

# SHAP Ltd Privacy Notice

SHAP is committed to protecting and respecting your privacy. We take your privacy very seriously and therefore we urge you to read this Privacy Notice carefully as it contains key information about how we safeguard your information and the reasons why information is collected.

This notice tells you what to expect when SHAP collects personal information from you. It applies to information, we collect about:

- Visitors to our website,
- People who use our services,
- Job applicants and our current and former employees,
- Complainants and other individuals in relation to a subject access request, complaint or enquiry
- Students undertaking placements in the organisation
- Suppliers who provide services to or on behalf of the organisation
- People who make donations to the organisation.

Our Privacy Policy summarised below, explains what happens to any personal data that we collect from you. By using our website, you agree to this Privacy Policy and you consent to our use of cookies in accordance with the terms of this statement. Our Privacy Policy can be accessed on our website: [www.shap.org.uk](http://www.shap.org.uk)

We may change this Privacy Notice from time to time, so please check this page occasionally to ensure that you are happy with any changes. By using our website, you are agreeing to be bound by this Policy.

Any questions regarding our Privacy Notice and privacy practices should be sent by email to [cbu@shap.org.uk](mailto:cbu@shap.org.uk) or by writing to us at SHAP Ltd, Bearly House, 67 Liverpool Road, St Helens WA10 1PQ or our Data Protection Officer Janine Iyanda, who can be contacted either at the above address or by sending an email to [janineiyanda@shap.org.uk](mailto:janineiyanda@shap.org.uk). Alternatively, you can telephone us on 01744 454056.

## Who we are

SHAP Ltd is a registered charity (no 1075118) and company limited by guarantee (no 1946544). The registered address is SHAP Ltd, Bearly House, 67 Liverpool Road, St Helens WA10 1PQ. SHAP Ltd and its trading subsidiaries are registered with the Information Commissioners Office (ICO) in order to lawfully control and process personal information.

SHAP is a data controller (i.e. we are responsible for and control the processing of your personal information) and a data processor (i.e. we obtain, record, hold and transmit your personal information) for the purposes of the Data Protection Act 2018.

## Information we collect and why

In operating our website, we may collect and process the following data about you:

- Details of your visits to our website and the resources that you access including, but not limited to traffic data, location data, web logs and other communications data.
- The personal information we collect might include your name, address, email address, IP address and information regarding what pages are accessed on our website and when.
- If you make a donation online, your card information is not held by us, it is collected by our third-party payment processors, who specialise in the secure online capture and processing of credit/debit card transactions, as explained below.

We may also collect your personal data:

- when you apply to be supported by one of our services or are being supported currently by one of our services (information about your current accommodation situation and support needs, safeguarding information and details of other agencies that are or have been provided to you)
- when you provide your bank details for payment of rent and service charges that are payable for a property that you rent off us or if you are a company/individual that we do business with your bank details to enable payment to be made for services that you provide to us
- when you apply for a vacancy internally or externally, or when you register with us for recruitment & vacancy updates
- when we collect data through our implementation of any HR Employee Relations Policies (disciplinary, absence management)
- in the course of managing your employment with SHAP (for example for payment of salary or expenses)
- so that we can contact your next of kin if there is an emergency
- so that we can check your right to work documentation and other security screening information if you are an employee/applicant being considered for employment.

In the event that you provide us with any sensitive personal information, we will take extra care to ensure your rights are protected.

## How we use your information

The information that we collect and store relating to the use of this website is exclusively used to enable us to provide our services to you. We do not reveal this information to third parties.

We only ever use your personal data with your consent, or to the extent necessary to:

- process a donation that you have made
- carry out our obligations arising from any contracts entered into by you and us
- seek your views or comments on the services we provide
- notify you of changes to our services
- send you communication(s) which you have requested and that may be of interest to you
- process a job application
- process an application for support that you have requested from the service(s) we provide
- process payments for work undertaken by you as a supplier or an employee
- protect the vulnerable adults and children we support
- ensure that the information we hold about you is kept up-to-date.

We review our retention periods for personal information on a regular basis. Further details are outlined in our Record Retention Policy, which includes details of how long information is kept for. We are legally required to hold some types of information to fulfil our statutory obligations (e.g. the collection of Gift Aid).

## Who has access to your information?

We will not sell or rent your information to third parties and will not share your information with third parties for marketing purposes.

**Third-party product providers we work in association with:** When you are using our secure online donation pages, your donation is processed by a third-party payment processor, who specialises in the secure online capture and processing of credit/debit card transactions. If you have any questions regarding secure transactions, please contact us.

As part of contractual funding requirements in our services, we update a third-party data monitoring report system when you apply for support from us. The relevant third-party product provider will use your details to monitor service provision, ensuring that we carry out our obligations arising from the contract that we have entered into with them to provide support to people in need. In this case, they will be acting as a data controller of

your information and therefore we advise you to read their Privacy Policy (Mainstay & the Local Authority). These third-party product providers will share your information with us which we will use in accordance with this Privacy Policy.

