



## **Privacy Notice for RCS members, clients and users**

### **How we collect, store, protect and use the information you give us.**

#### **About us**

We are Rural Community Services (West Cheshire) and we are the organization that runs OPAL Services for older people in the rural areas of west Cheshire. We believe it's important to protect your personal information from unauthorized use. We are committed to giving you a service that meets your needs and at the same time keeping your information up to date and protecting your privacy.

#### **About this notice**

This privacy notice tells you how we use personal information about individuals. It applies to the information we hold about members, clients and users who take part in the services we run. It explains how we collect information about you and use it to give you an OPAL service.

#### **When you first get in touch**

One of our Organisers will contact you using the contact details you give to us and will discuss your requirements. If you decide to become a user of one of our services we will first ask you for your personal information relevant to the service you would like us to provide. Then we are likely ask you to complete and sign a consent form giving us permission to use your personal information for the purposes of providing you with a service. You will be able to withdraw your consent at any time.

#### **How we will use your information.**

We may use your information to:

- Give you the services you've asked for.
- Help run and improve our services— ones we've provided before, now or in the future.
- Create statistics that we may share with the organisations who provide funding for our services.
- Train our staff.
- Get in touch with you about events that we think may be of interest to you. That could be by email, phone, text, multimedia message or another form of electronic communication if you have given us permission to do so.
- We may also record any communications we have with you, such as phone conversations and emails. This is just to make sure we are providing you with a good service and we are meeting our regulatory and legal responsibilities.
- With your prior permission we may use photos we take of you and others to promote our services, for example in our annual report, on our website and on our social media pages.
- Deal with entries in a competition.
- Seek your views on our services.
- Process a donation from you.
- Notify you of a change to our services.

#### **How long we will keep your information.**

We will keep your information for as long as we are providing you with an OPAL service. After that we will keep it for 6 years unless the law or our contract of insurance requires something different.

## **How we will get in touch**

We'll use the contact information you've given us when we need to get in touch. One of our organisers may visit you at home but they will call you first to confirm that it is convenient. We might email you, give you a ring, send a text or use another form of electronic communication.

## **Sharing your information with others**

RCS and its OPAL Services will not share your personal information with others without your consent, except in the event of an emergency or if there are strong concerns about your safety or wellbeing. We will not release your information to 3<sup>rd</sup> parties for direct marketing purposes.

In order to provide you with a service, RCS may need your consent to share your information with our commissioners, who are the people who provide us with funding. Why? This is to meet our contractual obligations and to enable commissioners to monitor the delivery of services across the whole of west Cheshire. In some cases our commissioner may be acting as the organisation with legal responsibility for the information (known as the data controller). In this case we would advise you to read the commissioner's privacy policy in addition to this RCS privacy notice. Further details about each service are below.

### **For Breaktime members**

RCS is funded by Cheshire West and Chester Council (CWaC) and monitored by Cheshire and Warrington Carers Trust (C&WCT) to provide the OPAL Breaktime service. RCS is required to store information about you on the Upshot computer system. This means that CWaC and C&WCT can access some of your information in order to see how the service is running. For this reason you are advised to read the C&WCT and CWaC's data protection policies to see how they use and store your personal information.

### **For Carers Connect members**

RCS is commissioned by Cheshire and Warrington Carers Trust (C&WCT) to provide the OPAL Carers Connect service. Under this contract both C&WCT and the CWaC are the data controllers. RCS is required to store information about you on the Upshot computer system. This means that C&WCT and CWaC can access some of your information in order to see how the service is running. For this reason you are advised to read the C&WCT and CWaC's data protection policies to see how they use and store your personal information.

### **For GoOnline members**

RCS is the data controller for the GoOnline OPAL service. GoOnline members' information is held by RCS on your Organiser's laptop which is password protected. Your data is not shared with anyone outside RCS.

