



Old Library Trust

Policy for privacy

April 2021

**Reviewed by Project director George McGowan & staff team
Agreed by the Board – Signed by chairperson Charles O Donnell.**

Policy statement

When we provide our services to you, we will collect personal information about you and we want to be open and transparent with you as to the types of information we collect about you, why we collect it, how we use it and who we may share it with.

The data controller of your personal information is **The Old Library Trust HLC of central drive, Creggan, Derry BT48 9QG, a charity registered with The Charity Commission for Northern Ireland NI40909; Charity No: XR44850 and Company number NI1031060.**

If you have any questions or concerns about our use of your personal information, then please contact our **Data Compliance Officer; Mr George McGowan** using the contact details provided at the bottom of this Notice in the *'How to contact us'* section.

You also have the right to contact the Regulator at the Information Commissioner's Office and these details are also contained in the "Contacting the Regulator" section.

How we collect client information?

We may ask you to provide personal information by filling in hard copy forms and documents or by corresponding with us by phone, letter or during the course of our meetings with you.

What type of personal information will be processed and why?

A full table of the information we hold as a service user is detailed in the table below:

<p>Types of personal information</p> <p><i>Depending upon the project you are registered with there are variations in the personal information we hold, if you wish to have a specific list of personal information held, please see “How to Contact Us” Section</i></p>	<p>Why we collect it</p>
<p>Personal details of parents including your name and date of birth, relationship to child on programme, gender.</p> <p>We may ask for copies of identity documents in which case we may collect details including your place of birth and residential address.</p>	<ul style="list-style-type: none"> • To enable us to register you for our services in accordance with funder requirements. • We will only ever use copies of identity documents for this purpose. • We collect and process this personal information in order to comply with our legal and contractual requirements for the provision of our services.
<p>Your contact details including your name, postal, phone and email address(es) and other personal details about you including your title, employment status, marital status and date of birth.</p>	<ul style="list-style-type: none"> • To contact you in order for us to manage, administer and provide our services to you. • To respond to any correspondence and service-related enquiries you send to us in respect of our services. • To discuss services for which you apply or may be interested in applying for. • To manage any applications, you make for our services. • To communicate any updates to you including any changes to our services, the terms and conditions of any services which we have provided to you, any changes to this Notice and to our websites. • To contact you in order to receive your feedback on our services and to participate in related surveys.
<p>Details of your dependents (name, address and date of birth, gender.</p>	<ul style="list-style-type: none"> • To enable us to provide you with services that you have requested that would involve, or have an impact on, your dependents (who may be adults or minors). Where those dependents are

	adults, please make sure that you have the relevant permission to provide us with their personal information.
Details of contact that we have had with you such as meetings with you, discussions and documentation, recommendations, and referrals.	<ul style="list-style-type: none"> • To allow us to provide a professional service to you and to contact you with information about other services or external agency involvement.
Details of services you have received including referrals, external agency services, resources, home visits, records of attendance, accident and incident forms	<ul style="list-style-type: none"> • We collect and process this information in line with provision of our services and regulatory requirements.
Client experience and other feedback and information you provide to us.	<ul style="list-style-type: none"> • To review your feedback and experience with us so that we can improve our services for you and for others.
Information about complaints and incidents.	
All of the personal information described above.	<ul style="list-style-type: none"> • We may disclose your personal information to third parties where we are required to do so to comply with applicable laws and regulatory requirements including in circumstances where we are required to do so by a court Order, regulatory authority or any other third party with the lawful right to request and receive the personal information we hold about you (including law enforcement agencies and social services). • We may also use your personal information where it is necessary for us to take legal advice in order to establish our legal rights, to bring a claim against you or any related parties or to defend a claim from you or any related parties. • We collect and process this personal information for our legitimate business interests including to carry out our own internal business planning, compliance, training, audit and quality assurance purposes.

Types of special category personal data	Why we collect it
Information about your or your dependent(s) physical or mental health or condition including GP/Dentist details, Health Visitor/other professionals, immunisations, disability or special needs information.	Certain services that you request may require this information. Specifically, in order for us to advise you on and to submit applications for healthcare services, we will need to collect information relating to your physical and mental health in order to provide accurate service delivery. We will usually collect this information in the course of meetings with you, on specific questionnaires or in the process of completing an application form for such services.
Information about your sex life or sexual orientation.	Some service providers for eg; HSCB may ask for this information in the course of your application for their services. We will never ask for this information for our own purposes.
Information about your or your dependent(s) racial/ethnic origin or your religious affiliation where relevant.	Some service providers for eg; HSCB may ask for this information in the course of your application for their services. We will never ask for this information for our own purposes.

Depending upon the types of services you require, some of the information that we may also need to collect information from and about you (and/or your dependent(s)) and which the law considers to be sensitive, such as data about physical or mental health, which we refer to as “**special category personal data**”.

We will only process the special category personal data listed above in the course of our legitimate activities and with your explicit consent. We ask for your specific consent to the processing of this data (at the end of this Notice). You may choose not to provide us with this consent. **However, please note that if you do not provide us with your consent to collect and process the information listed in the table above:**

- **we may not be able to advise you fully in respect of certain services which require this information, in particular those relating to health service delivery.**
- **your application may be rejected by the providers of services which require this information; or**

In some circumstances, we may receive information about you from third parties. In particular, we may receive information about you from Social or Health Care Services. This will help us make the best possible assessment of your situation before we decide whether we can provide you with our services and/or recommend any specific services. It is in our legitimate interests to process your personal information for this purpose. We may also ask you to provide Letters of Authority to allow us to receive information about you from providers.

