

## Client Privacy Notice

### 1. WHAT IS THE PURPOSE OF THIS DOCUMENT?

LRSN is committed to protecting the privacy and security of your personal information.

This Privacy Notice describes how we collect and use personal information about you during and after your relationship with us, in accordance with the General Data Protection Regulation ("GDPR").

LRSN is a "data controller". This means that we are responsible for deciding how we hold and use personal information about you. We are required under data protection legislation to notify you of the information contained in this Privacy Notice.

This Notice applies to current and former service users of LRSN. This Notice does not form part of any contract of employment or other contract to provide services. We may update this Notice at any time but if we do so, whilst you are a service user of LRSN, we will provide you with an updated copy of this Privacy Notice as soon as reasonably practicable. A copy of this Notice will also be published and available on our website.

It is important that you read and retain this Notice, together with any other Privacy Notice we may provide on specific occasions when we are collecting or processing personal information about you, so that you are aware of how and why we are using such information and what your rights are under the data protection legislation.

### 2. DATA PROTECTION PRINCIPLES

We will comply with data protection law. This says that the personal information we hold about you must be:

- processed lawfully, fairly and in a transparent manner in relation to individuals ('lawfulness, fairness and transparency');
- collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes; further processing for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes shall not be considered to be incompatible with the initial purposes ('purpose limitation');
- adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed ('data minimisation');
- accurate and, where necessary, kept up to date; every reasonable step must be taken to ensure that personal data that are inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay ('accuracy');
- kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed; personal data may be stored for longer periods insofar as the personal data will be processed solely for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes subject to implementation of the appropriate technical and organisational measures required by the GDPR in order to safeguard the rights and freedoms of individuals ('storage limitation');
- processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures ('integrity and confidentiality').

### 3. THE KIND OF INFORMATION WE HOLD ABOUT YOU

Personal data or personal information means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

There are “special categories” of more sensitive personal data which require a higher level of protection.

We will collect, store and use the following categories of personal information about you:

- personal contact details such as your name, title, address, telephone numbers and personal email addresses
- date of birth
- gender
- marital status and dependants
- next of kin and emergency contact information
- national insurance number and financial details including bank account details, if this relates to the work we are undertaking with you

We may also collect, store and use the following “special categories” of more sensitive personal information:

- information about your race or ethnicity, religious beliefs, sexual orientation and political opinions
- information about your health, including any medical conditions, health and medical reports
- information directly or indirectly relating to the reason for which you have contacted LRSN
- retention of criminal records data: The UK GDPR gives extra protection to personal data relating to criminal convictions and offences or related security measures. LRSN will only process criminal offence data when a specific condition for processing in Schedule 1 of the Data Protection Act 2018 ([legislation.gov.uk](https://legislation.gov.uk)) PART 3 (Additional conditions relating to criminal convictions etc)

#### **4. HOW IS YOUR PERSONAL INFORMATION COLLECTED?**

We collect personal information directly from you, and sometimes from a relative, friend or third party who you may put us in contact with or whom we may seek your express permission to contact on your behalf. We may sometimes collect additional information from third parties including family members, third parties whom you give us your express permission to contact on your behalf (including but not limited to your employer, former employer, credit reference agencies, creditors, bank, land agents, GP or other health professionals).

#### **5. HOW WE WILL USE INFORMATION ABOUT YOU**

We will only use your personal information when the law allows us to. Most commonly, we will use your personal information in the following circumstances:

- (i) Where we need to perform the support/work we have agreed to undertake or assist you with.
- (ii) Where we need to comply with a legal obligation.
- (iii) Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.

We may also use your personal information in the following situations, which are likely to be rare:

- (a) Where we need to protect your interests (or someone else’s interests).
- (b) Where it is needed in the public interest (or for official purposes).

##### **5.1 Situations in which we will use your personal information**

We need all the categories of information in the list above primarily to allow us to perform our work with you and to enable us to comply with our legal obligations. The situations in which we will process your personal information are listed below:

- to support you with the reasons for which you have consulted LRSN
- to comply with our legal obligations

##### **5.2 If you fail to provide personal information**

If you fail to provide certain information when requested, we will be limited in the support and assistance we can give to you.

