

Client Privacy Notice

Why do I need to read this?

If you interact with any of our projects and/or services, there will be some personal information which we need to collect in order to offer you the best possible support. As each service requires different information you will need to read the following information contained in this Privacy Notice, which will explain:

- What information we need to collect
- The legal reason we collect this and why we need it
- How long we will hold onto your data after you've left the service
- How we may share your data
- How you can exercise your data protection rights.

Our legal bases for collecting your information

Depending on the service we will collect your information under one or more of the following legal bases:

- Consent – we will use this where we can offer you a choice as to whether or not we collect, store, share or otherwise process your information. This will be made clear to you, and will not be done unless we have your consent.
- (Substantial) Public Interest – where we are working to assist with public law we will collect your information under public interest. We will be clear about why we have to collect this information, how it will be used, who you can expect it to be shared with and why.
- Contract – in some cases we need to collect information in order to fulfil a contract, this will generally be when you have a tenancy or licence agreement with us.
- Legitimate Interest – we may collect other information about you which we believe will assist you when you are with us. This will be used to ensure you are receiving tailored and specific support around your needs.

If you have any objections to these types of processing, you can contact the Data Protection Officer using the details below.

Sharing your personal information

We may need to share some of your information, and we will always take appropriate precautions before doing so. If there are parties we share with regularly, their details will also be provided in this Privacy Notice, along with a reason for doing so. Where we do not **need** to share information, we will always ask for your consent. We do this to respect your right to have a control over your data, and where it is going.

Questions about your data

If you have any questions please speak to your service manager or you can contact our Data Protection Officer using the details below.

Privacy@impakt.org.uk

IMPAKT Housing & Support Privacy Notice

IMPAKT Housing & Support (“we,” “us,” “our,” or the “Organisation”) is committed to protecting the privacy of individuals who visit the Organisation’s websites (“Visitors”) and individuals who register to use the Services as defined below (“Clients”). This Privacy Notice describes Organisation’s privacy practices in relation to the use of the applications and services offered by IMPAKT Housing & Support (collectively, the “Services”), as well as individuals’ choices regarding use, access and correction of personal data.

We are listed on the Information Commissioner’s Office (“ICO”) register of data controllers with registration number Z2740631.

IMPAKT Housing & Support Privacy Notice

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1. Contact information

For the purpose of applicable data protection legislation, the data controller of your personal data is IMPAKT Housing & Support located in Bedfordshire, UK.

Questions regarding this Privacy Notice or the information practices of the Organisation's websites and Services should be directed to the IMPAKT Housing & Support privacy team by emailing us at Privacy@impakt.org.uk or by mailing us at the address below:

IMPAKT Housing & Support
Data Privacy Team
43 Bromham Road
Bedford
MK40 2AA

2. Scope of Data Privacy

This Privacy Notice covers the information practices, including how the Organisation collects, uses, shares and secures the personal information you provide, of application and services that link to this Privacy Notice (collectively referred to as “the Organisation’s Applications”).

Sharing personal information on the IMPAKT Housing & Support website is entirely voluntary and can only be the result of registration. When you use IMPAKT Housing & Support’s application/website, we collect and store your personal information as provided by you. We may collect and store the following personal information- name, address, contact numbers, email address, physical contact information and photographs.

IMPAKT Housing & Support provides a website with opportunities for individuals and organizations to engage and communicate with IMPAKT Housing & Support. Sharing personal information on Impakt.org.uk can only be the result of visiting pages, registration, or an explicit request to communicate with IMPAKT Housing & Support as an organisation.

IMPAKT Housing & Support applications and website may contain links to other websites. The information practices or the content of such other websites is governed by the privacy notices of such other websites. We encourage you to review the privacy notices of other websites to understand their information practices.

3. Consent

IMPAKT Housing & Support will only collect personal data appropriate to the identified purpose for processing. During applications for IMPAKT Housing & Support services, individuals will be asked to confirm consent at each stage where new personal data is collected.

By agreeing to this privacy notice, you expressly consent to the following:

- IMPAKT Housing & Support processing your personal or sensitive data in relation to your application, on-going accommodation, other services or employment.
- IMPAKT Housing & Support processing your personal or sensitive data in relation to your / your child's attendance at IMPAKT Young People courses / events.
- IMPAKT Housing & Support sharing your personal data with relevant persons working for service providers who assist us to provide our services.
- A privacy notice is available on the IMPAKT Housing & Support website to cover the use of the website and newsletter features.

