

# Third Sector Together North West London

**Customer Privacy Notice** 

This privacy notice tells you what to expect us to do with your personal information.

- Contact details
- What information we collect, use, and why
- Lawful bases and data protection rights
- Where we get personal information from
- How long we keep information
- How to complain

### Contact details

#### **Post**

3ST , Key House, 106 High Street, Yiewsley, WEST DRAYTON, Middlesex, UB7 7BQ, GB

#### **Telephone**

07510382922

#### **Email**

engagement@3stnwl.org.uk

# What information we collect, use, and why

We collect or use the following information to provide services and goods, including delivery and third party referrals:

- Names and contact details
- Gender



- Pronoun preferences
- Addresses
- Date of birth
- Emergency contact details
- Next of kin details
- Photographs or video recordings
- Call recordings
- Service use history
- Right to work information
- Health information (including medical conditions, test results, allergies, medical requirements and medical history)
- Dietary information (including allergies and health conditions)
- Information about care needs (including disabilities, home conditions, dietary requirements and general care provisions)
- Information about work, home and living conditions
- Information about support requirements
- Information about lifestyle, interests or personal history
- Criminal offence data
- Records of meetings and decisions
- Information about income and financial needs for funding or personal budget support
- Payment details (including card or bank information for transfers and direct debits)
- Website user information (including user journeys and cookie tracking)



• Information relating to compliments or complaints

We also collect or use the following special category information to **provide services and goods, including delivery and third party referrals.** This information is subject to additional protection due to its sensitive nature:

• Racial or ethnic origin

We collect or use the following personal information for the prevention, detection, investigation or prosecution of crimes:

- Names and contact information
- Customer or client accounts and records
- Video recordings of public areas (including indoor and outdoor spaces)
- Video recordings of private or staff only areas
- Call recordings
- Financial transaction information
- Witness statements and contact details
- Information relating to health and safety

We also collect or use the following special category information **for the prevention, detection, investigation or prosecution of crimes.** This information is subject to additional protection due to its sensitive nature:

Racial or ethnic origin

We collect or use the following personal information to **comply with legal** requirements:

- Name
- Contact information
- Identification documents



- Financial transaction information
- Any other personal information required to comply with legal obligations
- Health and safety information
- Safeguarding information

We also collect or use the following special category information to **comply with legal requirements.** This information is subject to additional protection due to its sensitive nature:

• Racial or ethnic origin

We collect or use the following personal information for **recruitment purposes**:

- Contact details (eg name, address, telephone number or personal email address)
- Date of birth
- National Insurance number
- Copies of passports or other photo ID
- Employment history (eg job application, employment references or secondary employment)
- Education history (eg qualifications)
- Right to work information
- Details of any criminal convictions (eg Disclosure Barring Service (DBS), Access NI or Disclosure Scotland checks)

We collect or use the following personal information for **dealing with queries, complaints or claims**:

- Names and contact details
- Address



- Payment details
- Account information
- Purchase or service history
- Video recordings of public areas
- Call recordings
- Customer or client accounts and records
- Financial transaction information
- Information relating to health and safety (including incident investigation details and reports and accident book records)
- Correspondence

We also collect or use the following special category information for **dealing with queries, complaints or claims.** This information is subject to additional protection due to its sensitive nature:

Racial or ethnic origin

## Lawful bases and data protection rights

Under UK data protection law, we must have a "lawful basis" for collecting and using your personal information. There is a list of possible <u>lawful bases</u> in the UK GDPR. You can find out more about lawful bases on the ICO's website.

Which lawful basis we rely on may affect your data protection rights which are set out in brief below. You can find out more about your data protection rights and the exemptions which may apply on the ICO's website:

 Your right of access - You have the right to ask us for copies of your personal information. You can request other information such as details about where we get personal information from and who we share personal information with. There are some exemptions which means you may not receive all the information you ask for. Read more about the right of access.



- Your right to rectification You have the right to ask us to correct or delete personal information you think is inaccurate or incomplete. Read more about the right to rectification.
- Your right to erasure You have the right to ask us to delete your personal information. Read more about the right to erasure.
- Your right to restriction of processing You have the right to ask us to limit how we can use your personal information. Read more about the right to restriction of processing.
- Your right to object to processing You have the right to object to the processing of your personal data. Read more about the right to object to processing.
- Your right to data portability You have the right to ask that we transfer the personal information you gave us to another organisation, or to you. Read more about the right to data portability.
- Your right to withdraw consent When we use consent as our lawful basis you have the right to withdraw your consent at any time. Read more about the right to withdraw consent.