##### **5.3 Change of purpose**

We will only use your personal information for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If we need to use your personal information for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal information without your knowledge or consent in compliance with the above rules, where this is required or permitted by law. We will not release your personal information, without your knowledge or consent, to any third party in any other circumstance.

## **6. HOW WE USE PARTICULARLY SENSITIVE PERSONAL INFORMATION**

“Special categories” of particularly sensitive personal information require higher levels of protection. We need to have justification for collecting, storing and using this type of personal information about you. We have in place an appropriate policy document and safeguards which we are required by law to maintain when processing such data. We may process special categories of personal information:

- (i) With your explicit written consent.
- (ii) Where we need to carry out our legal obligations.
- (iii) Where it is needed in the public interest.

Less commonly, we may process this type of information where it is needed in relation to legal claims or where it is needed to protect your interests (or someone else’s interests) and you are not capable of giving your consent, or where you have already made the information public.

## **7. OUR OBLIGATIONS AS A CHARITY**

We will use your personal information in the following ways:

- to support you with the reasons for which you have consulted LRSN
- to ensure your health and safety, and that of others, and to provide appropriate support as far as we are reasonably able to do so

## **8. DATA SHARING**

We will only share your data with third parties, including third party service providers and other entities, with your permission.

We require third parties to respect the security of your data and to treat it in accordance with the law.

We will share your personal information with third parties where required by law or where it is necessary to comply with our working relationship with you and where there is a legitimate reason and interest to do so.

## **9. DATA SECURITY**

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

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 third parties who have a legitimate and authorised reason and need to know.

We have put in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so.

## **10. DATA RETENTION (How long will you use my information for?)**

We will only retain your personal information for as long as necessary to fulfil the purposes we collected it for, including the purposes of satisfying any legal requirements. 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 an unauthorised use or disclosure of your personal data, the purpose for which we process your personal data and whether we can achieve those purposes through other means, and applicable legal requirements.

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. Once you are no longer a current service user of LRSN, we will retain and securely destroy your personal information in accordance with our data retention policy.

## **11. RIGHTS OF ACCESS, CORRECTION, ERASURE, AND RESTRICTION**

### **11.1 Your duty to inform us of changes**

It is important the personal information we hold about you is accurate and current. Please keep us informed if your personal information changes during your relationship with us.

### **11.2 Your rights in connection with personal information**

Under circumstances, by law you have the right to:

- 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
- request correction of the personal information that we hold about you. This enables you to have any incomplete or any inaccurate information we hold about you corrected
- 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 of your 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
- 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 of or the reason for processing it
- request the transfer of your personal information to another party

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.

### **11.3 No fee usually required**

You will not have to pay a fee to access your personal information (or to exercise any of the other rights). However, we may charge a reasonable fee if your request for access is clearly unfounded or excessive. Alternatively, we may refuse to comply with the request in such circumstances.

### **11.4 What we may need from you**

We may need to request specific information from you to help us to confirm your identity and ensure your right to access the information (or to exercise any of your other rights). This is another appropriate security measure to ensure that personal information is not disclosed to any person who has no right to receive it.

## **12. RIGHT TO WITHDRAW CONSENT**

In the limited circumstances where you 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 in writing. 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.

## **13. DATA PROTECTION OFFICER**

We have appointed a Data Protection Officer to oversee compliance with this Privacy Notice. If you have any questions about this Privacy Notice or how we handle your personal information, please contact the Data Protection Officer. You have the right to make a complaint at any time to the Information Commissioner's Officer, the UK supervisory authority for data protection issues.

LRSN's Data Protection Officer is the Head of Charity.

#### 14. CHANGES TO THIS PRIVACY NOTICE

We reserve the right to update this Privacy Notice at any time. We will provide you with a new Privacy Notice when we make any substantial updates, if we are working with you or providing you with direct support at that time. Our updated Privacy Notice will be uploaded to our website and can be located and accessed on our website.

We may also notify you in other ways from time to time about the processing of your personal information.

If you have any questions about this Privacy Notice, please contact our Data Protection Officer, Amy Thomas, [amy.thomas@lrsn.co.uk](mailto:amy.thomas@lrsn.co.uk)

Version No	Reviewed Date	Reviewed By	Signature	Next Review Date Due
7	26/04/2021	Alison Twiddy		April 2022
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