Hidden Treasure Trust customer Privacy Notice

This privacy notice tells you what to expect us to do with your personal information.

- Contact details
- What information we collect, use, and why
- Lawful bases and data protection rights
- Where we get personal information from
- How long we keep information
- Who we share information with
- <u>Sharing information outside the UK</u>
- How to complain

Contact details

Post

The Hideaway, Partington Shopping Centre, Central Road, Partington, MANCHESTER, M31 4EL, GB

Telephone

0161 6600299

Email

info@thehideawaypartington.com

What information we collect, use, and why

We collect or use the following information to **provide services and goods, including delivery and third party referrals**:

- Names and contact details
- Gender
- Addresses
- Date of birth
- Service use history
- Health information (including medical conditions, test results, allergies, medical requirements and medical history)

- Dietary information (including allergies and health conditions)
- Information about care needs (including disabilities, home conditions, dietary requirements and general care provisions)
- Information about work, home and living conditions
- Information about support requirements
- Information about lifestyle, interests or personal history
- Records of meetings and decisions
- Information about income and financial needs for funding or personal budget support
- Payment details (including card or bank information for transfers and direct debits)
- Website user information (including user journeys and cookie tracking)
- Information relating to compliments or complaints

We also collect or use the following information to **provide services and goods**, **including delivery and third party referrals**:

• Racial or ethnic origin

We collect or use the following information to **receive donations or funding and organise fundraising activities**:

- Names and contact details
- Addresses
- Payment or banking details
- Donation history
- Tax payer information (for Gift Aid purposes)

We collect or use the following personal information for the prevention, detection, investigation or prosecution of crimes:

- Video recordings of public areas (including indoor and outdoor spaces)
- Video recordings of private or staff only areas
- Financial transaction information
- Information relating to health and safety

We collect or use the following personal information for **service updates or marketing purposes**:

- Names and contact details
- Addresses
- Marketing preferences
- Purchase history
- Donation history
- Website and app user journey information
- Records of consent, where appropriate

We collect or use the following personal information for **research or archiving purposes**:

- Names and contact details
- Addresses
- Recorded images, such as photos or videos
- Purchase history
- Donation history
- Website and app user journey information
- Records of consent, where appropriate

We collect or use the following personal information to **comply with legal requirements**:

- Name
- Contact information
- Identification documents
- Financial transaction information
- Health and safety information
- Criminal offence data

We collect or use the following personal information for recruitment purposes:

• Contact details (eg name, address, telephone number or personal email address)

- Date of birth
- National Insurance number
- Copies of passports or other photo ID
- Employment history (eg job application, employment references or secondary employment)
- Education history (eg qualifications)
- Right to work information
- Details of any criminal convictions (eg Disclosure Barring Service (DBS), Access NI or Disclosure Scotland checks)
- Security clearance details (eg basic checks and higher security clearance)

We also collect or use the following information for **recruitment purposes**:

- Racial or ethnic origin
- Religious or philosophical beliefs

We collect or use the following personal information for **dealing with queries**, **complaints or claims**:

- Names and contact details
- Address
- Purchase or service history
- Relevant information from previous investigations
- Customer or client accounts and records
- Financial transaction information
- Information relating to health and safety (including incident investigation details and reports and accident book records)
- Correspondence

We also collect or use the following information for **dealing with queries, complaints or claims**:

Lawful bases and data protection rights

Under UK data protection law, we must have a "lawful basis" for collecting and using your personal information. There is a list of possible lawful bases in the UK GDPR. You can find out more about lawful bases on the ICO's website.

Which lawful basis we rely on may affect your data protection rights which are in brief set out below. You can find out more about your data protection rights and the exemptions which may apply on the ICO's website:

- Your right of access You have the right to ask us for copies of your personal information. You can request other information such as details about where we get personal information from and who we share personal information with. There are some exemptions which means you may not receive all the information you ask for. You can read more about this right here.
- Your right to rectification You have the right to ask us to correct or delete personal information you think is inaccurate or incomplete. You can read more about this right here.
- Your right to erasure You have the right to ask us to delete your personal information. You can read more about this right here.
- Your right to restriction of processing You have the right to ask us to limit how we can use your personal information. You can read more about this right here.
- Your right to object to processing You have the right to object to the processing of your personal data. You can read more about this right here.
- Your right to data portability You have the right to ask that we transfer the personal information you gave us to another organisation, or to you. You can read more about this right here.
- Your right to withdraw consent When we use consent as our lawful basis you have the right to withdraw your consent at any time. You can read more about this right here.