Who might my personal information be shared with?

We may disclose your personal information to the following categories of recipients:

- **to providers of health and social care services in respect of whom you request** us to submit applications on your behalf and to receive updates from such providers in order for us to provide our services to you throughout the lifetime of our relationship with you.
- to our **suppliers and partners** in order for them to help us provide our services to you, this includes:
 - our **IT systems providers** to assist us with providing you with an efficient, modern, and professional service.
 - our suppliers of **audit and regulatory compliance support services** who may review our records containing your personal information in order to audit and report to us on our compliance with applicable laws and regulatory requirements.
 - our **accountants, solicitors, insurer(s) and health regulators)** and any other provider of professional services to us.
- to any **national and/or international regulatory, enforcement body, government agency or court** where we believe disclosure is necessary

1. as a matter of applicable law or regulation,

2. to exercise, establish or defend our legal rights, or
3. to protect your vital interests of those of any other person; and
4. to any **other person with your consent** to the disclosure or where we are permitted to do so by law.

Our legal basis for processing personal information

Our legal basis for collecting and using your personal information will depend on the personal information concerned and the specific context in which we collect it. In respect of the personal information and the purposes for which we may process your personal information which are set out in this Notice, we have confirmed the legal basis upon which we collect and process your personal information in the 'What type of personal information will be processed and why?' section above.

If we ask you to provide personal information to comply with a legal requirement or to perform a contract with you or with your explicit consent, we will make this clear at the relevant time and advise you whether the provision of your personal information is mandatory or not (as well as of the possible consequences if you do not provide your personal information).

Similarly, if we collect and use your personal information in reliance on our legitimate interests (or those of any third party), we will make clear to you at the relevant time what those legitimate interests are.

If you have questions about or need further information concerning the legal basis on which we collect and use your personal information, please contact us using the contact details provided under the "How to contact us" heading below.

Your data protection rights

You have the following data protection rights:

- If you wish to **access, correct, update or request deletion** of your personal information, you can do so at any time by contacting us using the contact details provided under the "*How to contact us*" heading below;

- In addition, you can **object to processing** of your personal information, ask us to **restrict processing** of your personal information or **request portability** of your personal information. Again, you can exercise these rights by contacting us using the contact details provided under the *“How to contact us”* heading below.
- You have the right to **opt-out of marketing communications** we send you at any time. You can exercise this right by clicking on the *“unsubscribe”* or *“opt-out”* link in the marketing e-mails we send you. To opt-out of other forms of marketing (such as postal marketing or telemarketing), then please contact us using the contact details provided under the *“How to contact us”* heading below.
- Similarly, if we have collected and process your personal information with your consent, then you can **withdraw your consent** at any time. Withdrawing your consent will not affect the lawfulness of any processing we conducted prior to your withdrawal, nor will it affect processing of your personal information conducted in reliance on lawful processing grounds other than consent. For specific information about our processing of your sensitive category personal data with your consent, please see the *“Your consent to us processing your special category personal data”* heading below.
- You have the **right to complain to a data protection authority** about our collection and use of your personal information. For more information, please see *“Contacting the Regulator”* section below.

We respond to all requests we receive from individuals wishing to exercise their data protection rights in accordance with applicable data protection laws

Data retention

We retain personal information we collect from you where we have an ongoing legitimate need to do so, for example:

- to provide you with a service you have requested us to provide,
- to perform our contractual obligations to you.
- to comply with applicable legal or accounting requirements.
- to defend or manage any claims or complaints between us, you and any relevant third party including taking legal advice in respect of such claims in order to establish, exercise or defend our legal rights or such

claims. This would include complaints and claims which you may bring against us, or which are submitted to a court, regulatory authority or ombudsman.

When we have no ongoing legitimate need to process your personal information, we will either delete or anonymise it or, if this is not possible (for example, because your personal information has been stored in backup archives), then we will securely store your personal information and isolate it from any further processing until deletion is possible.

Updates to this Notice

We may change or update this Notice in order to maintain our compliance with applicable law and regulation or following an update to our internal practices. When we update our Notice, we will take appropriate measures to inform you, consistent with the significance of the changes we make.

How to contact us

If you would like to contact us in relation to this Notice or if you have any other questions in respect of our processing of your personal information, please contact our Data Compliance Officer; Mr George McGowan @ OLT HLC, central drive, Creggan, Derry BT48 9QG

Telephone: 02871 373870

Email: george@olt.ie

Contacting the Regulator

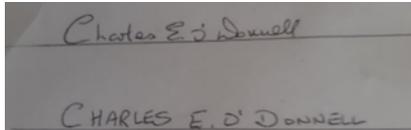
If you feel that your personal data has not been handled correctly, or you are unhappy with our response to any requests you have made to us regarding the use of your personal data, you have the right to lodge a complaint with the Information Commissioner's Office.

You can contact them by telephoning 0303 123 1113.

You can also go online to www.ico.org.uk/concerns. (We are not responsible for the content of external websites).

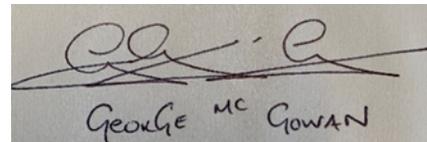
Signed: 01/04/2021 (Digital signature due to Covid restrictions)

Chairperson:



Charles E. J. Donnell
CHARLES E. D'ONNELL

Project director



George Mc Gowan
GEORGE MC GOWAN