



hillside clubhouse

## PRIVACY POLICY

This Privacy Policy tells you what personal information we collect, why we collect it and what we do with it ('personal information' is any information that identifies or could identify you).

**When you engage with us or use our services, we understand that you are sharing data with us that is personal and could be sensitive as well. We are clear that this data is yours. We ensure that we comply to all aspects of data protection law to ensure that your information remains protected.**

From time to time we may need to make changes to this Privacy Policy, for example, as the result of government regulation or other developments in data protection laws or privacy generally. This version was last updated on 12<sup>th</sup> September 2021. You should check our website from time to time, to view the most up to date Privacy Policy.

When you provide us with your personal information you acknowledge that we may use it in the ways set out in this Privacy Policy. This policy sets out:

1. Who we are
2. Our Privacy Principles
3. How we collect and use your personal information
4. The personal information we collect
5. Our legal basis for processing your personal information
6. Who we share your personal information with
7. How long we keep records for
8. Your rights
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## 1. Who we are

Hillside Clubhouse is a registered charity (no 1080735) and company limited by guarantee (no 3912530). Our registered office address is Unit A, 30 North Road, London N7 9GJ. For the purpose of this Privacy Policy, references to “we”, “us” or “our” refers to Hillside Clubhouse. We are the data controller of your personal information and are responsible for complying with data protection laws.

You can contact us by:

- Writing to us at the above address;
- Emailing us at [enquiries@hillsideclubhouse.org.uk](mailto:enquiries@hillsideclubhouse.org.uk)
- Calling us on 020 7700 6408

## 2. Our Privacy Principles

When we collect and use your personal information, we ensure that we look after it properly and use it in accordance with the principles set out below:

- a. The personal information you provide is processed fairly, lawfully and we are transparent with you about what we use it for;
- b. We only use your personal information for the purposes we have told you;
- c. We only collect information that is required for the purpose for which it is processed;
- d. Your personal information is kept accurate and up to date, where necessary;
- e. We only keep your personal information for as long as is necessary for the purposes for which it has been processed, or required by law;
- f. We take appropriate steps to keep your personal information secure;
- g. We do not ever sell your personal information and only share it with organisations who assist in providing you with our services.

## 3. How we collect and use your personal information

Much of the information we collect will have been provided by you, but some may also come from other sources such as your support worker or in some cases external sources such as clinicians (e.g., risk assessments).

We collect your personal information in the following ways:

- a. **When you interact with us directly:** This could be if you engage for our services, register with us for training or an event, make a donation to us, apply for a volunteering opportunity or otherwise provide us with your personal information. This includes when you visit our Clubhouse, phone us, visit our website, or get in touch by email or post.



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- b. When you are referred to us through third parties:** This could be if you are referred to us through our network, such as clinicians, social workers or other agencies or individuals. Your personal information may be provided to us from a third-party organization.
- c. When you are engaged with us to provide our services:** This could be if you engage with us for a service such as finding a job, training, volunteering opportunity or other opportunity enabled by the Clubhouse or arising as part of your day-to-day membership of Hillside Clubhouse
- d. When you provide a donation:** If you provide your consent for your personal information to be shared with us.
- e. When you visit our website:** When you access our website, we may collect information from you from any forms that you complete or through the use of cookies and similar technologies. We do not use non-essential cookies on our website currently.

### 4. The personal information we collect

The personal information we collect may include:

- a. Your full name, postal address, email address, telephone number and financial information (e.g., bank details and credit/debit card details). We may collect this information when you register for our services or an event, or if you are making a donation;
- b. Information related to your life stage (e.g., whether you have dependents, clinical background, or your work status, or the relationship to other people associated with you. Apart from the information we require to provide our services, it's up to you how much information you choose to share with us;
- c. Information such as your date of birth, passport and driving license details when you use services that require identity verification or require specific skills;
- d. For the purposes of monitoring;
- e. The information we gather during our work with you will help us to identify your skills, abilities, likes and dislikes to support your employment and life ambitions if appropriate.
- f. During our work with you we will also gather information about your personal and financial circumstances so that we can help match you to the job of your choice if appropriate. We may also seek information from elsewhere, but this information is only intended to ensure that we can provide you with the best and most appropriate support to achieve the best outcomes.

Data protection law identifies some information as being considered more sensitive, and this is now known as 'Special Category Personal Data'. This includes information about a person's health, race, ethnic origin, political opinions, sex life, sexual orientation, religious beliefs, or criminal data. We will not collect any more Special Category Personal Data than is required, and is limited to:



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- g. Information about your plans for the future (e.g., areas of mental wellbeing and self-development you want to focus on in the future) that we collect when we ask you to set goals and allow you to review your progress;
- h. Details of your current or former physical or mental health or condition that we collect via questionnaires or assessments, or from third party organisations that work with us, so that we can direct you to appropriate services and opportunities;
- i. For the purposes of dealing with your enquiries, or for evaluating the services and training we provide.

We will not pass on your details to anyone else without your express consent except in exceptional circumstances. Examples of this might include anyone reporting serious self-harm or posing a threat to others.

