

GENERAL PRIVACY NOTICE

About us

Huntingdon Area Money Advice (HAMA) is a confidential, free, face-to-face debt advice centre working in association with Community Money Advice (CMA). HAMA is authorised and regulated by the Financial Conduct Authority (FCA). HAMA is committed to protecting and respecting your privacy and complies with the requirements of the General Data Protection Regulation (GDPR).

This Privacy Notice explains how we collect, use and store your personal data. It sets out the basis on which any personal information provided will be processed.

The person responsible for Data Control within HAMA is:

John Pickersgill (Centre Manager)

e-mail: centremanager@huntsmoneyadvice.co.uk

phone: 07541 405299

What is personal data?

Personal data is defined as any information relating to an identified or identifiable natural person (the 'data subject'). The processing of personal data is governed by the GDPR.

The lawful basis for processing your personal data

All organisations need a lawful basis to collect and use personal data. In accordance with GDPR, we can legally collect, process and store your personal information because once you have contacted us for advice, we have a 'legitimate interest' to do so in order to provide you with that advice. Any health information is only stored when you have given us your specific consent to do so. We can act on your behalf in contacting third parties, sharing your personal information when we believe it is in your best interests, because you have given us your consent to collect, process and store your personal data by signing a contract (the Client Agreement) with us. You can withdraw this consent at any time.

The main reason we ask for your information is to help solve your problem.

We only access your information for other reasons if we really need to. Data protection law lets us do this as long as we either get your consent or we have a legitimate interest. For example we have a legitimate interest to access your data:

- for training and quality purposes
- to investigate complaints
- to get feedback from you about our services
- to help us improve our services

Processing your personal data

We collect personal data in order to be able to offer the best advice for your circumstances. We will only use any personal information you have chosen to provide to us, for the purpose that you provided it for. We will also sometimes collect additional information from third parties, with your consent, in order to provide the best advice for your circumstances. For example, credit reference agencies, creditors and debt recovery agencies.

We will not use your personal data for any other purpose without your consent or a legitimate interest. We will not disclose your personal data to any third parties without your consent, except where we are required to do so by law. We will never sell or receive payment for licensing or disclosing your personal information.

Statistics gathered to monitor the service for the purposes of identifying any policy issues and to support funding applications will be anonymised to prevent identification of individual users.

Data protection principles

We comply with our obligations under the GDPR by keeping personal data up to date; by storing and destroying it securely; by not collecting or retaining excessive amounts of data; by protecting personal data from loss, misuse, unauthorised access and disclosure and by ensuring that appropriate measures are in place to protect personal data. You can find more information about how we protect and store your personal data in our Security Policy and File Retention and Destruction Policy.

Our purpose for processing your personal data including special category data

In order to comply with the Financial Conduct Authority's Consumer Credit Sourcebook Regulations we are required to obtain all relevant data in order to be able to offer you the best advice based on your circumstances. This may include processing Special Category Data such as health information or other data of a sensitive nature.

We will only collect Special Category Data if there is a clear reason for doing so, such as where we need this information to ensure that we provide appropriate advice or support to you. We will only use sensitive information for the purposes for which it is provided.

Your data rights

Under data protection law, you have rights of which we need to make you aware. The rights available to you depend on our reason for processing your information.

a) Your right of access

You have the right to ask us for copies of your personal information. There are some exemptions, which mean you may not always receive all the information we process. You can read more about this on the ICO website: <https://ico.org.uk/your-data-matters/your-right-of-access/>

b) Your right to get your data corrected

You have the right to ask us to correct any information we hold about you which you think is inaccurate. This is also known as the 'right to rectification.' You also have the right to ask us to complete information you think is incomplete. You can read more about this right here:

<https://ico.org.uk/your-data-matters/your-right-to-get-your-data-corrected/>

c) Your right to erasure

You have the right to ask us to erase your personal information in certain circumstances. This is known as the right to erasure. This is also known as the 'right to be forgotten'. You can read more about this right here: <https://ico.org.uk/your-data-matters/your-right-to-get-your-data-deleted/>

d) Your right to restriction of processing

You have the right to ask us to restrict the processing of your information in certain circumstances. You can read more about this right here: <https://ico.org.uk/your-data-matters/your-right-to-limit-how-organisations-use-your-data/>

e) Your right to object to processing

You have an absolute right to stop the processing of your personal data for direct marketing purposes. However, we may still be able to legitimately continue using your data for other purposes. You can read more about this right here: <https://ico.org.uk/your-data-matters/the-right-to-object-to-the-use-of-your-data/>

f) Your right to data portability

You have the right to ask that we transfer the information you gave us to another organisation, or give it to you. This right only applies to electronically held data that you have provided to us and we are processing with your consent. You can read more about this right here:

<https://ico.org.uk/your-data-matters/your-right-to-data-portability/>

Your right to withdraw consent

Where we are using your personal information based on your consent, you have the right to withdraw that consent at any time by contacting our Data Controller, verbally or in writing.

Your right to complain

You have the right to be confident that we will handle your personal information responsibly and in line with good practice. If you have concerns about the way we are handling your information, please contact our Data Controller (John Pickersgill) in the first instance as we have a dedicated complaints procedure.

If you are unhappy with how your complaint has been handled by us or if we have failed to resolve your information rights concern, you can raise the matter with the Information Commissioner's Office by calling them on 0303 123 1113 or via email <https://ico.org.uk/global/contact-us/email/> or by writing to the ICO, Wycliffe House, Water Lane, Wilmslow, Cheshire. SK9 5AF.

