

DOCUMENT REFERENCE

DOCUMENT NAME:	CARALINE GDPR POLICY - PRIVACY POLICY - VERSION2.0 - AUG 2021
VERSION:	V2.0
DATE OF VERSION:	AUGUST 2021
AUTHOR:	PAUL COULDREY OF PC IG CONSULTING
APPROVED BY:	BRIAN HOLMES (CARALINE CHAIR OF TRUSTEE'S)

PRIVACY POLICY

Caraline ('we', 'us', or 'our') is a charity that pioneers confidential counselling and support service for people living with an eating disorder. Caraline is committed to protecting and respecting your privacy. This Privacy Policy, together with any other documents referred to on 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 following carefully to understand our practices regarding your personal data and how we will treat it.

ADDRESS: Kline House, 13 George Street West, Luton, LU1 2BJ
WEBSITE: www.caraline.com - Owned and operate by Caraline.

PERSONAL DATA

Under the UK [General Data Protection Regulation \(Regulation \(UK\) 2016/679\)](#) ('UKGDPR') and [Data Protection Act 2018](#) ('the Act'), personal data is defined as 'any information relating to an identified or identifiable natural person ('data subject'), by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person'.

THE DATA CONTROLLER

A data controller is the individual or legal person who controls and is responsible to keep and use personal data in paper or electronic files. Caraline is the data controller as defined by relevant data protection laws and regulation.

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LAWFUL PROCESSING

The lawful bases for processing are set out in Article 6 and Article 9 of the GDPR. The following applies to Caraline's whenever personal data is to be processed:

Article 6 – Lawfulness of processing

- a) Consent: you have given Caraline your freely, specific, informed or unambiguous consent for your personal data to be processed for a specific purpose.

Article 9 - Processing of special categories of personal data

Processing of personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, and the processing of genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning a natural person's sex life or sexual orientation shall be prohibited.

The above paragraph shall not apply if one of the following applies:

- a) The data subject has given explicit consent to the processing of those personal data for one or more specified purposes.

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DATA RIGHTS

Your data subject rights are listed below:

- The right of access.
- The right to rectification.
- The right to erasure or right to be forgotten.
- The right to restriction of processing.
- The right to be informed.
- The right to data portability.
- The right to object.
- The right not to be subject to a decision based solely on automated processing.
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Under the GDPR and the Act, you may ask for a copy of the information we hold about you and you may request rectifications be made to this information if it is inaccurate or not up to date. Please write to us at admin@caraline.com.

HOW WE COLLECT YOUR PERSONAL DATA

We collect information about you in a few ways:

1. Information that you provide to us directly via the website or over the phone when you wish to benefit from our services;
2. Information that we receive about you from your General Practitioner if she/he refers you to us;
3. Information that we receive about you from CAMHS and CEDS
4. Aggregated information which Virgin Money Giving provides to us when you make a donation via the 'Donate' section of our website (for more information please refer to our Donate Privacy Statement; and
5. Information that you provide to us when you apply for one of our vacancies.
6. We also collect information when you visit our website, namely your IP address, the pages you had previously visited or when you use our services, including usage, log and cookies information or similar technologies. For more information please refer to our Cookie Policy.

PERSONAL DATA WE COLLECT

We may collect the following classes of information:

- Name(s) and address(es), email and phone number(s), age group, gender, sexuality, ethnicity, religion, profession and sector.
- Special categories data including dietary habits and health information
- Staff details relevant to their employment status with us
- Records of donations
- Records of volunteering
- Photographs, recordings (audio and video) during our events
- Information about our relationship with you, correspondence, meeting notes, attendance at events etc.
- Financial information (e.g. Bank details) where they may be relevant to our needs.

If you wish to understand more about our data collection, please write to us at GDPR@caraline.com.

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HOW WE USE YOUR PERSONAL DATA

We will process any of your personal data, in accordance with our obligations under the Act and the GDPR, for the following reasons:

- to provide you with the services you have requested
- to comply with the Act and the GDPR
- for administrative purposes
- to provide you with information about us and our services

If, at any time, you do not wish to receive further information about us and our services, contact us at GDPR@caraline.com.

SHARING YOUR PERSONAL DATA

We may disclose your personal information to third parties if we are under a duty to disclose or share your personal data in order to comply with any legal obligation, or in order to enforce or apply any agreements, or to protect the rights, property, or safety of the organisation, or other individuals. This includes exchanging information with other companies and organisations for the purposes of safeguarding or other statutory regulations we have to comply with as well as those organisations with whom you and we have reciprocal agreements for providing services for education or professional development.

THIRD PARTY WEBSITES

Our site may, from time to time, contain links to and from the websites of our partner networks, advertisers and affiliates. If you follow a link to any of these websites, please note that these websites have their own Privacy Policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to these websites.

PROTECTING YOUR PERSONAL DATA

The data that we collect from you will be processed at our servers in the UK and stored across Microsoft's environment. It may also be processed by organisations operating in the EEA that Caraline has instructed. If personal data is transferred outside the UK or EEA to a country without a designated adequacy rating, Caraline will request the data subject's consent before processing the data. Consent will not be sought where the processor's Binding Corporate Rules, Standard Contractual Clauses or adhoc contractual clauses stipulate that the data will be processed in accordance with the GDPR.

SECURITY OF YOUR INFORMATION

To help protect the privacy of data and personally identifiable information you transmit through use of this our website, we maintain physical, technical and administrative safeguards. We update and test our security technology on an ongoing basis. We restrict access to your personal data to those employees who need to know that information to provide benefits or services to you. In addition, we train our employees about the importance of confidentiality and maintaining the privacy and security of your information. We commit to taking appropriate disciplinary measures to enforce our employees' privacy responsibilities.

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HOW LONG WE STORE YOUR PERSONAL DATA FOR

We store your personal data in accordance with our Data Retention Policy. This policy is reviewed and updated internally to ensure we do not store your data for longer than is necessary. We also review how and where we store any data to ensure that we meet our obligation to store data securely.

In addition, some of the data we hold may be subject to certain legal and regulatory obligations, which provide a minimum retention period for different types of data. The retention period varies depending on the data we hold.

CHANGES TO THIS PRIVACY POLICY

This privacy policy was last updated on 17 August 2021. Caraline reserves the right to vary this Privacy Policy from time to time. Such variations become effective on posting on this website. Your subsequent use of this website or submission of personal information to Caraline will be deemed to signify your acceptance to the variations.

COMPLAINTS

For further information on your rights and how to complain to the ICO, please refer to the ICO website <https://ico.org.uk/concerns>

Contact details

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF
Tel: 0303 123 1113 (local rate)

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