



Enriching Lives Everyday

## Chrysalis (Cumbria) Limited Privacy Statement

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## Introduction

We are Chrysalis (Cumbria) Limited, a local registered charity enriching and supporting the lives of individuals with disabilities. This privacy notice is to let you know how we promise to look after your personal data. This notice explains how we do this and tells you about your privacy rights and how the law protects you.

Chrysalis' head office is based at Leaside, Longthwaite Road, Wigton, CA& 9JR. Registered Charity number 116125; Registered Company number 05751140;

You can find out more about us at [www.chrysalis-cumbria.co.uk](http://www.chrysalis-cumbria.co.uk);

If you have any questions or want more details about how we use your personal data, please let us know. See the '[how to contact us](#)' section below for all the different ways you can get in touch.

## What personal information do we collect?

### Communications

What we learn about you from letters, email, and conversations between us and other relevant parties for example referral by a social worker.

## Usage of data

Other data about how you use our products and services

## Documentary data

Details about you that are stored in documents in different formats, or copies of them

## Special types of data

The law and other regulations treat some types of personal data as special. We will only collect and use these types of data if the law allows us to do so:

- Health data and gender – to ensure safe and appropriate support plans for our members (service users) and staff.
- Criminal convictions and offences – to make safer recruitment decisions

## Consents

- Any permissions, consents or preferences that you give us

# What types of personal data do we use?

We use many kinds of personal data, and group them together like this.

Data we collect when you use our products, services and facilities:

- Payment and transaction data
- When you purchase or use our services
- In emails and letters
- In customer surveys
- If you take part in our competitions or promotions
- Information you provide to us by filling in forms on our site
- Through the recruitment process

Data from third parties we work with including:

- Government and law enforcement agencies
- Adult Social Care and Continuing Health Care

# Who do we share your data with?

We may share your personal data with these organisations:

- Regulators e.g. Care Quality Commission (CQC)
- Fraud prevention agencies
- Companies we have a joint venture or agreement to co-operate with
- Companies or organisations you ask us to share your data with

## How do we use your data?

Data Protection law says that we can use personal data only if we have a proper reason to do so. This includes sharing it outside Chrysalis. The law says we must have one or more of these reasons:

- To fulfil a contract we have with you
- When it's our legal duty
- When it's in our legitimate interest
- When you consent to it.

A legitimate interest is when we have a legitimate business or commercial reason to use your information. But even then, it must not unfairly go against what is right and best for you. If we rely on our legitimate interest, we will tell you what that is.

Below is a list of all the ways that we may use your personal data, and which of the reasons we rely on to do so. Our legitimate interests are also below.

### Serving our customers

What we use your personal data for:

- To deliver our products and services
- To manage our relationship with you or your business
- To develop new ways to meet our customers' needs and to grow our business
- To develop and carry out marketing activities
- To study how our customers use our products and services
- To market our products and services

Our reasons:

- Your consent
- Fulfilling contracts
- Our legitimate interests
- Our legal duty

Our legitimate interests:

- Keeping our records up to date
- Working out which of our products and services may interest you and telling you about them
- Developing products and services, and what we charge for them
- Defining types of customers for new products and services
- Seeking your consent when we need it to contact you
- To provide you with information relating to how we can support you
- As an active user of our services to keep you informed about different support options and opportunities
- Being efficient about how we fulfil our legal and contractual duties

## Reducing crime and operating in a safe and lawful manner

What we use your personal data for:

- To detect, investigate, report, and seek to prevent fraud
- To manage risk for us and our customers
- To obey laws and regulations that apply to us
- To respond to complaints and seek to resolve them

Our reasons:

- Fulfilling contracts
- Our legitimate interests
- Our legal duty

Our legitimate interests:

- Developing and improving how we deal with fraud, as well as doing our legal duties in this respect
- Complying with regulations that apply to us
- Being efficient about how we fulfil our legal and contractual duties

## Operating our business effectively

What we use your personal data for:

- To run our business in an efficient and proper way. This includes managing our business capability, financial position, communications, corporate governance, planning, and audit.

Our reasons:

- Our legitimate interests

- Our legal duty

Our legitimate interests:

- Complying with regulations that apply to us
- Being efficient about how we fulfil our legal and contractual duties

## Developing our products and services

What we use your personal data for:

- To develop and manage our brand, products, and services
- To manage how we work with other companies that provide products and services to us and our customers
- To find people who might benefit from using our products and services

Our reasons:

- Fulfilling contracts
- Our legitimate interests
- Our legal duty

Our legitimate interests:

- Developing products and services, and what we charge for them
- Defining types of customers for new products and services
- Being efficient about how we fulfil our legal and contractual duties
- Complying with regulations that apply to us

## What happens if we send your data outside of the EEA?

At present we do not send any of our data outside of the European Economic Area ('EEA') and have no plans to do so.

If we do transfer information outside of the EEA in the future, we will make sure that it is protected in the same way as if it was being used in the EEA. To do this, we will use one or more of these safeguards:

- Only transfer it to a non-EEA country with privacy laws that give the same protection as the EEA, as deemed by the European Commission
- Ensure that a contract with the recipient is in place that means they must protect it to the same standards as the EEA

- Transfer it to organisations that are part of Privacy Shield. This is a framework that sets privacy standards for data sent between the US and EU countries.

