



## Privacy Notice & Data Retention Policy

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<i>Lead</i>	Jonathan Andrew Greenwood
<i>Author/Lead:</i>	Denise Read



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# PRIVACY NOTICE & DATA RETENTION POLICY FOR GROUP HUG APP

**Data controller:** Jonathan Greenwood trading as Group Hug App.

## 1. Introduction

Jonathan Greenwood trading as Group Hug App is a “data controller”. This means we are responsible for deciding how we hold and use personal information about you.

Jonathan Greenwood trading as Group Hug App “The Social Enterprise” collects, stores and processes personal data relating to its volunteers in order to manage the volunteering relationship. This privacy notice sets down how the Social Enterprise collects and uses personal information about you during and after your working relationship with us.

This privacy notice applies to current and former volunteers, workers and contractors. This notice does not form part of a contract of volunteering or any contract to provide services and may be updated at any time.

The Social Enterprise is committed to protecting the privacy and security of your personal information. The Social Enterprise is committed to being clear and transparent about how it collects and uses that data and to meeting its data protection obligations.

## 2. Data Protection Principles

The Social Enterprise will comply with data protection law. This means the personal information we hold about you must be:

- used lawfully, fairly and in a transparent way
- collected only for valid purposes which we have explained to you clearly and not used in any way which is incompatible with these purposes
- relevant to the purposes we have told you about and limited to those purposes only
- accurate and kept up to date
- kept only for such time as is necessary for the purposes we have told you about
- kept securely.



### 3. What Information Does the Social Enterprise Collect and Process?

The Social Enterprise collects and processes a range of personal information (personal data) about you. Personal data means any information about an individual from which the person can be identified. This includes:

- personal contact details, such as your name, title, address and contact details, including email address and telephone number
- date of birth
- gender
- the terms and conditions of your volunteering
- details of your qualifications, skills, experience and volunteering history, including start and end dates, with the Social Enterprise
- details of any disciplinary or grievance procedures in which you have been involved, including any warnings issued to you and related correspondence
- assessments of your performance, including appraisals, training you have participated in, performance improvement plans and related correspondence

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

- information about medical or health conditions, including whether you have a disability for which the Social Enterprise needs to make reasonable adjustments
- information about your criminal record
- equal opportunities monitoring information, including information about your ethnic origin, sexual orientation, health and religion or belief.

The Social Enterprise collects this information in a variety of ways. For example, data is collected through the application and recruitment process and during Volunteer-related activities throughout the period of volunteering for us.

In some cases, the Social Enterprise collects personal data about you from third parties, such as references supplied by former employers, information from volunteering background check providers, or information from criminal records checks permitted by law.

Data is stored in a range of different places, including in your personnel file, in the Social Enterprise's Accounting systems and in other IT systems (including the Social Enterprise's email system).

### 4. Why Does the Social Enterprise Process Personal Data?

The Social Enterprise needs to process data to enter into a volunteering agreement with you and to meet its obligations under your volunteering agreement.



In addition, the Social Enterprise needs to process data to ensure that we are complying with our legal obligations, for example, we are required to check criminal records for certain positions. It is necessary to carry out criminal records checks to ensure individuals are permitted to undertake a particular role.

In other cases, the Social Enterprise has a legitimate interest in processing personal data before, during and after the end of the volunteering relationship.

## 5. Situations in Which We Will Use Your Personal Information

Situations in which we will process your personal information are listed below.

In order to:

- make decisions about volunteer recruitment and promotion processes
- maintain accurate and up-to-date volunteering records and contact details (including details of whom to contact in the event of an emergency), and records of volunteer contractual and statutory rights
- gather evidence for, and keep a record of, disciplinary and grievance processes, to ensure acceptable conduct within the workplace
- operate and keep a record of volunteer performance and related processes
- keep records of training and development requirements
- ensure effective general HR and business administration
- provide references on request for current or former volunteers
- deal with legal disputes involving you or other volunteers, workers and contractors
- facilitate equal opportunities monitoring in the workplace

## 6. If You fail to Provide Personal Information

If you do not provide certain information when requested, the Social Enterprise may not be able to perform the agreement we have entered into with you.

### Change of Purpose

The Social Enterprise will only use your personal information for the purpose for which it was collected unless we reasonably consider 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 advise you of this and explain the legal basis which allows us to do so.

You should be aware we may process your personal information without your knowledge or consent where this is required or permitted by law.



## 7. How We Use Sensitive Personal Information

Some special categories of personal data, such as information about health or medical conditions, is processed to carry out volunteering law obligations (for example, in relation to volunteers with disabilities and for health and safety purposes).

The Social Enterprise uses other special categories of personal data, such as information about ethnic origin, sexual orientation, health or religion or philosophical belief, this is done for the purposes of meaningful equal opportunities monitoring or reporting.

Data used by the Social Enterprise for these purposes is anonymised or is collected with the express consent of volunteers, which can be withdrawn at any time. Volunteers are entirely free to decide whether or not to provide such data and there are no consequences of failing to do so.

## 8. For How Long Do You Keep Data?

The Social Enterprise will only hold your personal data for as long as is necessary to fulfil the purposes we collected it for, including any legal, accounting or reporting requirements. The periods for which your data is held after the end of volunteering are:

Example of Volunteer data	Statutory retention period
Records relating to volunteers under 18 years	7 years
Volunteering permit records / DBS checks	7 years

## 9. Who Has Access to Data?

Your information will be shared externally, with members of the HR team.

The Social Enterprise shares your data with third parties where required by law, where it is necessary in order to administer the volunteering relationship with you or where we have another legitimate interest in doing so.

## 10. How Does the Social Enterprise Protect Data?

The Social Enterprise takes the security of your data seriously. The Social Enterprise has internal policies and controls in place to prevent your data being lost, accidentally destroyed, misused or disclosed, and is not accessed except by its volunteers in the performance of their duties.



When the Social Enterprise engages third parties to process personal data on its behalf, they do so based on written instructions, are under a duty of confidentiality and are obliged to implement appropriate technical and organisational measures to ensure the security of data.

## 11. Your Duty to Inform Us of Changes

It is important the personal information we hold about you is accurate and current. Please be sure to keep us informed if your personal information changes during your time volunteering with us.

## 12. Your Rights

As a data subject, you have a number of rights. You can:

- access and obtain a copy of your data on request (known as a “data subject access request”)
- require the Social Enterprise to change incorrect or incomplete data
- request erasure of your personal information. This enables you to ask the Social Enterprise to delete or stop processing your data, for example where the data is no longer necessary for the purposes of processing
- object to the processing of your data where the Social Enterprise is relying on its legitimate interests as the legal ground for processing
- ask the Social Enterprise to suspend the processing of your personal data for a period, if data is inaccurate or there is a dispute about its accuracy or the reason for processing it.

If you would like to exercise any of these rights, or you have any questions about the privacy notice, please contact Jonathan Greenwood trading as Group Hug App.

If you believe that the Social Enterprise has not complied with your data protection rights, you have the right to make a complaint to the Information Commissioner’s Office.

## 13. Implementation of Policy

This Notice & Policy shall be deemed effective as of 16<sup>th</sup> May 2021. No part of this Notice or Policy shall have retroactive effect and shall thus apply only to matters occurring on or after this date.