

LONDON ACES HUB COMMUNITY INTEREST COMPANY

PRIVACY NOTICE

Privacy Notice

The purpose of this Notice is to inform you of why and how we process your personal data.

The London ACEs Hub is making every effort to ensure that your data is processed lawfully, ethically, fairly and transparently, and that it is kept safe and secure. In order to keep you fully informed, we have some specific arrangements in place which we want to tell you about.

Introduction

We are a Community Interest Company (CIC) registered in England and Wales No. 13488145 aiming to promote awareness of ACEs (adverse childhood experiences), trauma-informed care and resilience for the benefit of the diverse communities of Greater London.

To enable us to fulfil our aims and provide you with the best resources, information and/or support possible, we process elements of your personal data if you contact us or join one of our activities.

The purpose of this notice is to inform you what data we process, how we process it and why. Because we process your personal data, we are a Data Controller and so are required to comply with relevant Data Protection law.

The personal data we process

Your personal data means any information relating to you, and by which you can be identified. In order to carry out our aims and assist you, we may process a variety of your personal data, including but not limited to the following:

- Name and date of birth/age,
- Contact information including telephone number, postal and email addresses,
- Your profession or other activities,
- Your opinions and information about activities and services you may be interested in joining or finding out about,
- Information that you may disclose regarding ACEs, trauma, physical and mental health, and resilience,
- Photographs that you have consented to be taken,
- Bank, debit or credit card details in order to pay for activities or make a donation,
- Computer IP address, and
- Any other personal information you may share with us in order to make the best use of the LAH resources and activities, apply for a role as a volunteer, or support, collaborate with and/or join the Network.

How we collect your personal data

We collect your personal data from a variety of sources, including:

- Information provided directly to us by yourself,
- Information that may be shared by others about you for activities, educational or network building purposes,
- Surveys and research governed by ethical protocols which prioritise your interests and seek informed consent wherever possible and appropriate.

How we use your personal data

We only collect and process the minimum amount of personal data that we need to perform the task that we are carrying out. When we record and use your personal information we:

- Only access it when we have a good reason,
- Only share what is necessary and relevant,
- Don't sell it to anyone.

We process your personal data for purposes connected with our aims of promoting awareness of ACEs, trauma-informed care and resilience in Greater London. We process it for more specific reasons, such as:

- Providing you with information you have requested,
- Handling your enquiries,
- Providing access to certain activities or online resources,
- Notifying you of information or services which may be relevant to you,
- If you apply to become a network member or work with us,
- If you offer grants or donations,
- Auditing use of our systems and websites,
- Improving our services by learning from your feedback and suggestions,
- Handling of complaints, concerns or compliments.

The legal basis for processing your personal data

We have no statutory functions for the processing of data you share with us. We therefore ask for your consent to process the personal data if there is a particular need or purpose to it (e.g. if we want to take and use your photograph in our marketing materials, or you wish to subscribe to our newsletter). In these cases, when you give your consent you will be told how your personal data will be processed. You will also be told how you can withdraw that consent and opt out of further processing.

Your rights under Data Protection Regulations

Under the [Data Protection Act](#), you have the right to know if we hold personal data relating to you, and if so what personal data we hold and why. You also have the right (with certain exceptions) to a copy of any personal data that we hold in order that you can be sure that it is accurate and up to date. You can get more information on what personal data we hold about you by contacting the Data Protection Guardians (details shown at the end of this notice).

Sensitive Personal Information

Data Protection Law recognises that some categories of personal information are more sensitive. Sensitive Personal Information can include information about a person's health, race, ethnic origin, political opinions, sex life, sexual orientation or religious beliefs. If you provide us with any Sensitive Personal Information by telephone, email or by other means, we will treat that information with extra care and confidentiality in accordance with this Privacy Notice.

You may decide you want to remain anonymous, if so please let us know and we will record your contact anonymously.