### **5. Our legal basis for processing your personal information**

- a. When we need your personal information to set you up as a member or service user, our legal basis is that the use is necessary to provide you with a service under contract. The type of data that we may process for this purpose will include but is not limited to: your contact and identifying details, as stipulated in Section 4a, 4b and 4c above; and information about your physical or mental health or condition as stipulated in Section 4g, 4h and 4i above;
- b. When we need your personal information to administer your membership, and provide our services, our legal basis for processing is that the use is necessary in order to take steps to provide you a service under contract and our legal basis for processing your Special Category Personal Data is that you have provided your explicit consent. Please note that, in some cases, if you do not provide your explicit consent, we may not be able to provide a service. The type of data that we may process for this purpose will include but is not limited to: your contact details and identifying details, as stipulated in Section 4a, 4b, 4c, 4d, 4e and 4f above; information about your location as stipulated in Section 4a above; your health as stipulated in Section 4h above; your financial and payment details (such as your bank account details) as stipulated in Section 4a above;
- c. When we need your personal information to quality check and develop our services further our legal basis is that we have a legitimate interest to assess and improve our services to ensure we are continually improving and updating our working practices for the benefit of our members. The type of data that we may process for this purpose will include but is not limited to: your contact and identifying details, as stipulated in Section 4a, 4b, 4c, 4d, 4e and 4f above; and information about your physical or mental health or condition as stipulated in Section 4g, 4h and 4i above;
- d. When we need your personal information to communicate with you and resolve any issues or complaints you may have our legal basis is that the use is necessary for our performance under



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our contract with you and we have a legitimate interest need to resolve any issues or complaints. The type of data that we may process for this purpose will include but is not limited to: your contact and identifying details, as stipulated in Section 4a, 4b, 4c, 4d, 4e and 4f above; and information about your physical or mental health or condition as stipulated in Section 4g, 4h and 4i above;

- e. When we need your personal information to update you with important administrative messages about your donation, an event or services or goods you have requested or engaged with us for the type of data that we may process for this purpose will include but is not limited to: your contact and identifying details, as stipulated in Section 4a above.

### **6. Who we share your personal information with**

The personal information we collect and process about you will mainly be used by our staff so that they can support you. We may also share information with third parties, and these are described below and in any separate data sharing agreement that we might agree with you. We won't share any of your personal information other than for the purposes described in this Privacy Policy. We will never sell or share your personal information with organisations so that they can contact you for any marketing activities, including your browsing activity from our website.

We will share your information with organisations involved in your recovery or delivering our services to you. These include but are not limited to: The Department for Work and Pensions, housing associations, landlords, medical professionals, utility companies and subcontractors.

When we are supporting our members to find a job then we may share your details with organisations or individuals to support your employment goals, e.g., with employers, recruiters, DWP etc.

We may disclose your information if required or permitted to do so by law or by regulatory bodies where there is a court order or statutory obligation.

### **7. How long we keep records for**

In most cases, we will keep your information for six years after our relationship with you has ended, but it will depend on what data we hold, why we hold it and what we are obliged to do by law.

We keep your personal information for as long as reasonably necessary to fulfil the relevant purposes set out in this Privacy Policy and in order to comply with our legal obligations.



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### 8. Your rights

You have various rights in respect of the personal information we hold about you. For example, you can ask us for a copy of the information we hold about you, ask us to correct mistakes, and sometimes even delete your information.

Please see below for further details about your rights. Please make requests by contacting us in writing, using the contact details in Section 1.

- a. **The right to access to your personal information:** You are entitled to a copy of the personal information that we hold about you. You can make a request for the information and we will provide it in most cases free of charge.
- b. **The right to rectification:** We take care to ensure that the information we hold about you is accurate. You can ask us to change or complete any inaccurate or incomplete personal information held about you.
- c. **Right to object:** You can object to the processing of your personal information where we are relying on a legitimate interest, as described in this Privacy Policy (e.g., if there is a particular situation that you want to object to).
- d. **Right to restriction of processing:** You can ask us to suspend using your personal information for a period of time (e.g., if you think that the data we hold about you is inaccurate).
- e. **Right to erasure:** You can request your personal information be deleted. We will delete your data provided we have no obligation to hold it for a minimum period (e.g., a financial record, or legal reason which means we cannot immediately comply you're your request).
- f. **Right to data portability:** You can ask us to provide you or a third party with the personal information that we hold about you in an electronic format.
- g. **Right not to be subject to automated-decision making:** Automated decision-making takes place when a decision is made about you without human intervention, by an electronic system. You have the right not to be subject to automated decisions that create legal decisions or that have a significant impact on you. We do not currently use any automated-decision making systems.
- h. **Right to withdraw consent:** For certain uses of your personal information, we will ask you for explicit consent. Where we do this, you have the right to withdraw your consent at any time.
- i. **Right to make a complaint:**  
If you wish to make a complaint, we would request that you initially contact us. We will always do our best to resolve any issues. However, you can also make a complaint to the data protection supervisory authority, the Information Commissioner's Office, <https://ico.org.uk/>

### 9. Marketing

We do not sell your data to any third parties for any purposes. Additionally, we do not use cookies or similar technologies at this time on our website for analytics or marketing purposes.