

At Keychange Charity we take our data protection responsibilities seriously and only collect information needed to manage our business.

We hold your personal information safely and only keep it for as long as is necessary. As a result of the introduction of the General Data Protection Regulation (GDPR) in May 2018, we have changed our Privacy Notice and need to make you aware of these changes. The Notice is set out below and explains what personal information we collect, what we do with your personal information, who we might share it with and your rights under the legislation.

Keychange Charity's Customer Privacy Notice

All personal information provided by you will be under the control of Keychange Charity acting as Data Controller and will be processed in line with applicable UK data protection legislation including, but not limited to, the General Data Protection Regulation (EU) 2016/679 (GDPR) and the Data Protection Act 2018 (the DPA). Keychange Charity is registered with the Information Commissioner's Office (ICO) and our registration number is **Z7131777**

This Privacy Notice tells you about the sort of personal information we collect and how it will be used by us.

Who does this privacy notice apply to?

This notice applies to those applying for a place at a Keychange care home, housing community and other Keychange Charity service users.

What is personal information?

Personal information is information that alone or combined with other information may identify you. Under the GDPR personal data is defined as:

“any information relating to an identified or identifiable natural person ('data subject'); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person”.

We do not consider personal information to include information that has been anonymised so that it does not allow you to be identified

Why do we collect and store personal information?

Keychange Charity needs to collect, process and store personal information about you and other household members. We need this information to operate as a registered provider of housing and care to deliver services effectively to our customers.

How do we collect your personal information?

Personal information may be collected in different ways including:

- making or responding to an application for housing or care;
- dealing with the on-going management of your chosen service;
- communicating with you during face to face discussions, telephone conversations, e-mails, letters or by text;
- any relevant information we may gather during the provision of support or care services;
- any other organisations relevant to your application and ongoing service such as local authorities or previous landlords; or
- Keychange Charity customer satisfaction surveys.

What personal information do we collect?

Examples of the kind of information that we collect and hold about you include:

- your name, address and contact details
- your bank details
- your photograph
- next of kin and emergency contact details

Certain information is known under the GDPR as “special categories i.e. “sensitive personal data”. To provide you with the services you have chosen we may also need to collect sensitive personal data and this may be information about your religion and health.

Collecting this information may be necessary for the management and provision of housing, care and support. It also allows us to promote and maintain the equality of any person holding different religious or ethnic beliefs.

If we collect any other sensitive information we will ask for your consent.

What will we do with your personal information?

We will use the information that you provide for a number of different reasons and upon different legal bases depending on the reason for which we have collected or obtained or obtained your personal information. We do this in order to manage all aspects of our contracted service to you. The main reasons we process your information are to:

- assess your needs and suitability for the services we provide now and in the future – this is necessary for the performance of, or to take steps at your request prior to entering into, a contract with you;
- undertake housing and care management – this is necessary for the performance of our contract with you;
- monitor and meet your housing, care and support requirements – this is necessary for the performance of our contract with you;

- to collect any payments, benefits or grants – this is necessary for the performance of our contract with you and in pursuance of Keychange Charity's legitimate interests;
- to monitor service quality and performance - this is necessary in order to fulfil our legitimate interest in improving the service that we offer to you and to comply with our legal obligations
- to carry out research such as surveys to help us improve our services to you – this is necessary in order to fulfil our legitimate interest in improving the service that we offer to you;
- to supply information to organisations that audit and regulate us – this is necessary under our legal obligations; and
- to send you details of our services – this is done in order to fulfil our legitimate interest in providing you with this information. Whenever we contact you for marketing purposes we will give you the opportunity to opt-out of receiving further marketing materials.

Sharing your information with others

There may be times when we need to share information about you with other organisations. These other organisations will include:

- organisations that will enable the provision of any housing or care obligations we have towards you, and who provide a service to us such as contractors to undertake repairs;
- local authorities who need your personal information to monitor the quality of our service to you and our obligations to them in relation to the receipt of benefits or grants;
- our regulators who require your personal information to assure them that the services we provide to you comply with essential standards of safety and quality;
- a third party by whom Keychange Charity, or substantially all of its assets, are acquired, in which case personal data held by us about our clients will be one of the transferred assets; or
- those with which we are required or permitted to by law.

The information we share with others will be the minimum necessary to enable them to carry out their task. Sensitive personal information will only be made available to those dealing with your housing, care and support.

We will not transfer your personal information outside of the European Economic Area. We will ensure that anyone we pass personal information to agrees to treat it securely and confidentially and to use or process it solely for the reasons it is provided.

How long is my personal data kept for?

