

HOPE worldwide Client Privacy Notice

The aim of this document is to provide you with all the information you need to understand how HOPE *worldwide* handles your personal information so that you can feel comfortable sharing it with us.

Brief Summary:

- We use and collect personal information about you so that we can give you useful advice and help you find suitable housing
- You do not have to give us the information we ask for, but this may mean that we give you
 the wrong advice or may limit what we can do to help you
- Your information is confidential. We will only ever share information about you with others
 when it is necessary e.g. giving a landlord your phone number so that they can contact you
 about viewing a property, in correspondence with the agency who referred you, or if we
 have serious concerns about your safety and wellbeing
- We will keep personal information for up to seven years after you use our service, in case you need our support again

See below for more information about how we use your personal information and your rights – ask a member of staff or email privacy@hopeworldwide.org.uk if you have any questions.

Full Document

In this document 'we' and 'our' refers to HOPE worldwide, whose registered office is at 360, City Road, London, EC1V 2PY.

1. Why do we collect personal information about you?

The main reason why we collect personal information about you is so that we can provide appropriate advice and support to help you find suitable housing e.g. by offering you viewings for a suitable property or referring you to an appropriate housing provider.

We also use information about you for other reasons, which include:

- To keep you, ourselves and others safe
- To keep track of the work we do and to report outcomes to referring organisations and funders
- To keep copies of important documents (e.g. your passport) safe on your behalf
- To publicise our work to the general public and our supporters (with your consent)



Your information may also be used to help monitor the quality of the services we provide. This will help us better understand the needs of the people we see, which helps us improve and develop our services. If used in this way, any information that can identify you will be removed.

2. Where do we get the information from?

We get the information from the organisation that referred you to our service or from you directly.

3. What kind of information we may need

It depends on your situation and what we can offer you. At different times we may record and use any of the following to help us support you to improve your housing situation:

- Contact details (your name, telephone number, email address, next of kin)
- Basic details (e.g. date of birth, gender, nationality, immigration status)
- Housing history
- Contact with other organisations
- Income
- Employment history
- Support needs
- Record of our meetings
- Outcomes
- Information that relates to your safety or safety of others

We also may collect and use the following **special categories** of your personal information:

- Data about your ethnicity, sexuality and religious beliefs
- Data about your health, including any medical conditions
- Data about criminal convictions, offences and legal claims against you, or any related security measures

You do not have to give us the information we ask for, but this may mean that we give you the wrong advice or limit what we can do for you.

4. When do we share information with others?

Your information is confidential. We will only ever share information about you with others when it is necessary, on a need-to-know basis.

If we wish to share any information with other organisations, we will be specific as to what information is being shared, with whom and for what purpose so you can make an informed decision. For example, we may ask you if we can give a letting agent or landlord your name and phone number so that they can contact you regarding viewing a particular property. We may also ask you if you would like us to make an application to a housing provider or grant provider on your behalf. You can withdraw your consent at any time.



Where it's necessary, we may share information about you **without your consent**. The most common situations where this happens are:

- We have serious concerns about your safety and wellbeing, or the safety and wellbeing of others
- To protect our staff and property
- We are required to do so by law, e.g. a court orders us to do so
- It's necessary in connection with a legal claim

In future, we may also need to share personal data with other legal entities, on a temporary or permanent basis, for the purposes of a collaboration, reorganisation, change of legal form, dissolution or similar event.

In some circumstances we may anonymise your personal data so that you can't be identified, in which case we may use and share such data without further notice to you.

5. Our lawful basis for using your information

We will only use your personal information when we are satisfied that it is fair and we can do so lawfully. Our lawful bases for processing personal information may sometimes overlap and there may be several grounds which justify how we use it. The lawful bases are as follows:

We have a **legitimate interest**, for example:

- To assess your situation and to provide you with confidential advice
- To make applications, submit forms, obtain documents, buy items on your behalf
- Keep copies of documents on your behalf (for example, correspondence, birth certificate, medical records)
- To coordinate our work with other organisations that support you
- To alert others that we are seriously concerned about you or about other people in relation to you
- To monitor and evaluate our services so that we can constantly improve them
- To carry out any special research projects using data about clients or ex-clients
- To defend legal claims

There is a **substantial public interest** (for example: when we provide confidential advice or support to you; to monitor equality of treatment; to safeguard adults and children at risk, or where we need to share data for the purposes of detecting and preventing unlawful acts)

We will typically ask for your **consent** to pass your information to other organisations, except for the circumstances described in the previous section. We will always ask for your consent if we would like to use information about you for publicity or fundraising purposes.

Less commonly, we may use your personal data where we need to protect your **vital interests**, where we have a **legal obligation** (for example when we are required to do so by a court) or in relation to **legal claims**.

6. How long do we hold your information?



Your personal details, as well as the record of your attendance and any support you have received from us will be held securely on our case management system (In-Form) for **7 years** from the last time we had contact with you, in case you need our support again. We also need it to monitor our work, comply with audits, produce statistics about homelessness, as well as to defend any legal claims.

7. Data transfers

We use third-party IT solutions, Microsoft Office 365 and In-Form (Salesforce) to record and store our clients' personal data. Internal documents and information generated by us are stored in cloud services hosted within the UK or European Economic Area (EEA).

We also use an online referral form hosted by a US data processor called 'FormAssembly' so that organisations can refer people to our service in a secure form without using email. This data is stored in the United States which does not have equivalent data protection laws. However, FormAssembly's robust Information Security procedures and policies are designed to meet the requirements of the GDPR and we have contractual mechanisms in place to ensure data is protected. See Security for Data Collection and Forms | FormAssembly for more information.

7. Your information rights

Under some circumstances, by law you have the right to:

- Request access to your personal data (also known as a "data subject access request"). This enables you to receive a copy of the personal information we hold about you
- Ask us to correct personal data that we hold about you which is incorrect, incomplete or inaccurate
- Ask us to erase your personal data from our files and systems but only where there is no good reason for us continuing to hold it. Please be mindful that we do need to hold on to the record of our work with you for a period of time, so we won't be able to delete everything on request
- Object to us using your personal data for a legitimate interests or for public task. When requesting this, please provide us with as much detail as you can about your reason for the request as we will need to balance your request against our organisational needs
- Ask us to restrict or suspend the use of your personal data, for example if you want to stop us from deleting it
- Ask us to transfer your personal data to another person or organisation

If you want to do any of the above, please contact a member of HOPE worldwide staff or email privacy@hopeworldwide.org.uk.

If you gave us consent to share your information and you are no longer happy with that, you can withdraw your consent at any time. To do it, please contact a member of staff or e-mail privacy@hopeworldwide.org.uk and we will stop sharing it.

You can also make complaint at any time to the <u>Data Commissioner's Office (ICO)</u>, the UK supervisory authority for data protection issues.