



Privacy Notice

1. Introduction

This privacy notice provides you with details of how we collect and process your personal data through your use of our services and activities, in accordance with the General Data Protection Regulations (GDPR).

Dial West Cheshire is the data controller (referred to as “we”, “us” or “our” in this privacy notice) and we are responsible for your personal data.

Our Contact Details:

Full name of legal entity: Dial West Cheshire
Postal address: DIAL House, Hamilton Place, Chester, CH1 2BH
Telephone number: 01244 345655
Email address: contactus@dialwestcheshire.org.uk
Website: www.dialwestcheshire.org.uk

We are a charity providing a range of services to enable disabled people and older people to live sustained, independent lives. We undertake to keep your data safe and secure. We do not sell data to third party organisations and we will not pass on your data to anyone else without your permission.

It is very important that the information we hold about you is accurate and up to date. Please let us know in writing or by email if at any time your personal information changes.

2. What Data do we Collect about You

Personal data means any information capable of identifying an individual. It does not include anonymised data. We may process certain types of personal data about you as follows:

- **Identity Data** - may include your first name, last name, title and gender.
- **Contact Data** - may include your billing address, delivery address, email and telephone numbers.
- **Sensitive Data** - may include details about your race or ethnicity, marital status, religious or philosophical beliefs, sexual orientation, information about your health and disabilities and information about any criminal offences and convictions.

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- **Financial Data** - may include your income, outgoings and bank account details.
- **Transaction Data** - may include details about payments between us and other details of purchases made by you.
- **Technical Data** - may include your login data, internet protocol addresses, browser type and version, browser, plug-in types and versions, time zone setting and location, operating system and platform and other technology on the devices you use to access our website.
- **Usage Data** - may include information about how you use our website, products and services.

3. How we Collect your Personal Data

We collect data about you through a variety of different methods including:

- Direct interactions: You may provide data by communicating with us by telephone, email, post, face-to-face or otherwise, including when you:
 - use or enquire about our services or products;
 - give us feedback.

4. How we Use your Personal Data

We will only use your personal data when legally permitted. Article 6 of the GDPR sets out the six lawful bases for processing data:

Consent
 Contract
 Legal obligation
 Vital interests
 Public task
 Legitimate interests.

4.1 Our most common uses of your personal data are:

- Where we need to perform the *contract* between us
- Where it is necessary for our *legitimate interests* (or those of a third party), including the need to comply with a funding agreement to provide a service, and your interests and fundamental rights do not override those interests.
- Where we need to comply with a *legal* or regulatory obligation.

4.2 Purposes for Processing your Personal Data

Set out below is a description of the ways we intend to use your personal data and the legal grounds on which we will process such data. (We have also indicated what our legitimate interests are where relevant.)

We may process your personal data for more than one lawful ground, depending on the specific purpose for which we are using your data. Please contact us if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

Purpose / Activity	Type of data	Lawful bases for processing (The six lawful bases for processing are set out in Article 6 of the GDPR: Consent, Contract, Legal obligation, Vital interests, Public task and Legitimate interests.)
To manage your enquiry to our Advice and Information Service	<ul style="list-style-type: none"> • Identity • Contact • Sensitive • Financial 	<ul style="list-style-type: none"> • Contract • Legitimate interests (The provision of our service to you)
To register you as a Shopmobility Service user and manage your equipment bookings	<ul style="list-style-type: none"> • Identity • Contact • Sensitive • Financial 	<ul style="list-style-type: none"> • Contract • Legitimate interests (The provision of our service to you)
To register you as a Volunteer & Learning Service user and manage the service	<ul style="list-style-type: none"> • Identity • Contact • Sensitive • Financial 	<ul style="list-style-type: none"> • Contract • Legitimate interests (The provision of our service to you)
To register you as an Access Group member and manage the service	<ul style="list-style-type: none"> • Identity • Contact • Sensitive 	<ul style="list-style-type: none"> • Contract • Legitimate interests (The provision of our service to you)
To manage a project or activity associated with our above services or our charity's core purpose	<ul style="list-style-type: none"> • Identity • Contact • Sensitive 	<ul style="list-style-type: none"> • Contract • Legitimate interests (The provision of our service to you)
To process your order for products or services including: Managing payments, fees and charges Collecting and recovering money owed	<ul style="list-style-type: none"> • Identity • Contact • Financial • Transaction 	<ul style="list-style-type: none"> • Contract • Legitimate interests (The provision of our service to you and to recover debts owed to us)
To process donations from you including:	<ul style="list-style-type: none"> • Identity • Contact 	<ul style="list-style-type: none"> • Contract • Legitimate interests