**Third-Party Service Providers working on our behalf:** We may pass your information to our third-party service providers, agents / subcontractors and other associated organisations for the purposes of completing tasks and providing services to you on our behalf (for example to process donations, for monitoring rent and licence fee payments, or to carry out repairs in properties that you may be one of our tenant's in or rent from us). However, we will only disclose the personal information that is necessary for them to deliver the service. We have a contract in place with them that requires them to keep your information secure and not to use it for their own direct marketing purposes.

We may transfer your personal information to a third party as part of a sale of some or all of our business and assets to any third-party or as part of any business restructuring or reorganisation, or if we are under a duty to disclose or share your personal data in order to comply with any legal obligation or to enforce or apply our terms of use or to protect the rights, property or safety of our supporters and customers. However, we will take steps with the aim of ensuring that your privacy rights continue to be protected.

## **Links to other websites**

We may include links on our website to other websites which we do not control or manage. We do not accept any responsibility for how these websites use your information and would encourage you to check their own privacy policies.

## **How you can access and update your information**

The accuracy of your information is important to us, ensuring that any personal information that we hold about you is correct and up to date. You may ask us to correct or remove information that you think is inaccurate. Please use the contact details which are noted at the end of this Privacy Notice.

You have the right to ask for a copy of the information that SHAP Ltd hold about you. We will provide you, at no charge, with a hard copy of all the personal data that we have regarding you; although we shall require proof of your identity.

## **Consent**

By consenting to this privacy notice, you are giving us permission to process your personal data specifically for the purposes identified. Consent is required for SHAP to process your personal data, but it must be explicitly given. Where we are asking you for sensitive personal data, we will always tell you why and how the information will be used. You may withdraw your consent at any time by writing to us using the contact details noted at the end of this Privacy Notice.

## **16-year old's and under**

We are concerned to protect the privacy of children. In line with Data Protection Act 2018, parental consent will be required to process the data of under 13-year olds. If you are aged 13 or over, we need your consent to share your personal information, as under the Data Protection Act 2018, age 13 is classed as being an adult for information sharing purposes.

## **Electronic access systems**

In some of our services, we use a biometric fingerprint system to enhance security in the services. We need your consent to hold this electronic information. If you are aged 12 or under, we need your parent/ guardian's consent to hold this data, but if you are aged 13 or over, we need your consent.

## **Cookies**

Our website uses cookies (copy of our Cookie Policy can be accessed on our website at: [www.shap.org.uk](http://www.shap.org.uk)). Cookies help us provide you with a better website, by enabling us to monitor which pages you find useful and which you do not.

A cookie is a small file which asks permission to be placed on your computer's hard drive. Once you agree, the file is added and the cookie helps analyse web traffic or lets you know when you visit a particular site. There are two main kinds of cookies: "session" cookies and "persistent" cookies. Session cookies only last while you are online and are deleted when you close your internet browser. Persistent cookies outlast user sessions and remain stored on your computer until you delete them or until they reach their expiry date. We use Google Analytics to analyse the use of our website. It uses cookies to generate statistical and other information to create reports about the use of our website. Google then stores this information.

Cookies do not contain any information that personally identifies you and a cookie in no way gives us access to your computer or any information about you. Most browsers allow you to manage cookies and disable them if you want (visit [www.aboutcookies.org](http://www.aboutcookies.org) or

[www.allaboutcookies.org](http://www.allaboutcookies.org)). However, in a few cases some of our website features may not function as a result.

## **Where your information is processed**

As part of the services offered to you through our website, the information you provide is processed in the UK. However, there may be occasions when it may be transferred to countries outside of the EU if any of our computer servers are from time to time located in a country outside of the EU. If this does happen, we do take steps to ensure that the appropriate security measures are taken to protect your personal information and to ensure that your privacy rights continue to be protected as outlined in this privacy notice.

## **Personal information security**

We take information security very seriously and we strive to comply with our obligations at all times. When you give us personal information, we take steps to ensure that it is treated securely. Any sensitive information (such as credit or debit card details) is encrypted and protected using security encrypted software. We take the appropriate technical and organisational measures to prevent unauthorised or unlawful processing of personal data and against accidental loss/destruction of/damage to it.

## **If you wish to change how we contact you**

You can stop receiving information from us at any time. To do this, you can write to us or send an email to the addresses shown at the end of the Privacy Notice. We aim to fulfil all requests to stop sending information within 10 working days of receiving it.

## **If you want to complain about how we collect, store or use your data**

SHAP tries to meet the highest standards when collecting and using personal information. For this reason, we take any complaints we receive about this very seriously. We encourage people to bring it to our attention if they think that our collection or use of information is unfair, misleading or inappropriate. We would also welcome any suggestions for improving our procedures.

You can contact us if you have any concerns or complaints about how we have collected, used or stored your personal information. You can write to us using the contact details shown below (how to contact us).

Alternatively, you can contact our Data Protection Supervisory Authority at: Information Governance Department, Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF, or telephone: 0303 1231113, or by email: [www.ico.org.uk](http://www.ico.org.uk)

## **How to contact us**

Contact our Data Protection Officer if you have any questions about our privacy policy or information we hold about you:

- By email: [cbu@shap.org.uk](mailto:cbu@shap.org.uk)
- Or write to us at: SHAP Ltd, Bearly House, 67 Liverpool Road, St Helens WA10 1PQ