We will only keep your personal data for as long as is necessary for the required service to be provided to you and we will securely dispose of it after that time. Keychange Charity is required to retain certain information in accordance with the law and may also be governed by specific business and sector

requirements. Where you have applied to go on a waiting list for an Keychange Charity service we will contact you once a year to confirm that you wish to remain on this waiting list.

Where will my personal information be stored?

Your information will be stored securely within Keychange Charity's own IT systems.

Your rights as a data subject

At any point while we are in possession of or processing your personal data, you, the data subject, have the following rights:

- Right of access – you have the right to request a copy of the information that we hold about you.
- Right of rectification – you have a right to correct data that we hold about you that is inaccurate or incomplete.
- Right to be forgotten – in certain circumstances you can ask for the data we hold about you to be erased from our records.
- Right to restriction of processing – where certain conditions apply you have a right to restrict the processing.
- Right of portability – you have the right to have the data we hold about you transferred to another organisation.
- Right to object – you have the right to object to certain types of processing such as direct marketing.
- Right to object to automated processing, including profiling – you also have the right to be subject to the legal effects of automated processing or profiling.
- Right to judicial review: in the event that Keychange Charity refuses your request under rights of access, we will provide you with a reason as to why. You have the right to complain as outlined in clause below.

Can I find out the personal data that the Keychange Charity holds about me?

Keychange Charity at your request, can confirm what information we hold about you and how it is processed. If Keychange Charity does hold personal data about you, you can request the following information:

- The purpose and legal basis for processing;
- If the processing is based on the legitimate interests of Keychange Charity or a third party, information about those interests;
- The categories of personal data collected, stored and processed;
- The recipient(s) or categories of recipients that the data is/will be disclosed to;
- If we intend to transfer the personal data to a third party or international organisation, information about how we ensure this is done securely;
- How long the data will be stored;
- Information about your right to withdraw consent at any time;
- Whether the provision of personal data is a statutory or contractual requirement, or a requirement necessary to enter into a contract, as well as whether you are obliged to provide the personal data and the possible consequences of failing to provide such data;

- The source of personal data if it wasn't collected directly from you; and
- Any details regarding automated decision making, such as profiling, and any meaningful information about the logic involved, as well as the significance and expected consequences of such processing.

In the event that we need to establish your identity before responding to a request to exercise your rights we may request that you provide us with ID, for example passport, driving licence, birth certificate, utility bill (from last 3 months).

If you would like to exercise any of your rights or request a copy of some or all of your personal information, please either complete a Data Subject Access Request Form, or contact us by using the details below. No charge will be made for this service.

We want to make sure our personal information is accurate and up to date. By using the contact methods below or the Contact us page of the Website, you may request that we correct or remove information you feel is inaccurate.

Complaints

In the event that you wish to make a complaint about how your personal data is being processed by Keychange Charity or any of our third parties, or how your complaint has been handled, please contact Keychange Charity's Data Protection Officer on the details provided below.

You also have the right to complain to the ICO about how we have processed your personal data. The ICO can be contacted at Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF, by telephone on 0303 123 1113 or through the website www.ico.org.uk.

Marketing

Where you have expressed an interest through submitting an enquiry, requesting information or selecting your email preferences within your profile, we may wish to contact you for marketing purposes to promote other related Keychange Charity services to you or to ask you to take part in our survey. This could be by post, telephone, email or text message. We will give you the opportunity to opt out of receiving such marketing materials from us when we collect your information and each time we contact you we will check that you are happy to continue to receive further direct marketing. You can opt-out of receiving marketing material from us at any time by contacting us using the details shown below. We will not pass your personal details on to any other organisation for the purposes of marketing.

We would like to send you details about our own products and services which may be of interest to you by either post, email and text message.

If you wish to receive this information please contact us

By email at: info@keychange.org.uk

In writing to: Keychange Charity
5 St George's Mews
43 Westminster Bridge Road
London
SE1 7JB

Or call us on 0207 633 0533

How to stop marketing

If you no longer wish us to contact you, please let us know by emailing info@keychange.org.uk or by using any of the other contact methods set out below.

You can stop us from contacting you for marketing purposes at any time. Please note we will not pass your personal details on to any other organisation for the purposes of marketing.

How to contact us

You can contact us in the following ways to discuss any aspect of this notice or about the information we hold about you:

- Writing to the: Data Protection Officer
Keychange Charity
5 St George's Mews
43 Westminster Bridge Road
London
SE1 7JB
- Email us at info@keychange.org.uk
- Using the Contact Us section on our websites
- Telephoning 0207 633 0533.

This privacy notice may change from time to time. Please check this page on the website on a regular basis to read our latest version.

Privacy Notice Date: July 2018

Privacy Notice Review Date: July 2019