

Privacy Statement

1. Introduction

SocietyLinks Tower Hamlets is committed to protecting and respecting the personal data we hold. This privacy notice explains why and how we collect, use, store, and share personal data, and outlines the rights of individuals under the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018.

SocietyLinks Tower Hamlets is the **Data Controller** for the personal data we process.

Personal data means any information relating to an identified or identifiable living person. We aim to be transparent about how and why we process personal data.

2. The Data We Collect

The data we collect depends on the services we provide. This may include:

2.1 Personal data

- Names, addresses, dates of birth, gender, email addresses, phone numbers
- Emergency contact details
- Information about family members or dependants
- Service usage information
- Photographs or video (e.g., for events or publicity, with consent)

2.2 Special category data

We may also collect more sensitive information, such as:

- Ethnicity
- Religion
- Health information
- Additional needs or disabilities

Your original notice states that you collect “*ethnicity, religion and health information*”, so this section formalises the legal basis for doing so.

2.3 Children’s data

We provide services to children and young people. Where we process children’s data, we take additional steps to protect their privacy, including:

- Collecting only what is necessary
- Using age-appropriate explanations
- Obtaining parental/guardian consent where required

3. How We Collect Data

We collect data:

- Directly from individuals
- From parents/guardians (for children)
- From third parties acting on your behalf
- From publicly available sources (e.g., Companies House)

4. Why We Process Data (Purposes)

We process personal data for the following purposes:

4.1 Service delivery

- Assessing needs
- Managing service user relationships
- Providing support, activities, and programmes

4.2 Administration and operations

- Internal records
- Monitoring and evaluation
- Managing events
- Responding to enquiries
- Safeguarding and risk management

4.3 Legal and regulatory obligations

- Safeguarding
- Health and safety
- Financial reporting
- Compliance with charity and company law

4.4 Employment and volunteering

- Recruitment
- HR administration
- Payroll and training

4.5 Marketing and communications

- Sending updates about our services
- Sharing stories or photos (only with consent)

5. Our Lawful Bases for Processing

Under UK GDPR, we must identify a lawful basis for each type of processing. We rely on the following lawful bases:

5.1 Contract

To deliver services you have registered for.

5.2 Legal obligation

For safeguarding, financial reporting, and compliance with charity law.

5.3 Legitimate interests

To manage our organisation, improve services, and communicate with service users in ways they would reasonably expect.

5.4 Consent

For:

- Marketing communications
- Use of photographs or video
- Collecting optional demographic information

Consent can be withdrawn at any time.

5.5 Vital interests

Where processing is necessary to protect someone's life (e.g., medical emergency).

6. Special Category Data – Article 9 Conditions

Where we process sensitive data such as health, ethnicity, or religion, we rely on:

- **Explicit consent** (Article 9(2)(a))
- **Substantial public interest** (Article 9(2)(g)), including safeguarding
- **Provision of health or social care** (Article 9(2)(h))

This is required by ICO guidance and was missing from your original notice.

7. Who We Share Data With

We only share personal data when legally permitted and when necessary.

We may share data with:

- IT and database providers
- Funders (for monitoring and evaluation)
- Local authorities

- Safeguarding partners
- Auditors and regulators
- Professional advisers (e.g., legal or financial)

All third-party processors are bound by data protection agreements.

8. International Transfers

Your original notice states that “*personal data resides within the UK territory.*”

We confirm that:

- We store personal data within the UK
- If data is ever transferred outside the UK, we will ensure appropriate safeguards (e.g., adequacy decisions or Standard Contractual Clauses)

9. Data Security

We take data security seriously.

Measures include:

- Secure servers
- Access controls
- Staff training
- Policies on confidentiality, data protection, and retention

10. How Long We Keep Data

We retain personal data only as long as necessary for the purpose collected, including:

- Up to 6 years for service records
- Up to 2 years for unsuccessful job applicants
- Longer where required for safeguarding or legal claims

Archived data is stored securely with restricted access.

11. Your Rights

Individuals have the following rights under UK GDPR:

- Right to access
- Right to rectification
- Right to erasure
- Right to restrict processing
- Right to object
- Right to data portability
- Right to withdraw consent
- Right not to be subject to automated decision-making

To exercise these rights, contact: **info@societylinks.org.uk**

12. Complaints

If you have concerns about how we use your data, contact:

Data Protection Officer

SocietyLinks Tower Hamlets 80 John Fisher Street London E1 8JX

Email: info@societylinks.org.uk

You also have the right to complain to the **Information Commissioner’s Office (ICO)**.

13. Changes to This Notice

We may update this notice from time to time. The latest version will always be available on our website.