

## **Privacy Notice**

#### Who we are

Professionals Aid Council, operating as Professionals Aid Guild, 7-14 Great Dover Street, London SE1 4YR. Our email address is admin@professionalsaid.org.uk

## The categories of personal data we collect

Please see our Privacy Policy for the categories of data we collect.

## Why we collect data

We collect data so that we can assess applications for financial assistance and support from our charity. The lawful basis on which we then process the data is on the basis of your consent. In addition, we process data about third parties from your application and the lawful basis on processing that is on the basis of legitimate interest since we believe it is in our interest to further our charitable aims and objectives. Further details can be found in our Privacy Policy.

## How we collect data

We do this when you submit an application to us either online or via a written application or contact us online.

## When we share your data

We might need to share your data with third parties to help us provide a better service for you. This might include giving limited data to our banks, accountants and auditors so that they can process any financial award and to comply with our auditing obligations.

# What choices you have about your data

You have rights regarding your personal data including seeing what data we have and updating it. Please see our Privacy Policy.

# How long is data kept?

Once an application for financial assistance has been determined and this has been communicated to you, we will then retain your data for up to two years.

You can read more information about how data is collected, stored and rights in relation to here, in our Privacy Policy

#### **PRIVACY POLICY**

#### WHAT IS THE PURPOSE OF THIS DOCUMENT?

Professionals Aid Council is a "data controller". This means that we are responsible for deciding how we hold and use personal information about you. We have prepared this policy because you are applying for financial assistance from us. It makes you aware of how and why your personal data will be used, namely for the purposes of your application, 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).

#### **DATA PROTECTION PRINCIPLES**

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

- 1. Used lawfully, fairly and in a transparent way.
- 2. Collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes.
- 3. Relevant to the purposes we have told you about and limited only to those purposes.
- 4. Accurate and kept up to date.
- 5. Kept only as long as necessary for the purposes we have told you about.
- 6. Kept securely.

#### THE KIND OF INFORMATION WE HOLD ABOUT YOU

In connection with your application for financial assistance from us, we will collect, store, and use the following categories of personal information about you:

- 1. The information you have provided to us in your application form and covering correspondence and this will include:
- 2. name, title, address, telephone number, personal email address, date of birth, residency status, employment history, qualifications, financial information
- 3. details of any medical condition or disability including any supporting documentation provided by a health professional
- 4. Personal information relating to your personal circumstances including who lives with you, your relationship with them, who owns any property you live in;
- 5. Information regarding your household income, expenses, debts and savings;
- 6. Information relating to any other applications for funding or financial assistance you may have made;

We may also collect, store and use the following "special categories" of more sensitive personal information:

- 1. Information about your race or ethnicity, religious beliefs, sexual orientation and political opinions.
- 2. Information about your health, including any medical condition, health and sickness records.
- 3. Information about criminal convictions and offences.

### **HOW IS YOUR PERSONAL INFORMATION COLLECTED?**

We only collect data when you chose to supply it to us. You do not have to supply it to us but if you do not supply it then it may limit how we may able to assist you financially.

#### **HOW WE WILL USE INFORMATION**

We will use the personal information we collect about you to:

- 1. Assess your application for financial assistance.
- 2. We do not disclose information to third parties except to carry out background and reference checks, where applicable.
- 3. If we are under a duty to disclose or share your personal data in order to comply with any legal obligation (for example, if required to do so by a court order or for the purposes of fraud prevention
- 4. Communicate with you about the application process.
- 5. Keep records related to our application processes.
- 6. Comply with legal or regulatory requirements.

It is in our legitimate interests to decide whether to assist you financially since it would further the objectives of our charity. It is for this reason we collect data about third parties such as financial information, household income and expenditure, educational qualifications and professional career information, as part of our application process.

Having received your application form and conducted any follow up enquiries with you we will then process that information to decide whether you meet the basic requirements to be considered eligible for financial assistance. If you do, we will decide whether your application is strong enough to be put forward to our case committee who will make a decision on your application. The case committee will review the information provided as part of your application. If we decide to offer you financial assistance we will seek satisfactory references before confirming your approval for financial assistance.

## If you fail to provide personal information

If you fail to provide information when requested, which is necessary for us to consider your application (such as evidence of qualifications, income or work history), we will not be able to process your application successfully. For example, if we require copy bank statements and you fail to provide us with relevant details, we will not be able to take your application further.

### HOW WE USE PARTICULARLY SENSITIVE PERSONAL INFORMATION

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

• We will use information about your health to consider whether we need to provide appropriate adjustments during the application process, for example whether adjustments need to be made to the application process.

#### INFORMATION ABOUT CRIMINAL CONVICTIONS

We do not require information about any criminal convictions and therefore do not envisage we will process this information.

#### **AUTOMATED DECISION-MAKING**

You will not be subject to decisions based on automated decision-making.

### **DATA SHARING**

### Why might you share my personal information with third parties?

We will only share your personal information with the following third parties for the purposes of processing your application: Banks, accountants, auditors and legal advisors. All our third-party service providers are required to take appropriate security measures to protect your personal information in line with our policies. We do not allow our third-party service providers to use your personal data for their own purposes. We only permit them to process your personal data for specified purposes and in accordance with our instructions.

#### **DATA SECURITY**

We have put in place appropriate security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal information to those employees, agents, contractors and other third parties 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.

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.

## **DATA RETENTION**

### How long will you use my information for?

We will retain your personal information for a period of two years after we have communicated to you our decision about whether to grant you financial assistance. If you are granted a repayable grant we will retain your data until 2 years after your repayable grant is repaid. We retain your personal information for that period so that we can show we complied with our charitable objectives and in the event of a legal claim, that we have not discriminated against applicants on prohibited grounds and that we have conducted the application exercise in a fair and transparent way. After this period, we will securely destroy your personal information in accordance with our data retention policy.

## RIGHTS OF ACCESS, CORRECTION, ERASURE, AND RESTRICTION

## Your rights in connection with personal information

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

- 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.
- **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.
- 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).
- **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.
- 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.
- 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 the Chief Operating Officer by email (<a href="mailto:admin@professionalsaid.org.uk">admin@professionalsaid.org.uk</a>) or in writing: Professionals Aid Guild, 7-14 Great Dover Street, London SE1 4YR

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.

## **RIGHT TO WITHDRAW CONSENT**

When you applied for financial assistance, you provided consent to us processing your personal information for the purposes of the application process. You have the right to withdraw your consent for processing for that purpose at any time. To withdraw your consent, please contact the Chief Operating Officer (admin@professionalsaid.org.uk) or in writing. Once we have received notification that you have withdrawn your consent, we will no longer process your application and, subject to our retention policy, we will dispose of your personal data securely.