're making it easier for you to find out how we handle your information. This privacy notice ensures that we continue to comply with current privacy laws and regulations and makes it easier for you to find out how we use and protect your personal/sensitive data within Halifax Opportunities Trust. You will be able to view it at: [www.regen.org.uk](http://www.regen.org.uk); [www.childreencentres.co.uk](http://www.childreencentres.co.uk) and it will be displayed in centre/settings. You can also pick up a copy at any of our centres/settings, by asking at reception.

### WHEN YOU USE OUR SERVICES

Personal and sensitive information may be obtained from you by Halifax Opportunities Trust employees in the following formats:

- ▶ on paper
- ▶ electronic
- ▶ by phone
- ▶ email
- ▶ in person

Personal information includes the following information about you and any family members registered and using the services. The information collected will include: title, name, date of birth, address, postcode, email, telephone/mobile numbers.

Personal sensitive information includes the following information about you and any family members registered and using the services. The information collected will include including race, ethnic origin, political opinion, religious beliefs, trade union, physical or mental health, sexual orientation, commission or alleged commission of any offence.

In accordance with your right to be informed when we collect your personal/sensitive information and request your consent to use it, any documentation will include a Privacy Notice explaining:

- ▶ What the information is for, and the lawful basis for processing it
- ▶ Whether the information will be shared and with whom
- ▶ How long the information will be kept for (retention)
- ▶ Your rights including the right to complain to the Data Protection Officer

We collect and process your information in order to provide business, marketing, early education, health, family support, adult education and advice services to you/your family. We will only collect the information required for the specific purpose we have stated at the time of collection for which you have given consent.

We may not be able to provide you with a product or service unless we have enough information, or your permission to use that information.

Any information collected will be stored securely in line with our Data Protection Policy and only for the length of time required in line with our Retention of Documents Policy. Both policies can be obtained at any of our centres/settings, by asking at reception

## WHEN YOU USE OUR WEBSITES

We collect:

- ▶ Information about your online browsing behaviour on our websites and information about when you click on one of our links (including those shown on other organisations' websites).
- ▶ Information about any devices you have used to access our services (including the make, model and operating system, IP address, browser type and mobile device identifiers).

## WHEN WE CONTACT YOU

This may include you taking part in competitions, surveys or questionnaires about our services, we collect and process information.

This includes:

- ▶ Details of the emails and other digital communications (such as text messages) we send to you that you open, including any links in them that you click on.
- ▶ Your feedback and contributions to customer surveys and questionnaires.
- ▶ Invite you to take part in satisfaction surveys, consultations and evaluations in order to improve our services.

## WHEN WE USE CCTV

We have CCTV systems in some of our centres/settings used by members of the public, for the purposes of public and staff safety and crime prevention and detection. In all centres/settings signs are displayed notifying you that CCTV is in operation.

We will only disclose CCTV images to others who intend to use the images for the purposes stated above or where disclosure is legally required or otherwise permitted under the Data Protection Act. CCTV images will not be released to the media for entertainment purposes or placed on the internet.

Images captured by CCTV will not be kept for longer than necessary and in line with our Retention Policy. However, on occasions there may be a need to keep images for longer – for example where a crime is being investigated.

## MARKETING AND MARKETING RESEARCH

This section explains the choices you have when it comes to receiving marketing communications and taking part in market research.

We will send you relevant information and news about our services in a number of ways including by post, text and by email, but only if you have previously registered with us and given consent.

We also like to hear your views to help us to improve our services, so we may contact you for market research purposes. You always have the choice about whether to take part in our market research.

## HOW WE PROTECT YOUR PERSONAL/SENSITIVE DATA

We know how important it is to protect and manage your personal/sensitive data. This section sets out some of the measures we have in place.

We use computer safeguards such as firewalls and data encryption, and we enforce physical access controls to our buildings and files to keep this data safe. We only authorise access to employees who need it to carry out their job responsibilities.

We protect the security of your information while it is being transmitted by encrypting it using secure email (CJSM) when having to send referral forms and information to other service providers.

