



SAINT JOHN OF GOD HOSPITALLER SERVICES

WEBSITE PRIVACY NOTICE ("NOTICE")

SUMMARY OF THE NOTICE

- A. The Notice on the next page applies to all persons who use our website.
- B. We are committed to ensuring that any personal information that we receive or collect about you is used fairly and lawfully by us, is safeguarded by us, and is only processed by us in accordance with relevant data protection law.
- C. The purpose of the Notice is to ensure that we are transparent and upfront with you about what personal information we hold about you and what we do with that information.
- D. The Notice on the following pages therefore covers the following questions:
 - 1. Who does this Notice apply to? (Page 2)
 - 2. What is the purpose of this Notice? (Page 2)
 - 3. What personal information may we hold about you? (Pages 2-3)
 - 4. How is your personal information collected? (Page 3)
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- E. If you have any questions about the Notice then please contact our Data Protection Officer, Dr Jamie Mackrill on 01325 373700 or you can email us at DPO@sjog.org.uk.

1. WHO DOES THIS NOTICE APPLY TO?

1.1 This Notice applies to you, as a user of our website.

1.2 In this Notice references to:

1.2.1 **we, us or our** means **Saint John of God Hospitaller Services** (company number 05324279 and charity number 1108428) with its registered address at Suite 1-3 Yarn, Lingfield House, Lingfield Point, Darlington, Co Durham, DL1 1RW;

1.2.2 **personal information** is information that is about you and which identifies you; and

1.2.3 **processing** (and **processed** and **process**) includes collecting, recording, altering, retrieving, storing, using, disclosing or destroying.

2. WHAT IS THE PURPOSE OF THIS NOTICE?

2.1 We are committed to ensuring that your privacy is protected and that we comply with all applicable data protection laws (including the General Data Protection Regulation, which is otherwise known as "the GDPR") as controller of your personal information and when processing your personal information.

2.2 The purpose of this Notice is therefore to explain, for example:

2.2.1 **what** personal information we collect about you;

2.2.2 how we will **use** and **share** your personal information;

2.2.3 how long we will **keep** your personal information;

2.2.4 the **rights** that you have in relation to your personal information; and

2.2.5 how you can **contact us** about this Notice.

3. WHAT PERSONAL INFORMATION MAY WE HOLD ABOUT YOU?

3.1 We will only collect, use and retain personal information about you that we believe we require.

3.2 We will not collect, use or retain personal information about you "just for the sake of it".

3.3 We may process different kinds of personal information about you which we have collected from our website and which we have grouped together as follows:

3.3.1 **Identity Data** includes first name, maiden name, last name, username or similar identifier, marital status, title, date of birth and gender.

3.3.2 **Contact Data** includes home address and e-mail address.

3.3.3 **Financial Data** includes bank account and payment card details.

3.3.4 **Transaction Data** includes details about payments from you and other details of services you have purchased from us.

3.3.5 **Technical Data** includes internet protocol (IP) address, domain name, operating system, your login data, browser type and version, time zone settings and location, browser plug-in types and versions, operating system and platform, and other technology on the devices you use to access this website.

3.3.6 **Profile Data** includes your username, password and your feedback.

3.3.7 **Usage Data** includes information about how you use our website, the website that referred you to us, the files you download, the pages viewed and the times and dates of these visits.

3.4 We do not collect any **special categories of personal information** about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinion and information about your health) or any information about criminal convictions and offences through our website, unless you provide that information to us. We ask that you do not provide us with any special categories of personal data via our website unless you consider it necessary to do so.

3.5 **If you fail to provide personal information**

Where we need to collect personal information by law, or under the terms of a contract we have with you, and you fail to provide that information when requested, we may not be able to perform the contract we have or are trying to enter into with you. In this case, we may have to cancel a service you have with us but we will notify you if this is the case at the time. If you are a user of our services please refer to our service user privacy notice to find out more about how we use your data.

4. **HOW IS YOUR PERSONAL INFORMATION COLLECTED?**

4.1 We use different methods to collect personal information from and about you including through:

4.1.1 **Direct interactions.** You may give us your personal information when, for example:

- (a) sending us an e-mail via the "Contact Us" section of our website;
- (b) enquire or apply for our services;
- (c) create an account on our website in order to apply for a job vacancy; or
- (d) give us feedback or contact us.