If you make a request, we must respond to you without undue delay and in any event within one month.

To make a data protection rights request, please contact us using the contact details at the top of this privacy notice.

## Our lawful bases for the collection and use of your data

Our lawful bases for collecting or using personal information to **provide** services and goods, including delivery and third party referrals are:

- Consent we have permission from you after we gave you all the relevant information. All of your data protection rights may apply, except the right to object. To be clear, you do have the right to withdraw your consent at any time.
- Contract we have to collect or use the information so we can enter into or carry out a contract with you. All of your data protection rights may apply except the right to object.



- Legal obligation we have to collect or use your information so we can comply with the law. All of your data protection rights may apply, except the right to erasure, the right to object and the right to data portability.
- Legitimate interests we're collecting or using your information because it benefits you, our organisation or someone else, without causing an undue risk of harm to anyone. All of your data protection rights may apply, except the right to portability. Our legitimate interests are:
  - o Processing orders and arranging delivery through third party logistic providers; Communicating order updates service availability and customer support Referring customers customers to trusted third party partners where necessary to complete requested services Improving our services and preventing misuse or fraud. Legitimate Interest We process personal data as a registered non profit organisation in order to fulfil our charitable objectives including; Providing goods or services (care packages, essential supplies ot programme material) Maintaining accurate records of service provision and communications to ensure accountability and improve our service delivery which are important to our mission and delivering support to our communities we serve. We ensure all personal data processing is proportionate, relevant and limited to what is necessary, with clear respect for the rights and freedom of individuals involved.

For more information on our use of legitimate interests as a lawful basis you can contact us using the contact details set out above.

- Vital interests collecting or using the information is needed when someone's physical or mental health or wellbeing is at urgent or serious risk. This includes an urgent need for life sustaining food, water, clothing or shelter. All of your data protection rights may apply, except the right to object and the right to portability.
- Public task we have to collect or use your information to carry out a task laid down in law, which the law intends to be performed by an



organisation such as ours. All of your data protection rights may apply, except the right to erasure and the right to portability.

Our lawful bases for collecting or using personal information for the prevention, detection, investigation or prosecution of crimes are:

- Consent we have permission from you after we gave you all the relevant information. All of your data protection rights may apply, except the right to object. To be clear, you do have the right to withdraw your consent at any time.
- Legal obligation we have to collect or use your information so we can comply with the law. All of your data protection rights may apply, except the right to erasure, the right to object and the right to data portability.
- Legitimate interests we're collecting or using your information because it benefits you, our organisation or someone else, without causing an undue risk of harm to anyone. All of your data protection rights may apply, except the right to portability. Our legitimate interests are:
  - we process personal data to detect and prevent fraud, protect our staff and service users, and ensure the security of our systems and premises.

For more information on our use of legitimate interests as a lawful basis you can contact us using the contact details set out above.

Public task – we have to collect or use your information to carry out a
task laid down in law, which the law intends to be performed by an
organisation such as ours. All of your data protection rights may
apply, except the right to erasure and the right to portability.

Our lawful bases for collecting or using personal information to **comply** with legal requirements are:

 Consent - we have permission from you after we gave you all the relevant information. All of your data protection rights may apply, except the right to object. To be clear, you do have the right to withdraw your consent at any time.



- Contract we have to collect or use the information so we can enter into or carry out a contract with you. All of your data protection rights may apply except the right to object.
- Legal obligation we have to collect or use your information so we can comply with the law. All of your data protection rights may apply, except the right to erasure, the right to object and the right to data portability.
- Legitimate interests we're collecting or using your information because it benefits you, our organisation or someone else, without causing an undue risk of harm to anyone. All of your data protection rights may apply, except the right to portability. Our legitimate interests are:
  - Maintaining accurate financial, donation and service records as required by charity regulators and tax authorities; Complying with laws related to safeguarding, health and safety, of the prevention of fraud and abuse. responding to lawful requests from government bodies, regulators or law enforcement agencies; retaining records to demonstrate accountability and transparency in line with our charitable purposes These processing activities support or legal responsibilities and ensure we operate with integrity and public trust. Where applicable, such data processing may also be necessary for establishing, exercising or defending legal claims.

For more information on our use of legitimate interests as a lawful basis you can contact us using the contact details set out above.