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Managing our lottery	<ul style="list-style-type: none"> • Financial • Transaction 	
To manage our relationship with you including: Notifying you about changes to our terms or conditions	<ul style="list-style-type: none"> • Identity • Contact 	<ul style="list-style-type: none"> • Consent • Legal obligation • Legitimate interests
To administer and protect our business	<ul style="list-style-type: none"> • Identity • Contact • Technical 	<ul style="list-style-type: none"> • Legitimate interests
To use data analytics to improve our website, products/services, customer relationships and experiences	<ul style="list-style-type: none"> • Technical 	<ul style="list-style-type: none"> • Legitimate interests
To keep you informed about the charity and make suggestions to you about activities, products or services which may be of interest	<ul style="list-style-type: none"> • Identity • Contact 	<ul style="list-style-type: none"> • Consent • Legitimate interests

4.3 Change of purpose

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to find out more about how the processing for the new purpose is compatible with the original purpose, please contact us. If we need to use your personal data for a purpose unrelated to the purpose for which we collected the data, we will notify you and we will explain the legal ground of processing. We may process your personal data without your knowledge or consent where this is required or permitted by law.

5. Disclosures of Your Personal Data

We may have to share your personal data with the parties set out below for the purposes set out in the table in paragraph 4 above:

- Service providers who provide IT and system administration services.
- Professional advisers including lawyers, bankers, auditors and insurers who provide consultancy, banking, legal, insurance, auditing and accounting services.
- HM Revenue & Customs, regulators and other authorities based in the United Kingdom and other relevant jurisdictions who require reporting of processing activities in certain circumstances.
- Third parties to whom we sell, transfer, or merge parts of our business or our assets.

- We require all third parties to whom we transfer your data to respect the security of your personal data and to treat it in accordance with the law. We only allow such third parties to process your personal data for specified purposes and in accordance with our instructions.

6. International Transfers

Countries outside of the European Economic Area (EEA) do not always offer the same levels of protection to your personal data, so European law has prohibited transfers of personal data outside of the EEA unless the transfer meets certain criteria. Some of our third parties service providers might be based outside the European Economic Area (EEA) so their processing of your personal data will involve a transfer of data outside the EEA. Whenever we transfer your personal data out of the EEA, we do our best to ensure a similar degree of security of data by ensuring at least one of the following safeguards is implemented:

- We will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data by the European Commission; OR
- Where we use certain service providers, we may use specific contracts or codes of conduct or certification mechanisms approved by the European Commission which give personal data the same protection it has in Europe; OR
- Where we use providers based in the United States, we may transfer data to them if they are part of the EUUS Privacy Shield which requires them to provide similar protection to personal data shared between the Europe and the US.

If none of the above safeguards is available, we may request your explicit consent to the specific transfer. You will have the right to withdraw this consent at any time. Please contact us if you want further information on the specific mechanism used by us when transferring your personal data out of the EEA.

7. Data Security

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those personnel, agents, contractors and other third parties who have a business need to know such data. They will only process your personal data on our instructions and they are subject to a duty of confidentiality. In the event that we encounter any suspected personal data breach we will notify you and any applicable regulator of the breach where we are legally required to do so.

8. Data Retention

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements. To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process

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your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

By law we have to keep certain financial information about our customers (including Contact, Identity, Financial and Transaction Data) for six years after they cease being customers for Her Majesty's Revenue & Customs (HMRC) purposes. In some circumstances you can ask us to delete your data: see below for further information. In some circumstances we may anonymise your personal data (so that it can no longer be associated with you) for statistical purposes, including monitoring for funding agreements, in which case we may use this information indefinitely without further notice to you.

9. Your Legal Rights

Under certain circumstances, you have rights under data protection laws in relation to your personal data. These include the right to:

- Request access to your personal data.
- Request correction of your personal data.
- Request erasure of your personal data.
- Object to processing of your personal data.
- Request restriction of processing your personal data.
- Request transfer of your personal data.
- Withdraw consent.

You can see more about these rights at: <https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/> . If you wish to exercise any of the rights set out above, please email or write to us. You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

We will try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

10. Third Party Links

Our website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy notice of every website you visit.

11. Cookies

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of our website may become inaccessible or not function properly.

If you are not happy with any aspect of how we collect and use your data, you have the right to complain to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues (www.ico.org.uk). We shall be grateful if you will contact us first if you do have a complaint so that we can try to resolve it for you.

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