4.1.2 **Automated technologies or interactions.** As you interact with our website, we will automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, server logs and other similar technologies. We may also receive Technical Data about you if you visit other websites employing our cookies. Please see our cookie notice for further details.

4.1.3 **Third party or publicly available sources.** We will receive personal data about you from various third parties as set out below:

- (a) Technical data from the following parties:
 - (i) analytics providers such as Google based outside the EU;
 - (ii) [any others such as search information providers?]
- (b) Contract, Financial and Transaction Data from providers of technical, payment and delivery services such as Just Giving based inside the EU.

5. **HOW DO WE USE AND SHARE YOUR PERSONAL INFORMATION?**

5.1 We process personal data to enable us to further our charitable objects which are broadly:

5.1.1 The relief of poverty, sickness, old age, distress and disabled persons; and

5.1.2 To further the charitable purposes for the time being of Hospitaller Order of Saint John of God Charitable Trust.

5.2 Your personal information may be used by us (including our staff), and disclosed to third parties (including the third parties from whom we receive your personal information). For each of the purposes we have set out the legal basis on which we use and share your personal information in the table below.

Purpose for Processing Your Personal Information	Type of Personal Information	Lawful Basis
To register you as a new service user	(a) Identity (b) Contact	Performance of a contract with you
To process your enquiry into our services: (a) To communicate with you about our services (b) To assess the services which you may require from us	(a) Identity (b) Contact	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to assess the services which you may require from us)
To process your job application	(a) Identity (b) Contact (c) Profile (d) Technical	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to assess your skills, qualifications, and suitability for the role/work that you have applied for) (c) Necessary to comply with a legal obligation (to keep records related to our recruitment process and to comply with our legal and/or regulatory obligations)
To manage our relationship with you which will include: (a) Notifying you about changes to our terms or privacy policy (b) Asking you to leave a review or take a survey	(a) Identity (b) Contact (c) Profile	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to keep our records updated and to study how people use our services) (c) Necessary to comply with a legal obligation
To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	(a) Identity (b) Contact (c) Technical	(a) Necessary for our legitimate interests (for running our charitable business, provision of administration and IT services, network security, to prevent fraud) (b) Necessary to comply with a legal obligation
To deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you	(a) Identity (b) Contact (c) Profile (d) Usage (e) Technical	Necessary for our legitimate interests (to study how our service users use our services, to develop them, to grow our charitable business and to inform our marketing strategy)

Purpose for Processing Your Personal Information	Type of Personal Information	Lawful Basis
To use data analytics to improve our website, services, marketing, service user relationships and experiences	(a) Technical (b) Usage	Necessary for our legitimate interests (to define types of users for our services, to keep our website updated and relevant, to develop our charitable business and to inform our marketing strategy)
To make suggestions and recommendations to you about the services that may be of interest to you	(a) Identity (b) Contact (c) Technical (d) Usage (e) Profile	Necessary for our legitimate interests (to develop our services and grow our charitable business)

6. HOW CAN YOU MANAGE COOKIES?

- 6.1 You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly. For more information about the cookies we use, please see our cookies notice.

7. HOW LONG WILL WE KEEP YOUR PERSONAL INFORMATION?

- 7.1 We will keep your personal information for as long as is necessary for the purpose for which we collect it. The exact period will therefore depend on the purpose for which we hold your personal information. For example, where we hold personal information:
- 7.1.1 To comply with a legal or regulatory obligation, we will keep that information for at least as long as is required to comply with that obligation.
 - 7.1.2 To deal with a complaint that you have raised, we will keep the information for a period of seven years following resolution of the complaint in accordance with our complaints procedure or following conclusion of our complaints procedure (whichever is earliest).
 - 7.1.3 To provide services for you, we will keep the information in accordance with the terms of our privacy notice for service users.
 - 7.1.4 To access your application for a job with us, we will hold that information in accordance with our privacy policy or job application.
 - 7.1.5 To help to improve our services, we will hold your personal information for at least as long as required to design, implement and monitor any such improvements.
- 7.2 We may extend the period for which we keep your personal information in the event that legal proceedings are brought in relation to or involving you. In those circumstances we may need to retain some relevant personal information for as long as is necessary for the purposes of such litigation.

