

Protecting your privacy

This Privacy Notice explains the types of personal data we may collect about you when you interact with us. It also explains how we'll store and handle and keep that data safe.

The following sections will answer any questions you have but if not, please do get in touch by post, telephone or email. Contact details are shown below.

It's likely that we'll need to update this Privacy Notice from time to time, and you are welcome to come back and check this at any time or contact us by any of the means shown below.

The law on data protection sets out a number of different reasons or conditions for which an organisation may collect and process your personal data, including:

1. Consent

In specific situations, we can collect and process your data with your consent. This might include when you tick a box to receive an email about ways you can support us or to receive information about the Royal Alfred Seafarers' Society or our facilities. On occasion when you make an enquiry we may collect your Implied Consent to enable us to send your information you have requested. This might include, for example information about our resident services. When collecting your personal data, we'll always make clear to you what data is necessary and for what purpose.

2. Contractual obligations

In certain circumstances, we need your personal data to comply with our contractual obligations, for example, if you are paying for a resident placement. Or if you give a donation to Royal Alfred Seafarers' Society and agree to Gift Aid or if you set up a regular gift by Direct Debit.

3. Legal compliance

If the law requires us to we may need to collect and process your data, for example we can pass on details of people involved in fraud or other criminal activity affecting Royal Alfred Seafarers' Society to law enforcement agencies.

4. Legitimate interest

In specific situations, we require your data to pursue our legitimate interests in a way which might reasonably be expected when we pursue our aims and objectives as an organisation and which does not materially impact your rights, freedom or interests.

Royal Alfred Seafarers' Society has a legitimate interest in maintaining a record of its activities as part of a long-established organisation with a strong identity and history, and in maintaining such records for future research. This will include records of past residents and their service details. We will also use our Legitimate Interest to keep relevant information on staff, governance, finance, and legal records of buildings and maintenance for the Royal Alfred Seafarers' Society.

We will also use your address details to send you information that we think might interest you where this is appropriate.

5. When we collect your data:

When you visit our website, we may collect your IP Address, page visited, web browser, any search criteria entered, previous web page visited and other technical information. This information is used solely for web server monitoring and to deliver the best visitor experience. Additional data may be collected in forms for specific functions. For your security, we use all appropriate organisational and technical security controls to safeguard your data.

When we interact with you we may also collect notes from our conversations with you, details of any complaints or comments you make. We might record your age or identity where the law requires this.

We may use technology such as cookies to help us deliver relevant and interesting content in our communications in the future. We may use information we collect to display the most interesting content to you on our website we may use data we hold about your previous visits.

We'll only ask for and use your personal data collected for the purpose stated at the point at which it is collected. If we believe your data is no longer needed for this purpose we will not process your data further.

Your image may be recorded on CCTV when you visit our premises. Your car number plate may be recorded too.

Special category data

"Special categories" of particularly sensitive personal data require higher levels of protection. We need to have further justification for collecting, storing and using this type of personal data. We aim to collect and process special category data as little as possible. Generally, we will only collect information on your health where we are legally obliged. This is to uphold our duty of care and to ensure the safeguarding of residents, job candidates, employees and visitors. Other special categories of data may be revealed to us by data subjects during the course of their stay or visit or employment. We do not strictly process this information but acknowledge it may on occasion be recorded. The Royal Alfred Seafarers' Society will document all incidents of its processing of special category data in our Information Asset Register, and will be preparing a separate document itemising all of these, with reasons, having conducted assessment on each occasion.

The Special Categories of personal data consist of data revealing:

- · racial or ethnic origin;
- political opinions;
- religious or philosophical beliefs;
- trade union membership.

They also consist of the processing of:

- genetic data;
- biometric data (e.g. fingerprints) for the purpose of uniquely identifying someone;
- data concerning health;
- data concerning someone's sex life or sexual orientation.

We may process special categories of personal data in the following circumstances:

- With your explicit written consent; or
- Where it is necessary in the substantial public interest, and further conditions are met;
- Where the processing is necessary for archiving purposes in the public interest, or for scientific or historical research purposes, or statistical purposes, subject to further safeguards for your fundamental rights and interests specified in law;
- Where there is a legal obligation.