If you make a request, we must respond to you without undue delay and in any event within one month.

To make a data protection rights request, please contact us using the contact details at the top of this privacy notice.

Our lawful bases for the collection and use of your data

Our lawful bases for collecting or using personal information to **provide services and** goods, including delivery and third party referrals are:

• Consent - we have permission from you after we gave you all the relevant information. All of your data protection rights may apply, except the right to object. To be clear, you do have the right to withdraw your consent at any time.

• Contract – we have to collect or use the information so we can enter into or carry out a contract with you. All of your data protection rights may apply except the right to object.

Our lawful bases for collecting or using personal information to **receive donations or funding and organise fundraising activities** are:

• Consent - we have permission from you after we gave you all the relevant information. All of your data protection rights may apply, except the right to object. To be clear, you do have the right to withdraw your consent at any time.

Our lawful bases for collecting or using personal information **for the prevention**, **detection**, **investigation or prosecution of crimes** are:

• Legal obligation – we have to collect or use your information so we can comply with the law. All of your data protection rights may apply, except the right to erasure, the right to object and the right to data portability.

Our lawful bases for collecting or using personal information for **service updates or marketing purposes** are:

• Consent - we have permission from you after we gave you all the relevant information. All of your data protection rights may apply, except the right to object. To be clear, you do have the right to withdraw your consent at any time.

Our lawful bases for collecting or using personal information for **research or archiving purposes** are:

• Legal obligation – we have to collect or use your information so we can comply with the law. All of your data protection rights may apply, except the right to erasure, the right to object and the right to data portability.

Our lawful bases for collecting or using personal information to **comply with legal requirements** are:

• Legal obligation – we have to collect or use your information so we can comply with the law. All of your data protection rights may apply, except the right to erasure, the right to object and the right to data portability.

Our lawful bases for collecting or using personal information for **recruitment purposes** are:

• Contract – we have to collect or use the information so we can enter into or carry out a contract with you. All of your data protection rights may apply except the right to object.

Our lawful bases for collecting or using personal information for **dealing with queries**, **complaints or claims** are:

• **Consent** - we have permission from you after we gave you all the relevant information. All of your data protection rights may apply, except the right to object. To be clear, you do have the right to withdraw your consent at any time.

Where we get personal information from

- Directly from you
- CCTV footage or other recordings

How long we keep information: See attached 'Data Retention Schedule'



Who we share information with

Data processors

AirTable https://www.airtable.com/company/subprocessors

This data processor does the following activities for us: Hidden Treasure Trust utilises Airtable. Airtable is a cloud collaboration service, that allows documents and data to be uploaded to its central "cloud" in the US for storage through its software. The documents and data can then be accessed by the providers in the WorkWell programme. Airtable have entered into a Data Processing Adendum with Hidden Treasure. Airtable advise that their Data Processing Adendum "includes standard contractual clauses ("Model Clauses") that are the mechanism for GDPR-compliant data transfer." Please see Airtable's Terms of Service, Master Subscription Agreement and Privacy Policy, Privacy White Paper, and Data Processing Addendum.

Others we share personal information with

- Charities and voluntary organisations
- Organisations we need to share information with for safeguarding reasons
- Legal bodies or authorities
- Local authorities or councils

Sharing information outside the UK

Where necessary, we may transfer personal information outside of the UK. When doing so, we comply with the UK GDPR, making sure appropriate safeguards are in place.

For further information or to obtain a copy of the appropriate safeguard for any of the transfers below, please contact us using the contact information provided above.

Organisation name: AirTable

Category of recipient: Storage provider

Country the personal information is sent to: USA

How the transfer complies with UK data protection law: Airtable have entered into a Data Processing Adendum with Hidden Treasure. Airtable advise that their Data Processing Adendum "includes standard contractual clauses ("Model Clauses") that are the mechanism for GDPR-compliant data transfer."

How to complain

If you have any concerns about our use of your personal data, you can make a complaint to us using the contact details at the top of this privacy notice.

If you remain unhappy with how we've used your data after raising a complaint with us, you can also complain to the ICO.

The ICO's address:

Information Commissioner's Office Wycliffe House Water Lane Wilmslow Cheshire SK9 5AF

Helpline number: 0303 123 1113

Website: https://www.ico.org.uk/make-a-complaint

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30 October 2024