

# **Privacy Notice**

### Who we are

Our website address is: http://www.westsomersetadvice.org.uk. West Somerset Advice is an independent charity registration number 1126930 and a company limited by guarantee registration number 06693841 and the Trustees of the charity ensure that the organisation complies with Charity Commission guidelines & Company Law in the way it operates and manages its services.

# What personal data we collect and why we collect it

We use the information that you supply that we understand your circumstances fully. This ensures that we give advice to you based on your circumstances – this advice is only for you and may not apply if we have not recorded your details correctly – please check we have the recorded the right information. Please ask family and friends to contact us as the advice we would give to them may be different. We do not knowingly share your information with a third party with your explicit consent. You will be asked to sign a form to share data with another agency.

From time to time we are asked to identify people who are happy to talk to foundations and grant making trusts who fund our work. We may contact you to ask your permission to give your name, we may use the outcome of your case and change your name without your consent.

We will only contact you to progress your case or to find out if the advice we gave was helpful.

#### Comments

When visitors leave comments on the site we collect the data shown in the comments form, and also the visitor's IP address and browser user agent string to help spam detection. An anonymized string created from your email address (also called a hash) may be provided to the Gravatar service to see if you are using it. The Gravatar service privacy policy is available here: https://automattic.com/privacy/. After approval of your comment, your profile picture is visible to the public in the context of your comment.

#### Media

If you upload images to the website, you should avoid uploading images with embedded location data (EXIF GPS) included. Visitors to the website can download and extract any location data from images on the website.

#### **Contact forms**

We temporarily store your data in webforms on Jotform EU, this data is encrypted and when downloaded is held on our private network (see details below)

#### Cookies

If you leave a comment on our site you may opt-in to saving your name, email address and website in cookies. These are for your convenience so that you do not have to fill in your details again when you leave another comment. These cookies will last for one year.

If you have an account and you log in to this site, we will set a temporary cookie to determine if your browser accepts cookies. This cookie contains no personal data and is discarded when you close your browser.

When you log in, we will also set up several cookies to save your login information and your screen display choices. Login cookies last for two days, and screen options cookies last for a year. If you select "Remember Me", your login will persist for two weeks. If you log out of your account, the login cookies will be removed.

If you edit or publish an article, an additional cookie will be saved in your browser. This cookie includes no personal data and simply indicates the post ID of the article you just edited. It expires after 1 day.

#### Embedded content from other websites

Articles on this site may include embedded content (e.g. videos, images, articles, etc.). Embedded content from other websites behaves in the exact same way as if the visitor has visited the other website.

These websites may collect data about you, use cookies, embed additional third-party tracking, and monitor your interaction with that embedded content, including tracing your interaction with the embedded content if you have an account and are logged in to that website.

#### Analytics

Who we share your data with

West Somerset Advice collect and use your personal information to help solve your problems, improve our services and tackle wider issues in society that affect people's lives. We only ask for the information we need. We always let you decide what you're comfortable telling us, explain why we need it and treat it as confidential.

When we record and use your personal information we: only access it when we have a good reason; only share what is necessary and relevant; don't sell it to anyone.

At times we might use or share your information without your permission. If we do, we'll always make sure there's a legal basis for it. This could include situations where we have to use or share your information:

- to comply with the law for example, if a court orders us to share information. This is called 'legal obligation';
- to protect someone's life for example, sharing information with a paramedic if a client was unwell at our office. This is called 'vital interests';
- to carry out our legitimate aims and goals as a charity for example, to create statistics for our national research. This is called 'legitimate interests'.
- for us to carry out a task where we're meeting the aims of a public body in the public interest – for example, delivering a government or local authority service. This is called 'public task'.
- to carry out a contract we have with you for example, if you're an employee we might need to store your bank details so we can pay you. This is called 'contract'.
- details so we can pay you. This is called 'contract'.
  to defend our legal rights for example, sharing information with our legal advisors if there was a complaint that we gave the wrong advice.

We handle and store your personal information in line with the law – including the General Data Protection Regulation and the Data Protection Act 2018.

