

PRIVACY NOTICE

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

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Contact details

Post

The Blackthorn Trust, St. Andrews Road, , MAIDSTONE, Kent, ME16 9AN

Telephone

01622 828382

Email

info@blackthorn.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
- Religious or philosophical beliefs
- Genetic information
- Health information
- Sex life information
- Sexual orientation information

We collect or use the following information to **receive donations or funding and organise fundraising activities**:

- Names and contact details
- Addresses
- Payment or banking details
- Donation history
- Health information
- Taxpayer information (for Gift Aid purposes)
- Gifts in wills
- Visitors to our stores and website

We also collect or use the following special category information to **receive donations or funding and organise fundraising activities**. This information is subject to additional protection due to its sensitive nature:

- Racial or ethnic origin
- Genetic information
- Health information

We collect or use the following personal information for **service updates or marketing purposes**:

- Names and contact details
- Addresses
- Marketing preferences
- Recorded images, such as photos or videos
- Call recordings
- Purchase history
- Donation history
- IP addresses
- Website and app user journey information
- Records of consent, where appropriate

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
- Criminal offence data

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:

- Genetic information
- Health information

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)
- Security clearance details (eg basic checks and higher security clearance)

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
- Witness statements and contact details
- Relevant information from previous investigations
- 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:

- Genetic information
- Health information

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 [lawful bases](#) 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:

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

Our lawful bases for collecting or using personal information to **receive donations or funding and organise fundraising activities** 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.

- 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:

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

Our lawful bases for collecting or using personal information for **service updates or marketing 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.
- 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:

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

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.
- 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.

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.
- 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:

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

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.
- **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:

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
- Social services
- Charities or voluntary sector organisations
- Schools, colleges, universities or other education organisations
- CCTV footage or other recordings
- Insurance companies
- Previous employers
- Suppliers and service providers
- private health companies care homes

How long we keep information

Data Type	Retention	Disposal
Therapy notes	7 years	Secure deletion / shredding
Service User records	7 years	Secure deletion / shredding
Safeguarding	75 years	Secure archive
HR files	6 years	Secure deletion
Volunteer records	3 years	Secure deletion
Donor data	6 years	Secure deletion
CCTV	30 days	Auto-delete

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.

Who we share information with

Data processors

Aerial Direct Limited

This data processor does the following activities for us: They manage our phone systems including call recordings.

King & Taylor

This data processor does the following activities for us: They audit our accounts.

Lamplight Database Systems Limited

This data processor does the following activities for us: They store our CRM records.

Mindcare AS

This data processor does the following activities for us: They manage our private therapy administration including payments.

Octopus-IT

This data processor does the following activities for us: They manage our IT systems including email hosting.

People Circle

This data processor does the following activities for us: They provide HR consultancy services.

UHY Hacker Young

This data processor does the following activities for us: They manage our payroll.

WP Maintain

This data processor does the following activities for us: They host our website.

Others we share personal information with

- Other health providers (e.g. GPs and consultants)
- Insurance companies, brokers and other intermediaries
- Charities and voluntary organisations
- Care providers
- Organisations we need to share information with for safeguarding reasons
- Emergency services
- Professional advisors
- Legal bodies or authorities
- Local authorities or councils
- Relevant regulatory authorities
- External auditors or inspectors
- Organisations we're legally obliged to share personal information with
- Publicly on our website, social media or other marketing and information media
- Current employers
- Suppliers and service providers

Sharing information outside the UK

Where necessary, our data processors may share personal information outside of the UK. When doing so, they comply with the UK GDPR, making sure appropriate safeguards are in place.

For further information or to obtain a copy of the appropriate safeguard for any of the transfers below, please contact us using the contact information provided above.

Organisation name: AWS

Category of recipient: IT processing

Country the personal information is sent to: Germany

How the transfer complies with UK data protection law: UK Adequacy Regulations

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 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>

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