Exercising your rights

You will not have to pay a fee to access your personal information (or to exercise any of the other rights). However, we may charge a reasonable fee if your request for access is considered to be 'manifestly unfounded or excessive'. Alternatively, we may refuse to comply with the request in such circumstances. You will be informed of this in writing, where this is the case. We have one month to respond to your request. In certain circumstances we may need extra time to consider your request and can take up to an extra two months. If we are going to do this, we will let you know within one month that we need more time and why.

Please contact our Data Controller, John Pickersgill, if you wish to make a request to access your personal information held by Huntingdon Area Money Advice.

Retention periods for personal data

We remove personal data from our systems in line with the data retention periods quoted in Appendix 1. The length of time each category of data will be retained will vary on how long we need to process it, the reason it is collected, and in line with any statutory requirements. After this point the data will either be deleted or rendered anonymous.

Sharing your information with third parties

Your personal data will be treated as strictly confidential and will only be shared with HAMA staff/volunteers and members of the Community Money Advice (CMA) team who are responsible for reviewing client files for audit purposes. Your personal data will only be sent to third parties with your consent. The only exception to this is if information is requested for legal reasons. We will never share your information with third parties for the purposes of direct marketing.

Changes to this Privacy Notice

We reserve the right to review the way we process your personal information and will update this Privacy Notice if there are any changes.

WEBSITE PRIVACY NOTICE

HAMA is committed to protecting and respecting the privacy of visitors to our website www.huntsmoneyadvice.co.uk and complies with the requirements of the General Data Protection Regulation ("GDPR"). Our website Privacy Notice tells you about the practices we follow to look after your personal data. It sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us. Please read the notice carefully to understand our views and practices regarding your personal data and how we will treat it.

Information we may collect from you

We may collect and process the following data about you:

- Information that you provide by completing our 'contact us' forms on our website. This includes information provided at the time of requesting information or our services. We may also ask you for information when you provide feedback to us about our site.
- If you contact us, we may keep a record of that correspondence.
- Details of your visits to our site including, but not limited to, traffic data, location data, weblogs and other communication data and the resources that you access.

IP addresses and cookies.

Where we are able to, we may collect information about your computer, including your IP address, operating system and browser type, for system administration purposes and in order to analyse visits made to our site. This is statistical data about our users' browsing actions and patterns, and does not identify any individual.

Cookies

A cookie consists of information sent by a web server to a web browser, and stored by the browser. The information is then sent back to the server each time the browser requests a page from the server. This enables the web server to identify and track the web browser.

We use Google Analytics to analyse the use of this website. Google Analytics generates statistical and other information about website use by means of cookies, which are stored on users' computers. The information generated relating to our website is used to create reports about the use of the website and is processed in a way that does not identify anyone. We do not make, and do not allow Google to make, any attempt to find out the identities of those visiting our website.

Google will store this information. Google's privacy policy is available at:

<https://policies.google.com/privacy>

Most browsers allow you to reject all cookies, whilst some browsers allow you to reject just third party cookies. For example, in Internet Explorer you can refuse all cookies by clicking "Tools", "Internet Options", "Privacy", and selecting "Block all cookies" using the sliding selector. Blocking all

cookies will, however, have a negative impact upon the usability of many websites. For more information please visit <https://allaboutcookies.org>

Security of your personal data

The transmission of information via the internet should not be assumed to be totally secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to our site; any transmission is at your own risk. However, once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

How we use your personal data

We may use information held about you in the following ways;

- To ensure that content from our site is presented in the most effective manner for you and for your computer.
- To provide you with information, products or services that you request from us or which we feel may interest you, where you have consented to be contacted for such purposes.
- To carry out our obligations arising from any contracts entered into between you and us.
- To allow you to participate in interactive features of our service, when you choose to do so.
- To notify you about changes to our service to you.

Links to other websites

Where we provide links to websites of other organisations, in our documents and on our website, this privacy notice does not cover how that organisation processes personal information. We encourage you to read the privacy notices on the other websites you visit.

Disclosure of your personal data

We will not share the personal information we collect via this website with any other organisation unless we have your consent to do so.

Changes to this Privacy Notice

Any changes we may make to our privacy policy in the future will be posted on this page.

Appendix 1. Data retention periods.

Data Retention Periods		
Data	Retention period	Notes
Service user enquiries	12 months	If anyone contacts us to enquire about our service with a view to making an appointment, we will keep their personal data for a maximum of 12 months unless the individual becomes a client. This is to ensure we are able to respond to their enquiry and manage any missed appointments or subsequent actions, and for audit purposes.
Referrals from third parties	12 months	We receive personal information about potential service users from third parties who wish to refer individuals to us for support. We will hold the information we are given for a maximum 12 months unless the individual becomes a client. This is to ensure we are able to respond to their enquiry and manage any missed appointments or subsequent actions, and for audit purposes.
Client records	7 years after case closure.	This is to ensure we can provide further assistance if a client subsequently needs our help again, and for regulatory and audit reasons to ensure that we are able to manage any future complaints or enquiries.
Safeguarding incident records	70 years.	70 years after the last contact with the individual (taken from CofE advice).
Staff and volunteer records	7 years after ceasing working / volunteering.	If someone becomes a member of our team, we will keep their personnel records for a maximum of 7 years after they cease working/volunteering for us in order to comply with employment regulations and for audit purposes.
Supporter/Marketing records	See note	We will keep the contact details of those who have consented to receiving news and updates from us until they tell us that they no longer wish to receive such information.
Recruitment records	12 months	Where you provide personal data and sensitive personal data when applying for a job or volunteering opportunity, such as the information on your CV, we will process, store and disclose this personal data to support the recruitment process. CVs and application details will be stored for a period of 12 months for audit purposes before being deleted, unless the individual becomes an employee /volunteer.

Based on CMA Privacy Notice 09 18

Approved by HAMA Trustees 11th June 2021, further amended July 2021.