# **BOOTH CENTRE PRIVACY STATEMENT**

This Privacy Statement is set out to explain our practices regarding how and why we collect, record, process and store **personal data**. Protecting your privacy is really important to us and we are committed to ensuring that your personal data is processed fairly and lawfully in accordance with the *General Data Protection Regulations* (2018). All individuals whose responsibilities include the processing of any personal data relating to an identified or identifiable person on behalf of Booth Centre are expected to protect that data by adherence to our Privacy Policy. The Booth Centre is a data controller as defined by the *Data Protection Act* (1998) and the *General Data Protection Regulations* (2018).

# What is personal data?

Personal data is information which relates to a living person and which allows that person to be identified, for example by name, date of birth, address, telephone number. Data capture is the term used to refer to the collection of your personal data.

Sensitive personal data is considered to be information which relates to racial or ethnic origin, political opinions, religious beliefs, trade union membership, physical or mental health matters, sexual orientation, alleged or real offences and proceeds from offences.

# How, why and when we collect your personal data:

- We will collect personal data from you when you access the centre for help & support or when you donate, register to receive communications, participate in an event or apply to work or volunteer at the Booth Centre.
- This data is collected in order to give you the best service possible, to keep you informed, acknowledge your support or as part of our recruitment process.
- We will be collecting your personal data under the two following legal bases:
  - **Legitimate interest**: the processing is necessary for your legitimate interests or the legitimate interests of a third party unless there is a good reason to protect the individual's personal data which overrides those legitimate interests. This will typically apply to people accessing the centre for support & help.
  - Consent: the individual has given clear consent for you to process their personal data for a specific purpose. This will typically apply to communications, donors and events. It may still be necessary to ask you to sign a consent to disclosure form if we need to contact other services for information about you to help secure other services for you.

## Permission:

We will always ask for your permission to record, process and store your personal data, and you will be informed at the first point of data capture why it is needed, who it will be shared with and how long it will be kept. You have the right to refuse, opt out, review and request the removal of your data at any time, and will be supported by the Booth Centre in any of these matters should you choose to do so.

#### How we may process or share your personal data:

### Information relating to people who access the Centre for help or support

If you access the Booth Centre for support we will store your personal data with your permission, on our secure customer relationship management (CRM) system, which is called In Form (managed externally by Homeless Link for technical support). All data recorded on this database is accessible by the Booth Centre team only. Added to this, we also use Manchester and Salford Gateway database to access accommodation and services for individuals. There is an Information Sharing Agreement in place, with Manchester City Council managing this database. Further information regarding the MAS Gateway database can be found at <u>www.manchester.gov.uk</u>. We also have historical records of some individuals on the GMThink database, though we no longer add records to this database. Multiple other independent organisations use GMThink. Though we do not share day to day information, some of your personal data may be viewable by other participating organisatons. GMThink is managed by Shelter and the GMThink privacy statement can be found <u>here</u>. In exceptional circumstances, we may be required by law to disclose your personal data to the Police; this could include disclosing personal data as part of a criminal investigation or for safeguarding purposes. In all instances we will ensure, where possible, that no other option is available to us and that, where possible, you are informed beforehand.

#### Information relating to people who are not accessing the Centre for help or support

We will process your personal data, with your consent and according to your preferences, as part of our communications and fundraising activities. You can change your preferences at any time by contacting us at the Booth Centre. We will never sell or share your details with third parties and all of our correspondence will give you the option of opting-out of future contact. This list is not exhaustive, but be assured, we will keep you fully informed through transparent processes and we will seek your consent whenever required, before using your personal data.

#### How we will store your personal data:

We are committed to protecting your personal data by storing it on secure customer relationship management (CRM) systems. We may also use both electronic and paper systems for recording, processing and storing some of your data. Where paper is used, personal data will only be kept when necessary in secure, locked locations in the centre and disposed of when no longer needed.

#### Your right to access:

You have the right to request the removal of any of your personal data that we do not have a legal requirement to keep. You have the right to know what information is held about you at any time. You have the right to request access to your personal information. We will endeavour to respond to your requests in a timely manner, taking not more than 30 working days. In the case of your personal data being stored on a shared access CRM system, this process will be managed by the right to access policy of the data controller.

We, the Booth Centre, have the right to retain your personal data in the event that removing it would interfere with a criminal investigation, or if it was included in the personal data of another and was a matter of personal safety. In such extraordinary circumstances as these, you would be kept informed of all / any decisions.

If you are unhappy with any matters relating to the handling of your personal data by the Booth Centre, we would encourage you to follow our Complaints Procedure or to contact the managing body for GDPR directly (Information Commissioners' Office) on 0303 123 1113 or online @ www.ico.org.uk