Citizens Advice West Somerset is an operating names of West Somerset Advice Bureau. Charity registration number 1126930. Company limited by guarantee. Registered number 06693841 England. Authorised and regulated by the Financial Conduct Authority FRN: 628959. Registered office: Market House Lane, Minehead, Somerset TA24 5NW



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## How long we retain your data

The advice service is audited and the details of your case will be retained for 6 years (Limitation Act 1980). This is to protect us both against any breaches in the law. After 6 years has elapsed any paper held is sent to secure shredding and any electronic items are archived within our online case management system. Any electronic data held on our private server is deleted and any any backup is over written every week.

If you leave a comment, the comment and its metadata are retained indefinitely. This is so we can recognize and approve any follow-up comments automatically instead of holding them in a moderation queue.

#### What rights you have over your data

Your file belongs to you and you have a right to see your file at any time, we will not charge you for any copies of information held in our office.

If you have left comments on this site, you can request to receive an exported file of the personal data we hold about you, including any data you have provided to us. You can also request that we erase any personal data we hold about you. This does not include any data we are obliged to keep for administrative, legal, or security purposes.

You can contact us to:

- find out what personal information we hold about you;
- correct your information if it's wrong, out of date or incomplete;
- request we delete your personal information, we are required to keep the advice we have given you but this will be held anonymously.
- ask us to limit what we do with your data for example, ask us not to share it if you haven't asked us already;
- ask us to give you a copy of the data we hold in a format you can use to transfer it to another service;
- ask us stop using your information
- Who's responsible for looking after your personal information
- Where we send your data
- We will ask for your explicit consent before we share your information with other agencies and we will only share your information where it is necessary to do so.

We share information in order to progress your advice issues in a number of ways. The agencies that we share your information with will vary depending on your circumstances and the services we are providing to you. The agencies that we may include are as follows:

Money advice and debt casework – your creditors, your housing provider, your energy suppliers, DWP, Sedgemoor District Council, Somerset County Council, Wessex Water, HM Courts & Tribunals Service.

Welfare benefits advice and casework – DWP, Jobcentre, HM Courts & Tribunals Service, your GP or relevant health worker. Referrals – we assist you by making a referral to a foodbank, the Local Assistance Scheme or another specialist support agency.

# **Contact information**

If you have any questions about how your information is collected or used, you can contact our office. Please ask to speak to the manager or the supervisor.

Telephone: 0800 802 1808 open Monday, Wednesday and Thursday 10am to 4pm and Friday 10am-3pm

Email: Advice@citizensadvicewestsomerset.org.uk

# Additional information

#### How we protect your data

We hold paper data and on electronic data in the systems within our offices.

Advice UK operate a case management system called AdvicePro and Casebook to keep your personal information safe. This means they're a 'joint data controller' for your personal information that's stored on a secure server inside the EU. We store your information electronically in 'AdvicePro' this is held securely behind a users personal password. We also store electronic information on our private server which is on a private computer network. We hold data on a backup disk behind a password., and on our outlook email based on our private network for those clients who contacted by email.

We may store paper information in locked filing cabinets at our registered office.

If we visit you at home or at an outreach or there may be other reasons why paper information is used outside of the office. All data in transit is kept in a secure brief case until it can be return it to the office. If we scan data on a mobile phone using an app it is downloaded to our computer on return to the office and deleted from the phone.

We ask you for consent to leave messages and write to you at home. Our telephone system does not leave a caller number. You can opt out of communication with us and we will wait for you to contact us.

# What data breach procedures we have in place

CJ Systems manage our information and equipment. We use a secure ant-virus 'webroot' and are alerted to any electronic problems and data breaches by our contractors.

# What third parties we receive data from

Other agencies contact us to alert us that you may need help. They make book an appointment on your behalf or give us information to contact you. The agency concerned is responsible for gaining your consent to pass this information to us. We will not leave a message on your telephone without explicit consent to do so.

# What profiling we do with user data

We use the data – without your personal details to report statistics to our funders and to inform decision makers about trends and problems in our area.

#### Industry regulatory disclosure requirements

We are regulated by the Financial Conduct Authority FRN 628959. You can find out how to complain about money advice on their website

You have a right to complain to the information commissioner if you believe we have not handled your data correctly. Our reference is Z533303X. You can <u>find out more about your</u> <u>data rights on the Information Commissioner's website</u>.

The data controller is the manager Ian Atkinson