We enforce physical, electronic and procedural safeguards in connection with the collection, storage and disclosure of personal/sensitive data. We will ask for proof of identity before we share your personal/sensitive data with you.

However, whilst we take appropriate technical and organisational measures to safeguard your personal/sensitive data, please note that we cannot guarantee the security of any personal/sensitive data that you transfer electronically or physically to us.

## SHARING OF PERSONAL DATA WITH OTHER SERVICES.

This section explains how and why we may share personal/sensitive data

We have data sharing agreements in place with carefully selected service providers. We may need to share your information with these service providers in order for them to offer you a service. This sharing will always be done with your explicit consent and will be explained to you at the point of requesting an additional service.

Where we need to share sensitive or confidential information such as children's data, financial data or health information with third parties, we will do so only with your prior explicit consent, or where we are required by law to do so. We will endeavour to ensure wherever possible that appropriate steps have been taken by the recipient to protect personal/sensitive information that is shared.

We may share your information including sensitive or confidential information without consent where it is necessary for the prevention or detection of crime or to prevent risk of harm to an individual.

## TECHNICAL SERVICE PROVISION

We have contracts and data sharing agreements in place with carefully selected service providers that carry out certain data functions on our behalf. These include, for example, companies that help us with technology services, storing and combining data, and processing payments. We only share personal/sensitive data that enables our service providers to provide their services.

## RETENTION OF INFORMATION

We retain your information for as long as you require services for, and the legal time as specified in our retention of documents policy and for the legitimate running of Halifax Opportunities Trust and meeting of our contractual requirements.

## RECTIFICATION

We want to make sure that the personal data we hold about you or your family is accurate and up to date. If any of your details change, please contact Malgorzata Ciewiertnia, Data Protection Officer and we will amend our records within a month of us being informed, including asking third parties to also amend their systems accordingly.

## DATA PORTABILITY

Data portability is the ability to move data among different application programs, computing environments or cloud services. In a cloud computing context, this ability is the data portion of cloud portability, which makes it possible for customers to migrate data and applications between or among cloud service providers (CSPs). Data portability is growing more important as an increasing number of organisations store greater and greater quantities of data in the cloud. Halifax Opportunities Trust only use data portability to back up the electronic systems to ensure that data is securely protected. The organisation that we use for the cloud backups is Risc IT Solution's and their privacy policy can be viewed at: <https://www.riscitsolutions.com/en/privacy-policy>.

## RIGHT TO BE FORGOTTEN

You may also request that we delete personal information that we hold about you and your family. This can be by withdrawing consent to process data by contacting Malgorzata Ciewiertnia, Data Protection Officer. As long as the processing of your or your family's personal data is not required for a legal or safeguarding purpose, you have the right for your entry to be deleted from our systems. We may reject requests that are unreasonable or not required by law or there is a lawful reason to maintain, including those that would be extremely impractical or could require disproportionate technical effort

## AUTOMATED DECISION MAKING AND PROFILING.

Under the Data Protection Act 2018, you have the right not to be the subject to automated decision making and profiling. Automated individual decision-making (means making a decision solely by automated means without any human involvement); and profiling (means automated processing of personal data to evaluate certain things about an individual). Profiling can be part of an automated decision-making process. Halifax Opportunities Trust does not use either of these functions.

## RIGHT OF ACCESS

Under the Data Protection Act 2018, you have the right to see the personal data we hold about you or your family. This is called a Subject Access Request. Your Subject Access Request must be made in writing and must include as much information as possible in order for your request to be dealt with. Your request will be dealt with by Malgorzata Ciewiernia, Data Protection Officer free of charge, within 30 days of us receiving your request. If your request is manifestly unfounded or excessive, the law allows us to charge an administration fee of £10.00 for any requests for information.

## FURTHER INFORMATION

If you have any questions about how we collect, store and use personal/sensitive data, wish to complain or make a Subject Access Request please contact us Malgorzata Ciewiernia, Data Protection Officer at:

Halifax Opportunities Trust  
Hanson Lane Enterprise Centre  
Hanson lane  
Halifax  
HX1 5PG  
Telephone: 01422 399400  
Email: [privacy@regen.org.uk](mailto:privacy@regen.org.uk)