

Citizens Advice West Northants and Cherwell Privacy Policy

At Citizens Advice West Northants and Cherwell, we collect and use your personal information to help solve your problems, improve our services and tackle wider issues in society that affect people's lives.

This privacy policy explains how we use your information and what your rights are. We handle and store your personal information in line with data protection law and our confidentiality policy. The following pages tell you more about how we use your information in more detail.

Our network

Citizens Advice is a membership organisation made up of the national Citizens Advice charity and many local offices across England and Wales, including us, Citizens Advice West Northants and Cherwell (CAWNAC). CAWNAC is an independent charity and a member of the national Citizens Advice charity.

All members of the Citizens Advice network are responsible for keeping your personal information safe and making sure data protection law is followed.

Members of the network also run some jointly designed services and use some of the same systems to process your personal data. In these instances we are joint data controllers for these activities.

Jointly controlled data

All offices in the Citizens Advice network use some joint systems to carry out our activities. These include joint case management systems, telephony platforms and more.

Staff from a different local Citizens Advice can only access your personal information in a joint system if they have a good reason. For example when:

- you go to a different office to seek advice
- more than one office is working together in partnership
- they need to investigate a complaint or incident

We have rules and controls in place to stop people accessing or using your information when they shouldn't.

Tell an adviser if you're worried about your details being on a national system. We'll work with you to take extra steps to protect your information - for example by recording your problem without using your name.

National Citizens Advice has a <u>privacy notice</u> available on their website that covers general advice and nationally managed systems, including our case management systems. This policy covers the processing we carry out in our office.

How we use your data for advice

This section covers how we use your data to provide you with advice.

For general advice and nationally funded advice programmes please see the national Citizens Advice <u>privacy notice</u>.

How we collect your information

We collect data by asking you to answer questions and recording the answers.

What information we collect

Data may include your name, address, telephone number, email address. The source of the service data is you.

CHIPs do not routinely store your data and your enquiry is recorded anonymously. If a CHIP refers you for advice, the data you supply will be recorded for the purposes of giving you advice.

What we use your information for

We need to know certain things about you to ensure that the advice we give you is correct for your circumstances.

Our confidentiality policy

At Citizens Advice we have a confidentiality policy which states that anything you tell us as part of advice will not be shared outside of the Citizens Advice network unless you provide your permission for us to do so.

There are some exceptions to this such as needing to share:

- to prevent an immediate risk of harm to an individual
- In select circumstances if it is in the best interests of the client
- where we are compelled to do so by law (e.g. a court order or meeting statutory disclosures)
- where there is an overriding public interest such as to prevent harm against someone or to investigate a crime
- to defend against a complaint or legal claim
- to protect our name and reputation for example to provide our side of a story reported in the press

Who we share your information with

We share anonymised data with our funders.

Our lawful basis for using your information

Our legal basis for using your information is "legitimate interest" and "explicit consent".

How we use your data when applying to work or volunteer

How we collect your information

We collect your data by means of an application form

What information we collect

We record your personal data - name, address, date of birth, contact details and some details of your past employment/volunteering.

What we use your information for

We use this information to understand our volunteer body and to communicate with you.

Who we share your information with

We will obtain your consent if we need to share your information for the purposes of a Disclosure and Barring Service check

Our lawful basis for using your information

Our legal basis for using your information is "legitimate interest" and "explicit consent".

How we use your data when using our website

CAWNAC use Google Analytics to analyse the use of our website. Google Analytics gathers information about website use by means of cookies. This data may be stored outside the EU, under a EU-US Privacy Shield agreement. The information gathered relating to our website is used to create reports about the use of our website. Google's privacy policy is available at: https://www.google.com/policies/privacy/.[The relevant cookies are:

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_ga, _gid, _gat, __utma, __utmt, __utmb, __utmc, __utmz and __utmv].
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Managing cookies

Most browsers allow you to refuse to accept cookies and to delete cookies. The methods for doing so vary from browser to browser, and from version to version. You can however obtain up-to-date information about blocking and deleting cookies via these links:

(a)

https://support.google.com/chrome/answer/95647?hl=en Chrome);

- (b) https://support.mozilla.org/en-US/kb/enable-and-disable-cookies-website-preferences (Firefox);
- (c)

http://www.opera.com/help/tutorials/security/cookies/ (Opera);

(d)

https://support.microsoft.com/en-gb/help/17442/windows-internet-explorer-delete-manage-cookies (Internet Explorer);

(e)

https://support.apple.com/kb/PH21411 (Safari); and usability of many websites.

If you block cookies, you will not be able to use all the features on our website.

How long we keep your data for

National Citizens Advice is responsible for managing any data in joint client case records. For more information please see their <u>privacy notice</u>.

We keep your data for 7 years.

If you have shared special characteristic data with us, your records will be kept for 16 years.

Your data protection rights

You have rights in relation to your personal data that we hold. Your rights include being able to request:

- Access to copies of your data
- Corrections are made to inaccurate data
- Deletion of your personal data
- Object to how we use your personal data

These rights are not absolute and may not apply in every circumstance. For more information about your rights you can visit the <u>ICO website</u>.

To make a data protection rights request you can do so by emailing sars@cawnac.org.uk

Raising a concern about how we use your information

If you are concerned about how we have handled your personal information please contact us at data.protection@cawnac.org.uk

You can also contact the national charity if you are unhappy with how we have used your personal data or wish to raise a concern about how a local office has handled your personal data. To do so you can email us at DPO@citizensadvice.org.uk

Contacting the Information Commissioner's Office (ICO)

You can also raise your concern with the Information Commissioner's Office which regulates data protection law in the UK. if you are unhappy with how we have used your personal information. They will normally expect you to have made a complaint to us directly in the first instance.

- Visit the ICO website.
- Address: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF
- Helpline number: 0303 123 1113