You can find out more about these safeguards on the European Commission Justice and Information Commissioner's Office (ICO) websites.

## What happens if you choose not to give us your personal data?

We may need to collect personal data by law, or under the terms of a contract we have with you.

If you choose not to give us this personal data, it may delay or prevent us providing our products or services to you. For example, not providing up to date contact details of next of kin may prevent us from contacting them in an emergency.

## How do we use your data for marketing?

We will send you marketing based on what you tell us about yourself, data we collect when you use our services, and using information from third parties we work with. We use this information to get a view on what we think would interest you the most.

We will only send you marketing messages if we have either your consent or a legitimate interest. This is when we have a legitimate business or commercial reason to use your information that does not unfairly go against what is right and best for you.

You can ask us to stop sending you marketing messages by contacting us at any time by informing us by letter or email.

Whatever you choose for marketing, you'll still receive service messages, such as timetable changes.

## How will we treat children's privacy?

Our products and services do not specifically address anyone under the age of 18. In the case we discover that a child under 16 has provided us with consent for marketing, we will immediately remove this consent. If you are a parent or guardian and you are aware that your child has provided us with personal data, please contact us using one of the methods in the ['how to contact us'](#) section so that we will be able to take the necessary actions.

## How long will we keep your personal data?

We will keep your personal data for as long as you are a customer of Chrysalis. The points below show how long we keep which information, and our reasons why.

What data:

- Personal data including transaction history and complaints

For how long:

- Up to six years after last contact or as dictated by local government bodies we provide care services on behalf of.

Our reasons:

- Keeping our records up to date, working out which of our products and services may interest you and telling you about them
- To respond to any questions, claims or complaints
- Complying with regulations that apply to us
- Being efficient about how we fulfil our legal and contractual duties

For very good reasons, we may keep your data for longer than the periods provided, such as if you were unfortunately involved in a safety incident. If we cannot delete it for legal, regulatory, or technical reasons, we will make sure that your privacy is protected and only use it for those purposes.

## Do you want us to share what personal data we have about you, with you?

If you want us to share what information we have about you, please let us know. See the ['how to contact us'](#) section below for all the different ways you can get in touch.

If you do want to contact us, it would be helpful for us to complete your query if you provide us with your address, contact details and what you would like to have a copy of.

You may be asked to provide proof of identity before we show you your personal data – this helps us prevent unauthorised access.

## Is the personal data we have about you incorrect?

You have the right to question any information we have about you that you think is wrong or incomplete. Please contact us using one of the methods in the ['how to contact us'](#) section or you can update details via your online account.

If you do, we will take reasonable steps to check its accuracy and correct it.

## Do you want us to stop using your personal data?

You have the right to object to certain ways that we use your personal data, or to ask us to delete, remove, or stop using your personal data if there is no need for us to keep it. This is known as the 'right to object' and 'right to erasure', or the 'right to be forgotten'. Please note such requests may not always be possible due to legal obligations we may have to keep such records. For example, ensuring you still have your rights under the Consumer Rights Act.

In some cases, there will be legitimate, legal, or other official reasons for us to keep your data. But please tell us if you think that we should not be using it.

It may be possible for us to restrict the use of your data. This means that it would only be used for certain activities, such as legal claims or to exercise legal rights. If this was to happen, we would not use or share your information in other ways while it is restricted.

You can ask us to restrict the use of your personal data if:

- It is not accurate
- It has been used unlawfully but you don't want us to delete it
- It's not relevant any more, but you want us to keep it for use in legal claims
- You have already asked us to stop using your data but you are waiting for us to tell you if we can keep on using it

If you want to object to how we use your data, ask us to delete it or restrict how we use it, please contact us using one of the methods in the ['how to contact us'](#) section .

In addition, as a care provider, working for local government and/or the NHS, Chrysalis's members or their representatives have the right to opt out of having members' personal data being disclosed for anything other than their care.

The National data opt-out does not currently apply to any personal data which Chrysalis discloses however members must be made aware of this right.

## Do you want to withdraw your consent or object to when we use our legitimate interest for marketing?

You can withdraw your consent or object to marketing at any time. If this is the case, you can do this by:

- Contacting us and informing us by using the 'how to contact us' section

If you withdraw your consent, we may not be able to provide certain products or services to you. If this is so, we will tell you.

## What is a service message?

Services messages are messages we need to send to let you know about your booking, or the service we provide for you. These are different to marketing emails we send as they contain information we need to tell you to ensure we can provide you with our services effectively. Examples of these include:

- Changes to terms and conditions and our privacy notice
- Information about service changes

## Dealing with a request to exercise a right

- All staff and trustees will be trained to recognise when a data subject or their representative wishes to exercise a right verbally or in writing.

Further information and guidance about Privacy Notices under GDPR is available from the Information Commissioner's Office (ICO) at: <https://ico.org.uk/for-organisations/guide-to-data-protection/privacy-notices-transparency-and-control/privacy-notices-under-the-eu-general-data-protection-regulation/>

# How to contact us

If you have any questions or want more details about how we use your personal data, please let us know. We've provided a few different ways for you to do this, so please pick the one you would prefer to use:

Write to us at Chrysalis, Leaside, Longthwaite Road, Wigton, CA& 9JR.;

Email: [info@chrysalis-cumbria.co.uk](mailto:info@chrysalis-cumbria.co.uk)

Tel: 016973 44751.