Sharing your personal data with others

We will only share your information:

- For the purposes of dealing with your enquiry, training, and quality monitoring or evaluating the services we provide.
- If we have your consent for specific use of your personal data to map, assess and/or promote awareness of ACEs, trauma-informed care and resilience.
- In exceptional circumstances where we are legally obliged to do so. Examples of this might include anyone reporting potential or actual serious harm or posing a threat to others or children contacting us and sharing serious issues such as physical abuse or exploitation.

We also share your personal data from time to time with third party contractors, who we engage to undertake certain activities for us. We do this because sometimes it is more efficient and cost effective to use a contractor and we have judged it to be ethical and beneficial. When we engage a contractor they become a Data Processor, and they are then bound by the law in the same way that we are and so are subject to strict rules on data processing. They can only process your personal data in the manner that we specifically tell them to and must not share your personal data with anyone else without our express permission, based on your previous consents. Before engaging a contractor we make sure that they have appropriate measures in place to secure your personal data.

Security of your personal data

London ACEs Hub CIC is committed to the principles of self care and mutual care. We recognise that your personal data deserves full respect and so we take its security very seriously.

Personal data access is monitored according to the requirements of the law to ensure that it is being processed ethically and appropriately. We employ robust technical measures to secure your personal data, which includes passworded access restricted to individuals who have a need to process it in line with their tasks and this Privacy Notice.

All members of the London ACEs Hub, and any associates or technical information processors, are bound by explicit agreements which include clear responsibilities in relation to confidentiality.

The Directors of the LAH and its Coordinating Group Members must attend training in what we call Information Governance. Amongst other things, this training stresses the importance of confidentiality and security of your personal data and makes clear that they are personally responsible for the security of any information which they are processing and/or sharing. This training takes place at least once every two years and attendees sign an agreement stating their understanding of and commitment to the LAH mutual care and data protection measures.

All LAH Members, independent of their roles, are required to commit to the Information Governance Policy. Failing to comply with this policy is a breach of our mutual care commitment and of the conditions of the LAH membership.

How long we hold your information for

We keep your personal information only for as long as we need to use it for the purposes set out in this Notice. This may be governed by statutory rules on the retention of records - e.g. financial records, including donation records, will be kept for a minimum of seven years.

Personal information that we no longer need is securely disposed of and/or anonymised so that you can no longer be identified by it.

Analytics

When you visit www.londonaceshub.org we use a third-party service called WIX Analytics to collect standard internet information and details of visitor behaviour patterns. We do this to find out such things as the number of visitors to the various parts of the site. This information is only processed in an anonymous way. We do not make, and do not allow WIX to make, any attempt to find out the identities of those visiting our website. If we do collect personal data through our website, we will be upfront about its purpose. and will ask for consent as required.

How we use website cookies

Cookies are small files, usually letters and numbers, which are downloaded onto your device when you visit a website. They let websites recognise your device so that the sites can work more effectively, and also gather information about how you use the site. A cookie, by itself, can't be used to identify you.

They have a number of uses: to make the website work properly for you, to help you navigate the site and to enable us to monitor how our website is being used.

How to manage cookies

For instructions on how to change or disable your cookie settings, check the links:

Internet Explorer:

<http://windows.microsoft.com/en-gb/internet-explorer/delete-manage-cookies#ie=ie-9>

Firefox:

<http://support.mozilla.org/en-US/kb/enable-and-disable-cookies-website-preferences>

Chrome:

https://support.google.com/chrome/answer/95647?hl=en&ref_topic=14666

Updates to this Privacy Notice

This Notice will be changed from time to time to ensure that we are up to date with LAH developments, confidentiality and safety measures and data protection laws. The latest Privacy Notice will always be available on our website. If you need access to a version that is not electronic, please contact us.

Contact

If you have any queries about this Notice or the processing of your personal data, feel welcome to contact us at contact@londonaceshub.org.

Roger Grimshaw and Tiane Graziottin
(Operational Directors)

Rebecca White
(Network Secretary)

London ACEs Hub Data Protection Guardians