### **For New Horizon's members**

RCS is funded by Brightlife to provide the New Horizon's OPAL service. Brightlife is in turn hosted by Age UK Cheshire. Under this agreement, RCS is the data controller. RCS is required to supply some members' personal data to Brightlife. This is for the purpose of contract monitoring. New Horizon members may elect to take part in a research project for Brightlife that has its own optional consent process that is separate from the RCS consent process.

### **For OPAL Club members**

RCS is part-funded by Cheshire Community Action (CCA) to provide the OPAL Club services. Under this contract RCS shares data controller responsibilities with CCA. RCS is required to store information about you on the Upshot computer system. This means that CCA can access some of your information in order to see how the service is running. For this reason you are advised to read CCA's and CWaC's data protection policies to see how they use and store your personal information.

### **For What's Cooking members**

RCS is funded by Brightlife to provide the OPAL What's Cooking service. Brightlife is in turn hosted by Age UK Cheshire. RCS is the data controller for this service and does not routinely share your personal information with Brightlife or with Age UK Cheshire. What's Cooking members may elect to take part in a research project for Brightlife that has its own optional consent process that is separate from the RCS consent process.

All our third party service provider such as our IT support and email service providers are required to take appropriate security measures to protect your personal information. We do not allow our third party service providers to use your personal information for their own purposes.

### **Your rights**

1. You have a right to be informed about how RCS will use your personal information. This information is provided to you in this privacy notice. If you have any questions after reading this notice, please ask your Organiser.
2. You have the right to a copy of the personal information RCS holds on you. We ask you to put your requests in writing. We will not charge you for providing a copy of your information. If you want us to provide this, get in touch with your local Organiser or contact our Data Protection Officer at Rural Community Services (West Cheshire), P.O. Box 161, Whitchurch, SY13 9BG or email [gill.swash@opalservices.org.uk](mailto:gill.swash@opalservices.org.uk).
3. If you find that any information we have about you is inaccurate or incomplete you can ask us to put this right.
4. You have a right to ask us to erase the information we have about you. This is known as the right to be forgotten. You can do this by withdrawing your consent.
5. If you feel that RCS and/or its partner organisations are processing your data in a way you don't like, you have the right to restrict processing of your data. This may limit our ability to deliver you with your OPAL service and you should discuss this with your Organiser.
6. You have a right to request that your personal data be provided to you electronically.
7. You have the right to object to your data being processed by RCS or any of its partners.
8. You have the right for your information not to be subject to automated decision making.

## **Protecting your information**

We have procedures in place to protect the security of your personal information. Your paper records will be stored securely in locked cabinets. Information about you that we hold electronically will be stored on password-protected computers held by the RCS team. Any information containing personal information, that is required by our funders and commissioners, is transferred to them by internet network connections.

Within RCS, we may make your personal information available to the small number of staff and volunteers who need to know. We provide training for staff and volunteers to help them understand their obligations under the data protection regulations.

We have in place proportionate security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorized way, altered or disclosed. In addition we limit access to your personal information to those employees and volunteers who have a business need to know. 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.

## **If you have a complaint about the way we use your information**

You have a right to complain if you feel we are not using your information correctly or if you feel that we have not responded properly to your concerns about the way we use your personal information. You can complain by speaking to an Organiser or by writing to the RCS Data Protection Officer at: Rural Community Services (West Cheshire), P.O. Box 161, Whitchurch, SY13 9BG.

If you make a complaint to us and not satisfied with our response, you can complain to the Information Commissioner's office at Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF.

## **Further Information**

If you'd like any more information, or you have comments or questions about our data protection or privacy procedures, please write to us at: Rural Community Services (West Cheshire), P.O. Box 161, Whitchurch, SY13 9BG.

Or phone our Administrator on 07851 214 163

Or email us at: [info@opal.services.org.uk](mailto:info@opal.services.org.uk)

We may amend our data protection policy from time to time. You can email or write to us at any time to ask for a copy.