8. DO WE SEND YOUR INFORMATION OUTSIDE THE EUROPEAN ECONOMIC AREA ("EEA")?

- 8.1 Some of our external third party providers are based outside the EEA so their processing of your personal data will involve a transfer of data outside the EEA.
- 8.2 Whenever we transfer your personal data out of the EEA, we ensure a similar degree of protection is afforded to it by ensuring appropriate safeguards are in place, for example:

- 8.2.1 We will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data by the European Commission.
- 8.2.2 Where we use providers based in the US (e.g. Google Analytics), we may transfer data to them if they are part of the Privacy Shield which requires them to provide similar protection to personal data shared between Europe and the US.

9. HOW SECURE IS THE PERSONAL INFORMATION THAT WE COLLECT ABOUT YOU?

- 9.1 We have put in place appropriate security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed.
- 9.2 We also limit access to your personal information to those employees, workers, agents, contractors and other third parties who have a business need-to-know. They will only process your personal information on our instructions and will be subject to a duty of confidentiality.
- 9.3 We have processes in place to ensure that any personal information that we keep in hard copy form is stored securely.
- 9.4 Where we keep personal information in soft copy, that is stored either on our secure servers or on secure servers operated by a third party.
- 9.5 Please note that the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal information transmitted via our website, we cannot guarantee the security of your personal information transmitted in this way and any transmission is at your own risk. Once we have received your personal information, we will use strict procedures and security features to try to prevent unauthorised access.
- 9.6 We have put in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator(s) of a suspected breach where we are legally required to do so.

10. WHAT ARE YOUR RIGHTS IN RELATION TO YOUR PERSONAL INFORMATION?

- 10.1 You have certain rights in relation to your personal information. Those apply in certain circumstances and are subject to certain exemptions. In summary, those rights are:

The Rights	Summary of Your Rights
Right of access to your personal information	You have the right to receive a copy of your personal information that we hold about you.
Right to rectify your personal information	You have the right to ask us to correct the personal information that we hold about you where it is incorrect or incomplete. If any of the personal information that we hold about you changes then we encourage you to please let us know as soon as possible so that we can ensure our records about you are accurate and up-to-date.
Right to erasure of your personal information	You have the right to request that we erase all information we hold about you if the information is no longer being used for the purposes you have consented to or if you revoke any consent given to us processing that information.
Right to restrict the use of your personal information	You have the right to request that we suspend our use of your personal information in certain circumstances.
Right to data portability	You have the right to request that we copy or transfer your personal information to another service provider.

The Rights	Summary of Your Rights
Right to object to the use of your personal information	You have the right to object to the use of your personal information.
Right to withdraw consent	You have the right to withdraw your consent at any time where we rely on consent to process your personal information.
Right to complain to the data protection regulator for England and Wales	<p>You have the right to complain to the Information Commissioner's Office (otherwise known as the "ICO") where you think we have not used your personal information in accordance with data protection law.</p> <p>You can contact the ICO on 0303 123 1113 or by visiting their website at www.ico.org.uk.</p> <p>Please note that we are registered with the ICO as a data controller under number Z9607924. It may be useful to quote this number in your correspondence to the ICO.</p>

11. WHAT DO WE DO WITH INFORMATION ABOUT CRIMINAL CONVICTIONS AND OFFENCES?

- 11.1 We do not routinely process personal data relating to criminal convictions and offences.
- 11.2 If and when we do process such data about you, we will only do so where you have provided your consent, or where we consider it necessary to protect your vital interest or where necessary in relation to legal claims. When processing such information we will ensure that appropriate safeguards are in place.

12. WHAT OTHER INFORMATION SHOULD YOU BE AWARE OF?

- 12.1 This website includes links to third party websites, plug-ins and applications including, for example, to the Just Giving UK site, our Facebook page, the websites of certain religious organisations (e.g. Catholic Online) and various care and advice websites (e.g. the CQC, and Carers UK). Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control those third party websites and are not responsible for their privacy statements. When you leave our website, we therefore encourage you to read the privacy policy of every website you visit.

13. WHEN AND HOW CAN WE MAKE CHANGES TO THIS NOTICE?

- 13.1 We may update this Notice at any time. The changes will come into effect once the updated Notice is published on our website.

14. HOW CAN YOU GET IN CONTACT WITH US?

- F. If you have any questions regarding this Notice, or the way we use your personal information, or wish to exercise any of your rights set out in section 10 above then please contact us on 01325 373700 or you can email us at DPO@sjog.org.uk.

This Notice was updated in July 2019