Further legal controls apply to data relating to criminal convictions and allegations of criminal activity. We may process such data on the same grounds as those identified for "special categories" referred to above.

6. What are my rights?

You have the right of access to the personal information we may hold about you. This is free of charge and will be supplied to you within one month of your request.

You can object to our processing of your personal information for direct marketing purposes.

Consent-based processing of your personal data will cease after you withdraw your consent.

When you withdraw consent, or object and we do not have a legitimate interest to continue, or once the purpose for which we hold the data has ended your information may be deleted from our records, archived or anonymised. We may however, keep it if we have a legal obligation.

You have the right to challenge automated decisions we make about you. You may ask for these to be assessed by one of our staff.

You have the right to request a copy of any information about you that Royal Alfred Seafarers' Society may hold at any time to check whether it is accurate. To ask for your information, please contact Data Protection Officer, Royal Alfred Seafarers' Society on

Whenever you have given us your consent to use your personal data you have the right to change your mind and stop future communications. You may also opt out in some cases of our processing of your data where we have a Legitimate Interest.

To protect the confidentiality of your information and the interests of the Royal Alfred Seafarers' Society, we will ask you to verify your identity before proceeding with any request for information. If you have authorised a third party to submit a request on your behalf, we will ask them to prove they have your permission to request such information.

We may send you relevant and personalised communications by post. We'll do this on the basis of our Legitimate Interest but only after certain risk assessments have been undertaken.

You are free to opt out of hearing from us by post at any time.

Sometimes we are required to inform you about certain changes. For example, updates to this Privacy Notice and where we have a legal obligation such as a duty of care or safeguarding. These administrative messages will not include any fundraising or marketing content and do not require prior consent when sent by email. If we didn't use your personal data for these purposes, we would be unable to comply with our legal obligations.

We may use your data to send you a survey and feedback requests to help improve the way we communicate. These messages will not include any fundraising requests or marketing and do not require prior consent when sent by email. We have a legitimate interest to do so as this helps improve our services and make them more relevant to you.

Of course, you are free to opt out of receiving any of these communications.

7. Data retention

Whenever we collect or process your personal data, we'll only keep it for as long as is necessary for the purpose for which it was collected.

At the end of that retention period, your data will either be deleted completely, put beyond use or anonymised.

If you have not engaged with us for more than five years, you will be flagged as inactive and we'll contact you to ask whether you want us to keep your data or not. Unless you reply to say 'yes', we will delete or anonymise the personal data. However, we assume that pass and present residents of the Royal Alfred Seafarers' Society will expect to continue receiving information and their records kept as a reflection of the history and heritage of the Royal Alfred Seafarers' Society .

8. Protecting your data outside the EEA

Occasionally we will need to share your personal data with third parties and suppliers outside the European Economic Area (EEA).

The EEA includes all EU Member countries as well as Iceland, Liechtenstein and Norway. We may transfer personal data that we collect from you to third-party data processors in countries that are outside the EEA such the USA.

For example, this might be required when we store data in a Cloud Service. If we do this, we have procedures in place to ensure your data receives the same protection as if it were being processed inside the EEA, and we will treat the information under the guiding principles of this Privacy Notice.

9. Stopping us from using your data in the future

There are several ways you can stop communications from the Royal Alfred Seafarers' Society:

Click the 'unsubscribe' link in any email communication that we send you. We will then stop any further emails and will 'Forget' your information in line with your rights unless we have a legal obligation to keep it. You can also stop communications by contacting us using the information below. Remember some administrative communications for current residents and their families and friends cannot be stopped.

10. How to complain about our processing of your data

If you feel that your data has been handled incorrectly, or you are unhappy with the way we have dealt with your query about the way we use your personal data, you have the right to complaint to the Information Commissioner's Office (ICO) which regulates the use of information in the UK.

You can call them on <u>0303 123 1113</u> or go online to <u>www.ico.org.uk/concerns</u>

If you are based outside the UK you have the right to complaint to the relevant data protection supervisory authority in your country.

If you would like to discuss any aspect of this policy or the way Royal Alfred Seafarers' Society processes your information please contact;

The Data Protection Officer;

By Post -

By Email -

By Telephone -