

## Privacy Policy

Your privacy is important to us and so we are committed to protecting it and only using it in a lawful, fair and transparent way compliant with data protection legislation and for purposes related to activities necessary for Huntingdon Area Money Advice (HAMA) to conduct its activities.

### Data Collection and storage

We collect and store data when you engage with us as a client, creditor, volunteer, paid worker, supporter, supplier of services or someone with whom we believe we have any legitimate reason to be in contact.

We store data, both paper and electronic, in a safe confidential way with access only by HAMA workers and monitoring personnel from our parent organisation Community Money Advice (CMA). The HAMA Centre Manager is the Data Controller.

### Use of Data

We only use data for legitimate HAMA business:

1. To assist clients, contacting them, their representatives and creditors.
2. To contact advisers, supporters and HAMA workers about HAMA business.
3. To contact supporters about HAMA non-confidential activities and sending prayer letters/requests.
4. To contact legitimate agencies in case of concerns brought to our attention.

We will never:

1. Use your data for anything illegal.
2. Use your data for anything which is not relevant to HAMA activities
3. Sell your information to any third party.
4. Use your data for any reason which could be considered unethical, contrary to GDPR, or against the will or best interests of the data subject.

We will:

1. Change your data if it is inaccurate
2. Erase your data if you request it, as long as we do not need to retain it for legal reasons
3. Erase your data when it is no longer required, up to a maximum of 7 years after your last contact with HAMA.

You have the right:

1. To know that we store your data and what data is stored
2. To know how we will use your data
3. To ask to see the data held about you and have a copy (though data relating to other parties and safeguarding may have to be redacted).
4. To ask us to change the data if it is inaccurate
5. To ask us to remove your data, unless we need to retain it for legal reasons.
6. To request portability of your data
7. To make complaints either to Centre Manager or if unresolved to the Information Commissioner's Office (ICO).

To make a complaint write to Centre Manager at HAMA, 83a High Street, Huntingdon, PE29 3DP. Telephone: 01480 418866 or e-mail

[centremanager@huntsmoneyadvice.co.uk](mailto:centremanager@huntsmoneyadvice.co.uk)

Or Information Commissioner's Office <https://ico.org.uk>.

Help line 0303 123 1113

## Use of Clients' Data

As clients of HAMA you have all the rights of privacy as given in our privacy policy. This part of the privacy policy aims to explain further the data we store and how we handle it.

HAMA does not collect or store data in the Special Categories of data defined in GDPR, with the exception of data on health. The Special Categories are:-

- Racial and ethnic origin
- Political opinions
- Religious or philosophical beliefs
- Trade Union membership
- Data on health, sex life or sexual orientation
- Genetic or biometric data

Where data on health is relevant to your case, this may only be collected and stored with your explicit consent.

HAMA need to have information on your partners past and present, children living with you and any dependant adults as this will have a bearing on your benefit claims, amount of earnings you can keep etc.

HAMA will have to keep data on your accommodation, past and present, and any lodgers or persons with you who contribute to your finances.

HAMA will have to keep copies of all relevant documents relating to your finances such as bank statements, court orders and creditor letters to ensure we represent your interests correctly when preparing debt advice.

HAMA will have to keep all relevant documents and data for 7 years in case there is a dispute over benefit payments etc.

HAMA will have to disclose your personal data when contacting creditors on your behalf and you may find that this affects your credit rating.

HAMA may contact the courts disclosing your data if you are preparing a Debt Relief Order (DRO), a bankruptcy application, opposing a bailiff's order or for other legal requirements.

HAMA will not be held responsible if you give inaccurate or false information. If you do so for personal gain this amounts to fraud and you may be prosecuted.

HAMA will cease to help you if you ask us to knowingly supply false information to creditors or the courts or if we find you have given us false information.

You have the right to correct any false information we hold.

You have the right to ask us to cease helping and representing you and in these circumstances we will cease our contact with creditors and courts on your behalf and store all relevant data securely for up to 7 years.

As per the Complaints Procedure you have the right to complain about any part of HAMA's service or data storage, initially to the Centre Manager or one of the Trustees. In case of non-resolution of a complaint regarding data storage you may contact the ICO help line who will advise you further. All contact details are in the privacy policy and the Complaints Procedure.

Approved by Trustees 12<sup>th</sup> June 2018