



Privacy Policy

The Company is aware of its obligations under the General Data Protection Regulation (GDPR) and domestic data protection legislation, and is committed to processing your data securely and transparently. This privacy notice sets out, in line with current data protection obligations, the types of data that we hold on you as a beneficiary of the Company. It also sets out how we use that information, how long we keep it for and other relevant information about your data.

This notice applies to current and former beneficiaries.

Data controller details

The Company is a data controller, meaning that it determines the processes to be used when using your personal data. Our contact details are as follows: *Your Own Place CIC, 23 Johnson Place, Norwich, NR2 2SA* rebecca@yourownplace.org.uk.

Data protection principles

In relation to your personal data, we will:

- Process it fairly, lawfully and in a clear, transparent way
- Collect your data only for reasons that we find legitimate for the course of your interaction with us in ways that have been explained to you
- Only use it in the way that we have told you about
- Ensure it is correct and up to date
- Keep your data for only as long as we need it
- Process it in a way that ensures it will not be used for anything that you are not aware of or have consented to (as appropriate), lost or destroyed
- Delete or share it at your request

Types of data we process

We hold many types of data about you, including:

- Your personal details including your name, address, date of birth, personal email address, phone numbers
- Your photograph
- Your housing situation
- Your learning needs
- Your gender and sexuality
- Your criminal convictions
- Your care status



your own place

- Your marital status and dependents
- Your health needs - mental and physical
- Learning needs
- Information used for equal opportunities monitoring about your sexual orientation, religion or belief and ethnic origin

How we collect your data

We collect data about you in a variety of ways and this will usually start when we receive a referral or start a conversation with you. We will always tell you that we are doing this and seek written consent.

Further information will be collected directly from you as well as your referrer.

Data will be kept in an encrypted database and subject to a Data Destruction timeline proportionate to its usage across all systems.

Elsewhere it will be deleted immediately and/or anonymised.

Why we process your data

The law on data protection allows us to process your data for certain reasons only:

- In order to deliver a service to you
- In order to carry out legally required duties
- In order for us to carry out our legitimate interests
- To protect your interests and
- To meet your needs to ensure you get the best service
- Where we have obtained your consent

All of the processing carried out by us falls into one of the permitted reasons.

Generally, we will rely on the first three reasons set out above to process your data.

For example, we need to collect your personal data in order to:

- Deliver a service
- Report on the service you have received

We also need to collect your data to ensure we are complying with legal requirements such as:

- Making reasonable adjustments for disabled individuals.



Special categories of data

Special categories of data are data relating to your;

- health
- sex life
- sexual orientation
- race
- ethnic origin
- political opinion
- religion

We must process special categories of data in accordance with more stringent guidelines. Most commonly, we will process special categories of data when the following applies:

- You have given explicit consent to the processing
- We must process the data in order to carry out our legal obligations
- We must process data for reasons of substantial public interest
- You have already made the data public

We will use your special category data:

- For the purposes of equal opportunities monitoring
- To determine how we might meet your needs and support you

We will always ask for your consent to allow us to process certain particularly sensitive data. If this occurs, you will be made fully aware of the reasons for the processing. As with all cases of seeking consent from you, you will have full control over your decision to give or withhold consent and there will be no consequences where consent is withheld. Consent, once given, may be withdrawn at any time. There will be no consequences where consent is withdrawn.



Criminal conviction data

We will collect criminal conviction data where it is appropriate given the nature of our intervention and where the law permits us. This data will usually be collected at the referral stage. We use criminal conviction data in the following ways:

- To determine any risks to yourself or others in working with you.

We rely on the lawful basis of safeguarding vulnerable people to process this data.

If you do not provide your data to us

One of the reasons for processing your data is to allow us to carry out our duties in line with your work with us. If you do not provide us with the data needed to do this, we will be unable to perform those duties, e.g. ensuring your needs are met. This may prevent us from working with you.

Sharing your data

Your data will be shared with colleagues within the Company only, where it is necessary for them to undertake their duties. This includes, for example, the facilitators and their manager.

We do not share your data with bodies outside of the European Economic Area.

Protecting your data

We are aware of the requirement to ensure your data is protected against accidental loss or disclosure, destruction and abuse. We have implemented processes to guard against such. Alongside our GDPR Policy, Your Own Place operates a Data Destruction Schedule for the time bound deletion of personal data in accordance with the law. This is renewed biannually.

How long we keep your data for

In line with data protection principles, we only keep your data for as long as we need it, which will be at least for the duration of your intervention and one annual cycle of reporting. Retention periods can vary depending on contracts with commissioners and reporting cycles. Feel free to ask us about this.



Automated decision making

No decision will be made about you solely on the basis of automated decision making (where a decision is taken about you using an electronic system without human involvement) which has a significant impact on you.

Your rights in relation to your data

The law on data protection gives you certain rights in relation to the data we hold on you. These are:

- The right to be informed. This means that we must tell you how we use your data, and this is the purpose of this privacy notice
- The right of access. You have the right to access the data that we hold on you. To do so, you should make a subject access request and the right for any inaccuracies to be corrected. If any data that we hold about you is incomplete or inaccurate, you are able to require us to correct it
- The right to have information deleted. If you would like us to stop processing your data, you have the right to ask us to delete it from our systems where you believe there is no reason for us to continue processing it
- The right to restrict the processing of the data. For example, if you believe the data we hold is incorrect, we will stop processing the data (whilst still holding it) until we have ensured that the data is correct
- The right to portability. You may transfer the data that we hold on you for your own purposes
- The right to object to the inclusion of any information. You have the right to object to the way we use your data where we are using it for our legitimate interests
- The right to regulate any automated decision-making and profiling of personal data. You have a right not to be subject to automated decision making in way that adversely affects your legal rights.

Where you have provided consent to our use of your data, you also have the unrestricted right to withdraw that consent at any time. Withdrawing your consent means that we will stop processing the data that you had previously given us consent to use. There will be no consequences for withdrawing your consent. However, in some cases, we may continue to use the data where so permitted by having a legitimate reason for doing so.



If you wish to exercise any of the rights explained above, please contact rebecca@yourownplace.org.uk.

Making a complaint

The supervisory authority in the UK for data protection matters is the Information Commissioner's Office (ICO). If you think your data protection rights have been breached in any way by us, you are able to make a complaint to the ICO.

Data Protection Officer

The Company's Data Protection Officer is Rebecca White. She can be contacted on 07530 028446.