- Vital interests collecting or using the information is needed when someone's physical or mental health or wellbeing is at urgent or serious risk. This includes an urgent need for life sustaining food, water, clothing or shelter. All of your data protection rights may apply, except the right to object and the right to portability.
- Public task we have to collect or use your information to carry out a
  task laid down in law, which the law intends to be performed by an
  organisation such as ours. All of your data protection rights may
  apply, except the right to erasure and the right to portability.



Our lawful bases for collecting or using personal information for **recruitment purposes** are:

- Consent we have permission from you after we gave you all the relevant information. All of your data protection rights may apply, except the right to object. To be clear, you do have the right to withdraw your consent at any time.
- Contract we have to collect or use the information so we can enter into or carry out a contract with you. All of your data protection rights may apply except the right to object.
- Legal obligation we have to collect or use your information so we can comply with the law. All of your data protection rights may apply, except the right to erasure, the right to object and the right to data portability.
- Legitimate interests we're collecting or using your information because it benefits you, our organisation or someone else, without causing an undue risk of harm to anyone. All of your data protection rights may apply, except the right to portability. Our legitimate interests are:
  - o Assessing candidate skills, qualifications and suitability for roles Communicating with applicants throughout the recruitment process Managing applications for employment, volunteering or trustee roles conducting pre-employment checks including references, or background screening (as appropriate) Keeping records of applications and interview outcomes to manage future recruitment needs and demonstrating fair hiring practices. Demonstrating fairness, accountability and compliance with our charitable governance responsibilities This processing is necessary to help us attract and appoint suitable individuals who align with or organisations values and maintain the integrity and quality of our charitable work We ensure all recruitment data is handled in a way that respects applicants rights and is limited to what is necessary for this purposes.



For more information on our use of legitimate interests as a lawful basis you can contact us using the contact details set out above.

- Vital interests collecting or using the information is needed when someone's physical or mental health or wellbeing is at urgent or serious risk. This includes an urgent need for life sustaining food, water, clothing or shelter. All of your data protection rights may apply, except the right to object and the right to portability.
- Public task we have to collect or use your information to carry out a
  task laid down in law, which the law intends to be performed by an
  organisation such as ours. All of your data protection rights may
  apply, except the right to erasure and the right to portability.

Our lawful bases for collecting or using personal information for **dealing** with queries, complaints or claims are:

- Consent we have permission from you after we gave you all the relevant information. All of your data protection rights may apply, except the right to object. To be clear, you do have the right to withdraw your consent at any time.
- **Contract** we have to collect or use the information so we can enter into or carry out a contract with you. All of your data protection rights may apply except the right to object.
- **Legal obligation** we have to collect or use your information so we can comply with the law. All of your data protection rights may apply, except the right to erasure, the right to object and the right to data portability.
- **Legitimate interests** we're collecting or using your information because it benefits you, our organisation or someone else, without causing an undue risk of harm to anyone. All your data protection rights may apply, except the right to portability. Our legitimate interests are:
  - Investigating and resolving complaints fairly Responding to queries about our charitable services, operations recording or managing correspondence to monitor trends, improve service quality and demonstrate accountability. Handling legal claims



or disputes that may arise in our charitable work This processing is necessary to uphold our duty of care, maintain public interest, and continuously improve how we serve our communities and individuals. We ensure personal information is used to the extent required for purpose and is handled with strict confidentiality

For more information on our use of legitimate interests as a lawful basis you can contact us using the contact details set out above.

# Where we get personal information from

- Directly from you
- Regulatory authorities
- Family members or carers
- Other health and care providers
- Charities or voluntary sector organisations
- Publicly available sources
- Councils and other public sector organisations
- Previous employers
- Suppliers and service providers
- within the organisation

## How long we keep information

#### 5 years

For more information on how long we store your personal information or the criteria we use to determine this please contact us using the details provided above.



## How to complain

If you have any concerns about our use of your personal data, you can make a complaint to us using the contact details at the top of this privacy notice.

If you remain unhappy with how we've used your data after raising a complaint with us, you can also complain to the ICO.

The DUA 2025 now formalises a data subject's "right to complain" to a data controller. This means a charity's supporters, beneficiaries, and volunteers are required to raise their data protection concerns with the organisation first. The ICO will typically only consider a complaint after the individual has exhausted the organisation's internal process.

#### The ICO's address:

Information Commissioner's Office Wycliffe House Water Lane Wilmslow Cheshire SK9 5AF

Helpline number: 0303 123 1113

Website: https://www.ico.org.uk/make-a-complaint