

# Simeon Centre Counselling Service: Privacy Policy

We want to reassure you that we are committed to protecting and respecting your privacy, and that your personal information is stored and processed in a fair, lawful and transparent way.

This policy explains the following:

1. Who we are
2. What information we collect about you
3. When we collect your information
4. How your information is used
5. How long we hold your information for
6. Who has access to your information
7. Third party providers working with us
8. Lawful bases for using your information
9. Our communications with you
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11. Security
12. IP addresses and cookies
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## 1. Who we are

The Simeon Centre Counselling Service is a Bolton based charity which was formed in 1999 to offer counselling to local people, free at the point of need. We are registered with the Charity Commission in England and Wales as a charity (No.1098428).

We are a data controller for the purposes of the Data Protection Act 1998 and from 25th May 2018, the EU General Data Protection Regulation 2016/679 ("Data Protection Law"). This means that we are responsible for, and control the processing of, your personal information.

## 2. What information we collect about you

Personal information we collect includes details such as your name, date of birth, email address, postal address, telephone numbers, as well as other information you provide in any interaction with us. This may include **Sensitive Personal Information**.

Data Protection Law recognises that some categories of personal information are more sensitive. Sensitive Personal Information can include information about a person's health, race, ethnic origin, political opinions, sex life, sexual orientation or religious beliefs.

If you share your personal experience or the experiences of a friend or relative, we may also collect this type of information. If you provide us with any Sensitive Personal Information by telephone, email or by other means, we will treat that information with extra care and confidentiality and always in accordance with this privacy policy.

### **3. When we collect your information**

We may collect your information when you interact with us directly. This includes:

- when you ask about, or use the services we provide
- apply to volunteer with us
- apply for a job
- provide us with other personal information (for example, when you wish to donate)

Just to be clear, this may also include when you phone us, visit our website, or get in touch via email or post.

### **4. How your information is used**

The information we collect is to help us deliver a safe and confidential counselling service for local people aged over 16 years old. We will mainly use this information:

- To provide the services that you have requested.
- To keep a record of your relationship with us.
- To update you with important administrative messages about the services you have requested.
- To process your donations and claim Gift Aid on your donations
- To invite you to take part in surveys or research
- Where you volunteer with us, to administer the volunteering arrangement.

### **5. How long we hold your information for**

We only keep it as long as is reasonable and necessary for the relevant activity, which may be to fulfil statutory obligations (for example, the collection of Gift Aid).

### **6. Who has access to your information**

We undertake regular reviews of who has access to information that we hold to ensure that your information is only accessible by appropriately trained staff and volunteers, trusted partners and

contractors. We do not sell or share your information with third parties for marketing and advertising purposes.

## **7. Third Party Service Providers working with us**

We may pass your information to our third-party service providers, trusted partners, subcontractors and other associated organisations for the purposes of completing tasks and providing services to you on our behalf. When we use third party service providers, we disclose only the personal information that is necessary to deliver the service and we have agreements in place requiring them to keep your information secure and not to use it for their own direct marketing purposes.

There may be occasions when a third party service provider transfers personal data to contractors, some of which may not be working or operating in the European Economic Area (i.e. 28 European Union countries + Iceland, Liechtenstein and Norway). When this is the case, we are confident these providers take reasonable measures, including contracts, to ensure personal data has the same data protection level as in the European Union.

## **8. Lawful bases for using your information**

We are processing your personal information on the lawful basis of your, our and our trusted partners' 'legitimate interests'. This means there is a legitimate interest for us to process your information to help us deliver the services you have requested from us or to join us as a volunteer.

Whenever we process your personal information under the 'legitimate interest' lawful basis we make sure that we consider your rights and interests.

Examples of where we have a legitimate interest to process your personal information are:

- where we contact you about services you have requested
- use your personal information for data analytics
- conducting research to better understand who our clients are
- to improve our services
- for our legal purposes (for example, dealing with complaints and claims)
- for complying with guidance from the Charity Commission.

In some cases, we will only use your personal information if we have your consent (for example, to claim Gift Aid on any donations you may make).

## 9. Our communications with you

If you engage in our services or join as a volunteer, we may contact you by phone, email, post or text message.

You can update your preferred methods of communications at any time by one of the following methods: email [counselling@simeoncentre.org.uk](mailto:counselling@simeoncentre.org.uk) ; write to Simeon Centre Counselling Service, Victoria Hall, Knowsley Street, Bolton, BL1 2AS; telephone 01204 387363 or text 07520 633101.

## 10. Your rights

You have various rights in respect of the personal information we hold about you. These are available in detail from the Information Commissioner's Office <https://ico.org.uk/> A summary of the applicable rights is listed below.

### *Access to your personal information:*

You have the right to request a copy of the personal information that we hold about you and we will not make a charge for this. Requests can be made verbally or in writing. We will respond as soon as possible and within 30 days of receiving your request. There may be occasions where we will ask you to provide us with evidence of your identity. We can provide the data electronically if requested.

### *Your right to object:*

You can object to our 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 situation which makes you want to object to processing on this ground. Please contact us with the details of your objection.

### *Withdraw consent:*

If you have given us your consent to use personal information (for example, claiming Gift Aid on any donations you make), you can withdraw your consent at any time.

### *Correct or delete inaccurate information:*

If you think we hold inaccurate information about you, you can ask us to change or delete it where it is no longer necessary for us to use it and where we have no lawful basis for keeping it.

### *Restriction of use:*

You can ask us to restrict the personal information we use about you where you have asked for it to be erased or where you have objected to our use of it.

Please note, some of these rights only apply in certain circumstances and we may not be able to fulfil every request.

If you wish to exercise any of these rights or make a complaint, you can do so by contacting us. You can also make a complaint to the data protection supervisory authority, the Information Commissioner's Office, <https://ico.org.uk/>

## **11. Security**

When you give us personal information, we take steps to ensure that it is kept securely.

Certain details like your name and email address may be transmitted normally over the Internet or in the post and this can never be guaranteed to be 100% secure. While we always strive to protect your security, we cannot guarantee the security of any information you transmit to us in this way and you do so at your own risk. Once we receive your information, we make every effort to ensure its security on our systems.

## **12. IP addresses and cookies**

Currently, we do not collect any information about your computer, including IP addresses and cookies.

## **13. Links to other websites**

Our website contains links to other websites. This privacy policy only applies to our website so when you link to other websites you should read their own privacy policies.

## **14. How to contact us**

If you have any questions about the way we process and store your data, or about our privacy practices, please contact us.

Telephone: 01204 387363

[counselling@simeoncentre.org.uk](mailto:counselling@simeoncentre.org.uk)

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We will review this policy from time to time. It was last updated on 16<sup>th</sup> August 2018.