If you later want to change your consent, contact IMPAKT Housing & Support at Privacy@ymcabedfordshire.org.

3.1 Consent of Children

If the personal information collected relates to somebody under the age of 16, this privacy notice is aimed at their parent or guardian with parental responsibility, who is expected to make a decision on this consent on their behalf.

4. Types of data collected directly from User (or Responsible Adult / Guardian)

- IMPAKT Housing - Personal identification data (inc. photograph), historical data (employment, criminal, address), support & wellbeing needs.
- IMPAKT Domestic Abuse Refuges - Personal identification data (inc. photograph), dependent(s) data, historical data (employment, criminal, address), support & wellbeing needs.
- IMPAKT Young People - Children: Personal identification data (inc. photograph), historical data (education, criminal, family history), support & medical needs.
- IMPAKT Young People - Parents: YMCA FUN4YP - Personal identification data (inc. family status), historical data (employment, criminal, health).

5. Types of data collected indirectly from User

IMPAKT Housing and IMPAKT Domestic Abuse Refuges:

- Police National Computer (PNC) checks, 2 references, housing benefit / council tax support payment information, feedback from school/college/social worker/other professionals involved, information from other residents (e.g. reporting an incident, conversation etc.), CCTV (video footage)

IMPAKT young People:

- Tutors' behavioural notes, school feedback, other professional feedback (social worker etc.), information from other Fun4YP young people (e.g. reporting an incident, conversation etc.)

6. Cookie Policy

IMPAKT Housing & Support uses cookies to make interactions with the Organisation's websites easy and meaningful. When you visit one of the Organisation's websites, Organisation's servers send a cookie to your computer. Standing alone, cookies do not personally identify you; they merely recognize your web browser. Unless you choose to identify yourself to IMPAKT Housing & Support, either by responding to a promotional offer, opening an account, or filling out a web form, you remain anonymous to the Organisation.

We use traffic log cookies to identify which pages are being used. This helps us analyse data about web page traffic and improve our website in order to tailor it to customer needs. We only use this information for statistical analysis purposes and then the data is removed from the system.

Overall, cookies help us provide you with a better website, by enabling us to monitor which pages you find useful and which you do not. A cookie in no way gives us access to your computer or any information about you, other than the data you choose to share with us.

You can choose to accept or decline cookies. Most web browsers automatically accept cookies, but you can usually modify your browser setting to decline cookies if you prefer. This may prevent you from taking full advantage of the website.

By using this website you agree in the use of cookies on this site.

IMPAKT Housing & Support uses cookies that are either persistent. Persistent cookies remain on your computer after you close your browser or turn off your computer.

7. Data privacy management

- IMPAKT Housing & Support will only process your personal data in accordance with applicable data protection and privacy laws. We need certain personal data in order to provide you with access to our website and services.
- This consent provides us with the legal basis we require under applicable law to process your data.
- You maintain the right to withdraw such consent at any time. If you do not agree to our use of your personal data in line with this Policy, please do not use our website, application or provide us personal information either over the phone, in email, through web forms or in any other way.

8. Data Sharing

a. Service Providers

IMPAKT Housing & Support may share Data about our Clients with the Organisation's contracted service providers so that these service providers can provide services on our behalf. These service providers are authorised to use your personal information only as necessary to provide the requested services to us. Without limiting the foregoing, we may also share Data about Clients with the Organisation's service providers to ensure the quality of information

provided, and with third-party social networking and media websites, such as Facebook, for marketing and advertising on those websites. Unless described in this Privacy Notice, IMPAKT Housing & Support does not share, sell, rent, or trade any information with third parties for their promotional purposes.

IMPAKT Housing & Support stores your information for sales and marketing purposes in the following cloud based software solutions:

- Mail Chimp (US)

IMPAKT Housing & Support stores your personal information for use in general enquiries & job applications:

- IMPAKT Housing & Support Mail Servers (UK)
- IMPAKT Housing & Support File Servers (UK)

b. Third Parties

We may disclose your personal information to any of the following third parties without your prior consent.

Social Services Safeguarding Teams: Personal Information relating to Safeguarding situation

IMPAKT Housing & Support maintains contracts with these third parties restricting their access, use and disclosure of personal data in compliance with our data protection obligations, and IMPAKT Housing & Support may be liable if they fail to meet those obligations and we are responsible for the event giving rise to damage.

