

FULL POLICY

LEGITIMATE INTEREST PRIVACY POLICY FOR CLIENTS, EMPLOYEES AND PARTNERS

1. What is the purpose of this document?

1.1 Quo Vadis Trust are a "data controller". This means that we are responsible for deciding how we hold and use personal information about you. You are being provided with a copy of this privacy notice because your details have been obtained either directly from your request for housing provision or care facilities, application for an advertised position, employment, or in dealing with us as a service provider. It makes you aware of how and why your personal data will be used, namely for the purposes of the housing, employment or contracted services, and how long it will usually be retained for. It provides you with certain information that must be provided under the General Data Protection Regulation ((EU) 2016/679) (GDPR).

2. Data protection principles

2.1 We will comply with data protection law and principles, which means that your data will be:

- (a) Used lawfully, fairly and in a transparent way.
- (b) Collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes.
- (c) Relevant to the purposes we have told you about and limited only to those purposes.
- (d) Accurate and kept up to date.
- (e) Kept only as long as necessary for the purposes we have told you about.
- (f) Kept securely.

3. The kind of information we hold about you

3.1 We will collect, store, and use the following categories of personal information about you:

- (a) The information you have provided on our application forms, including name, title, address, telephone number, personal email address, work email address, date of birth, gender etc.,
- (b) Employment records (including job titles, work history)
- (c) Financial Data includes bank account and payment card details.
- (d) Transaction Data includes details about payments to and from you.
- (e) Usage data, how you use our services and/or web site
- (f) Identity Data for example name, marital status, title and gender
- (g) Medical, treatment or Care data
- (h) Previous Service Provider details

(i) Contact data

4. How is your personal information collected?

We use different methods to collect data from and about you including through:

(4.1) Direct interactions

You may give us your Identity, Contact and Financial Data by filling in forms or by corresponding with us by post, phone, email or otherwise.

(4.2) Automated technologies or interactions

As you interact with our website, we may automatically collect Technical Data about your equipment, browsing actions and patterns. We may collect this personal data by using cookies, server logs and other similar technologies.

(4.3) Third parties or publicly available sources

We may receive personal data about you from various third parties including other charities, Housing providers, Medical or Care Providers.

5. How we will use information about you

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

Where we need to perform the services we provide.

As part of our employment procedures.

Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.

Where we need to comply with a legal or regulatory obligation.

Generally we do not rely on consent as a legal basis for processing your personal data other than in relation to sending third parties. You have the right to withdraw consent at any time by contacting us.

6. If you fail to provide personal information

6.1 If you fail to provide information when requested, which is necessary for us to consider your application for services or employment, we may not be able to process your application for services housing or employment successfully. For example, if we require references or medical data and you fail to provide us with relevant details, we may not be able to take your application further. Similarly, we may be unable to perform any contract of service provision that we enter into with you.

7. Change of purpose

7.1 We will only use your personal information 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 we need to use your personal information for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

7.2 Please note that we may process your personal information without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

8. How we use particularly sensitive personal information

8.1 "Special categories" of particularly sensitive personal information require higher levels of protection. We have put in place appropriate safeguards which we are required by law to maintain when processing such data however we need to have further justification for collecting, storing and using this type of personal information. With this in mind we may process special categories of personal information in the following circumstances:

- (a) In limited circumstances, with your explicit written consent.
- (b) Where we need to carry out our legal obligations or exercise rights in connection with the law.
- (c) Where it is needed in the public interest.

8.2 Less commonly, we may process this type of information where it is needed in relation to legal claims or where it is needed to protect your interests (or someone else's interests) and you are not capable of giving your consent, or where you have already made the information public. We may also process such information about employees, clients and partners or former employees and clients in the course of legitimate business activities with the appropriate safeguards.

8.3 We will use your particularly sensitive personal information in the following ways:

- (a) We will use information about your Housing, Care or employment needs to consider whether we need to provide appropriate adjustments, for example whether adjustments need to be made to employ or accommodate you within our services.
- (b) We may use information about your race or national or ethnic origin for the purposes of assessing the right to reside or to work in the UK.
- (c) We may use information relating to absences, which may include sickness absence or family related leave, to comply with employment and other laws.

9. Do we need your consent?

We do not need your consent if we use special categories of your personal information in accordance with our written policy to carry out our legal obligations or exercise specific

rights in law. In limited circumstances, we may approach you for your written consent to allow us to process certain particularly sensitive data. If we do so, we will provide you with full details of the information that we would like and the reason we need it, so that you can carefully consider whether you wish to consent. You should be aware that it is not a condition of your contract with us to provide housing and care services or employment that you agree to any request for consent from us.

10. Information about criminal convictions

10.1 We may only use information relating to criminal convictions or activity where the law allows us to do so. This will usually be where such processing is necessary to carry out our obligations.

11. Automated decision-making

11.1 You will not be subject to decisions that will have a significant impact on you based solely on automated decision-making.

12. Data sharing

12.1 We will only share your personal information with third parties after obtaining your consent to do so, for the purposes of processing your application for employment or Housing and Care Services and for undertaking a contract we have with you - such as moving to a new service provider or employer. At the point of obtaining your consent, we will disclose to you the third parties your personal information will be shared with.

13. Data security

13.1 We have put in place appropriate security measures to prevent your personal information from being accidentally lost, used or accessed in an un-authorized way, altered or disclosed. In addition, we limit access to your personal information to those employees, partners and contractors who have a business need-to-know. They will only process your personal information on our instructions and they are subject to a duty of confidentiality.

13.2 We have put in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so.

14. 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 (record retention periods), 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 un-authorized use or disclosure of your personal data, the purposes for which we process your personal

data and whether we can achieve those purposes through other means, and the applicable legal requirements. In some circumstances you can ask us to delete your data.

15. Rights of access, correction, erasure, and restriction

15.1 Your rights in connection with personal information

Under certain circumstances, by law you have the right to:

(a) **Request access** to your personal information (commonly known as a "data subject access request"). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.

(b) **Request correction** of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.

(c) **Request erasure** of your personal information. This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal information where you have exercised your right to object to processing (see below).

(d) **Object to processing** of your personal information where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground. You also have the right to object where we are processing your personal information for direct marketing purposes.

(e) **Request the restriction of processing** of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.

(f) **Request the transfer** of your personal information to another party.

If you want to review, verify, correct or request erasure of your personal information, object to the processing of your personal data, or request that we transfer a copy of your personal information to another party, please contact us in writing as set out below.

Quo Vadis Trust
92 Brownhill Road
London
SE6 1LF

16. Data protection officer

16.1 We have a data protection officer (DPO) to oversee compliance with this privacy notice. If you have any questions about this privacy notice or how we handle your personal information, please contact our DPO by emailing Info@qvt.org.uk . You have the right to

make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues.

17. This policy under GDPR

We may amend, modify or replace this Privacy Policy at any time by amending the relevant forms or links on our website. You are responsible for checking the page or forms from time to time to take notice of any changes we make as this policy is important. Some of the provisions contained in this Privacy Policy may also be superseded by provisions, notices or forms in use elsewhere in Quo Vadis Trust or communicated to you in any other way.