

## Appendix to GDPR Policy document for all staff, fundraisers, volunteers and clients of Aurora Wellbeing Centres

### Legal basis for processing Data

#### CONSENT

In order to comply with the new General Data Protection Regulations which comes into force on 25th May 2018, we now need the consent for all our administrative and therapy functions including staff, volunteers and clients and how we communicate, collect and hold their personal data.

If you are not happy with any aspect of how we collect and use your data, you have the right to complain to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues ([www.ico.org.uk](http://www.ico.org.uk)). We would be grateful if you could contact us first if you have a complaint so that we can try to resolve it for you. Aurora is registered with the ICO and registration is up to date for the year 2018 – 19. This registration is renewed annually.

#### WHAT INFORMATION DOES Aurora Wellbeing Centres COLLECT ABOUT YOU

Personal data means any information capable of identifying an individual. It does not include anonymised data.

We may process certain types of personal data about you as follows:

- **Identity Data** may include your first name, maiden name, last name, date of birth and gender.
- **Contact Data** may include your home address, email address and telephone numbers.
- **Data for Fundraising activities** may include your preferences in our newsletters or any information regarding a fundraising activity from us and your communication preferences.
- **Financial Data** may include your bank account details for paying staff wages.
- **Transaction Data** may include details about payments between us and other details of purchases made by us, Aurora Wellbeing Centres.

#### HOW Aurora Wellbeing Centres COLLECTS YOUR PERSONAL DATA

We collect data about you through a variety of different methods including:

**Direct interactions:** You may provide data by filling in forms on our website (or otherwise) or by communicating with us by post, phone, email or otherwise, including when you:

- Become an employee;
- Request information about our services;

- Come onboard as a client of our services;
- Subscribe to our services or newsletter publications;
- Request resources to be sent to you;
- Give us your feedback about our services

### HOW Aurora Wellbeing Centres will USE YOUR PERSONAL DATA

We will only use your personal data when legally permitted. The most common uses of your personal data are:

- Where we need to perform the contract between us.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- Where we need to comply with a legal or regulatory obligation.

Generally, we do not rely on consent as a legal ground for processing your personal data, other than in relation to sending you newsletters and details regarding fundraising activities by communicating to you via email or by post. You have the right to withdraw your consent to our contacting you at any time by emailing us at [admin@aurorawellbeing.org.uk](mailto:admin@aurorawellbeing.org.uk)

### WHY Aurora Wellbeing Centres PROCESSES PERSONAL DATA

We intend to use your personal data for our administrative and Therapy functions for which we will process such data. We may process your personal data for more than one area, depending on the specific purpose for which we are using your data.

Please email us at [admin@aurorawellbeing.org.uk](mailto:admin@aurorawellbeing.org.uk) if you need details about the specific reasons.

To register you as a new employee, volunteer and clients

To process and deliver our service including:

(a) Manage payments and wages (to paid employees only)

To manage our relationship with you which will include:

(a) Notifying you about fundraising events and activities

(b) Asking you to complete a feedback form and return it to us.

To manage a legitimate interest while in the recruitment process for job applicants and new employees.

To administer and protect our charity and our site (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)

To deliver relevant content and advertisements to you and measure and understand the effectiveness of our promotion of our charitable activities.

To use data analytics to improve our website, products/services, marketing, customer relationships and experiences

To make suggestions and recommendations to you about services that may be of interest to you

### Marketing communications

You will receive marketing communications from us if you have:

- requested information from us or purchased goods or services from us; or
- if you provided us with your details and ticked the box at the point of entry of your details for us to send you fundraising communications; and
- in each case, you have not opted out of receiving that information.

We will get your express opt-in consent form before we share your personal data with any third party for marketing purposes.

You can ask us or third parties to stop sending you marketing messages at any time by clicking on one of the unsubscribe buttons that are on all of our marketing emails OR by emailing us at [admin@aurorawellbeing.org.uk](mailto:admin@aurorawellbeing.org.uk) at any time.

Where you opt out of receiving our fundraising communications, this will not apply to personal data provided to us as a result of a product/service purchase, warranty registration, product/service experience or other transactions.

### Change of purpose

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If we need to use your personal data for a purpose unrelated to the purpose for which we collected the data, we will notify you and we will explain the legal ground of processing.

We may process your personal data without your knowledge or consent where this is required or permitted by law.

### DISCLOSURES OF YOUR PERSONAL DATA TO OTHERS (staff only)

Your data may be shared internally, we may have to share your personal data with the parties set out below:

HM Revenue & Customs – Government

CAPlus Accounting Service

Macmillan

## DATA RETENTION

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

By law we have to keep basic information about our staff, volunteers, customers and suppliers (including Contact, Identity, Financial and Transaction Data) for six years after they cease being staff, volunteers, customers and suppliers for tax purposes.

In some circumstances you can ask us to delete your data: see below for further information.

In some circumstances we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

## YOUR LEGAL RIGHTS

As a data subject, you have a number of rights. You can:

- access and obtain a copy of your data on request;
- require us to change incorrect or incomplete data;
- require us to delete or stop processing your data, for example where the data is no longer necessary for the purposes of processing; and
- object to the processing of your data where we are relying on our legitimate interests as the legal ground for processing.

If you would like to exercise any of these rights, please email [admin@aurorawellbeing.org.uk](mailto:admin@aurorawellbeing.org.uk). If you believe that we have not complied with your data protection rights, you can complain to the Information Commissioner. More information is available at <https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/>

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.