IMPAKT Housing & Support Partners:

- *Centum: Basic client information for overnight project security*
- *Grand Union Housing Association: Anonymous statistics on project use & client profiles*
- *Central Bedfordshire Council: Anonymous statistics*
- *Bedford Borough Council: Anonymous statistics*
- *Luton Borough Council: Anonymous statistics*
- *Big Lottery: Anonymous statistics*
- *Children in Need: Anonymous statistics*
- *Wixamtree: Anonymous statistics*
- *Panacea Society: Anonymous statistics*
- *Bedford Rotary Club: Anonymous statistics*
- *BPHA: Anonymous statistics*
- *Harpur Trust: Anonymous statistics*
- *PNE: Anonymous statistics*
- *BLCF: Anonymous statistics*
- *WRAP: Anonymous statistics*

c. IMPAKT Housing & Support as Data Controller

IMPAKT Housing & Support is listed as the Data Controller for personal data collected in connection with IMPAKT Housing & Support services.

IMPAKT Housing & Support is joint Data Controller with Grand Union Housing Association for Personal Data collected in connection with IMPAKT Domestic Abuse Refuge services.

d. Compelled Disclosure

IMPAKT Housing & Support reserves the right to use or disclose information provided if required by law or if the Organisation reasonably believes that use or disclosure is necessary to protect the Organisation's rights and/or to comply with a judicial proceeding, court order, or legal process. In addition to the above, the following are bodies we might expect to require information from IMPAKT Housing & Support:

- Police
- Social Services
- Early Help / MASH teams
- DWP
- HMRC
- IMPAKT Housing & Support Insurers

9. International transfer of information collected

For IMPAKT Housing & Support Client Data:

There is currently no third party supplier data transfer outside of the UK.

We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this notice.

10. Communications preferences, opt out and unsubscribe information

IMPAKT Housing & Support offers Visitors, Clients, and Attendees who provide contact information a means to choose how the Organisation uses the information provided. You may manage your receipt of marketing and non-transactional communications by clicking on the "unsubscribe" link located on the bottom of the Organisation's marketing emails. Additionally, you may unsubscribe by contacting us using the information in the "Contacting Us" section below.

11. Data Retention

We will only retain your personal data for the period you are accessing our service(s) plus whichever is the longer of;

IMPAKT Housing & Support Clients:

- We will keep your data for a period in-line with the National Housing Federation guidelines, which you can find here. This usually means a retention period of 6 years after you leave our service unless you were under 18 years of age when you accessed our service, in which case the Children's Act 1989 will apply and we will retain some data until your 26th birthday.
- In the case of anonymised statistical data for as long as that data is useful to the organisation.
- In the cases of marketing materials (such as case studies, photographs etc) for as long as you have allowed us consent, or until you withdraw that consent

We will only retain the data which is relevant to the reason which we are citing for retaining as above.

12. Automated Decision Making

We do not use your personal data for the purposes of automated decision-making. However, we may do so in order to fulfil obligations imposed by law, in which case we will inform you of any such processing and provide you with an opportunity to object.

13. Rights and Choices to your Personal Data

Opt-out (Right to Restrict Processing)

You may contact us anytime to opt-out of: (i) direct marketing communications; or (ii) any new processing of your personal data that we may carry out beyond the original purpose. Please note that your use of some of the IMPAKT Housing & Support website and services may be ineffective upon opt-out.

Access (Right to be informed, Right of Access)

You may access the data we hold about you at any time via your account by contacting us directly at Privacy@ymcabedfordshire.org.

Amend (Right to Rectification)

You can also contact us to update or correct any inaccuracies in your personal data (applicable for website users).

Move (Right to Data Portability)

Your data is portable – i.e. you to have the flexibility to move your data to other service providers as you wish.

Erase and forget (Right to Erasure)

In certain situations, for example when the data we hold about you is no longer relevant or is incorrect, you can request that we erase your data.

14. Changes to this Privacy Notice

IMPAKT Housing & Support may update this Privacy Notice from time to time. If we make any material changes we will notify you by providing a copy (paper or email) of the revised Privacy Notice. This helps you to always be aware of what information we collect, how we use it and under what circumstances, if any, it is disclosed. Any additional provision of personal data during your continued use of the IMPAKT Housing & Support Service(s) will be subject to the terms of the then-current Privacy Notice.