

SELCE DATA SECURITY / PROTECTION POLICY 'PRIVATE CLIENTS'

1. Introduction

SELCE needs to collect and use certain types of information about the Individuals or Service Users who come into contact with SELCE in order to participate in our work. This personal information must be collected and dealt with appropriately whether is collected on paper, stored in a computer database, or recorded on other material and there are safeguards to ensure this under the 2018 UK General Data Protection Regulation (GDPR).

2. Dual Data Protection Policies for SELCE

In view of the very distinct groups of contacts that SELCE works with, it has two separate Data Protection Policies, which are identical in their treatment of the law, compliance and procedure, but separate in that the types of data collected from our clients are detailed differently. This document is the 'private clients' data protection policy, for the majority of SELCE's service users who need to provide very high levels of personal data in order to access SELCE's services. The other data protection policy is for public contacts of SELCE's retrofitting and business services, who do not need to give very much personal information in order to access SELCE's services. That is covered in 'SELCE DATA SECURITY /PROTECTION POLICY 'public contacts.

3. The Data Controller

SELCE is the Data Controller under the Act, which means that it determines what purposes personal information held, will be used for. It is also responsible for notifying the Information Commissioner of the data it holds or is likely to hold, and the general purposes that this data will be used for.

The registered address of the Data Controller is:

*South East London Community Energy,
The Forum at Greenwich, Trafalgar road,
Greenwich, SE10 9EQ*

4. Disclosure

SELCE may share data with other agencies such as the local authority, funding bodies and other voluntary agencies. Personal Data is given to SELCE in confidence, for the uses of which the Individual is made aware, and only for the use of SELCE. We will not share personal data with any other body without consent, unless the law stipulates that we disclose this information.

The circumstances in which the law compels SELCE to disclose data (including sensitive data) without the data subject's consent are detailed below:

These are:

- a) Carrying out a legal duty or as authorised by the Secretary of State
- b) Protecting vital interests of an Individual/Service User or other person
- c) The Individual/Service User has already made the information public

- d) Conducting any legal proceedings, obtaining legal advice or defending any legal rights
- e) Monitoring for equal opportunities purposes – i.e. race, disability or religion
- f) Providing a confidential service where the Individual's consent cannot be obtained or where it is reasonable to proceed without consent: e.g. where we would wish to avoid forcing stressed or ill Individuals/Service Users to provide consent signatures.

SELCE regards the lawful and correct treatment of personal information as very important to successful working, and to maintaining the confidence of those with whom we deal. We ensure that personal information is treated lawfully and correctly.

SELCE will adhere to the Principles of Data Protection, as detailed in the Data Protection Act 2018.

Specifically, the Principles require that personal information:

- a) Shall be processed fairly and lawfully and, in particular, shall not be processed unless specific conditions are met
- b) Shall be obtained only for one or more of the purposes specified in the Act, and shall not be processed in any manner incompatible with that purpose or those purposes
- c) Shall be adequate, relevant and not excessive in relation to those purpose(s)
- d) Shall be accurate and, where necessary, kept up to date
- e) Shall not be kept for longer than is necessary
- f) Shall be processed in accordance with the rights of data subjects under the Act
- g) Shall be kept secure by the Data Controller who takes appropriate technical and other measures to prevent unauthorised or unlawful processing or accidental loss or destruction of, or damage to, personal information
- h) Shall not be transferred to any other country unless that country or territory ensures an adequate level of protection for the rights and freedoms of Individuals/Service Users in relation to the processing of personal information

5. Data collection: What information will SELCE collect about its 'private clients'?

SELCE will only collect personal information with the Informed consent of Individuals. 'Informed consent' is when:

A Service user clearly understands why their information is needed, who it will be shared with, the possible consequences of them agreeing or refusing the proposed use of the data and this information is fully and easily accessible to them, and they can complete a clear and unequivocal act of consent to having their data collected.

SELCE will ensure that data is collected within the boundaries defined in this policy. This applies to data that is collected in person, or online, such as by signing up to an email newsletter.

Data that is collected maybe up to and not beyond the following details:

- Full name and address, of home or work
- Email address and phone number
- postal address
- Ethnicity
- Religion
- Age range
- Care needs
- Disabilities
- Household number and composition
- Benefits status
- Household income
- Housing tenure
- Debt status

6. Data Storage

Information and records relating to service users will be stored securely and will only be accessible to authorised staff and volunteers.

Information will be stored for only as long as it is needed or required statute and will be disposed of appropriately.

It is SELCE's responsibility to ensure all personal and company data is non-recoverable from any computer system previously used within the organisation, which has been passed on/sold to a third party.

7. Data access and accuracy

All Individuals/Service Users have the right to access the information SELCE holds about them. SELCE will also ensure that this information is kept up to date by asking data subjects whether there have been any changes.

In addition, SELCE will ensure that a Data Protection Officer is charged with specific responsibility for ensuring compliance with Data Protection

- Everyone processing personal information understands that they are contractually responsible for following good data protection practice, is appropriately trained, supported and supervised to follow the data protection policy
- Anybody wanting to make enquiries about handling personal information knows what to do and their inquiry is handled promptly and courteously
- It will regularly review and audit the ways it holds, manages and uses personal information and assesses its methods and effectiveness in relation to handling personal information
- All staff and volunteers are aware that a breach of the rules and procedures identified in this policy may lead to disciplinary action being taken against them

We delegate the storage of our 'private clients' personal data to some online platforms. These are:

- **Mailchimp.** Their GDPR notice is here: <https://mailchimp.com/gdpr/>
- **Google.** Their privacy policy is here: <https://policies.google.com/privacy?hl=en-GB>
- **Microsoft.** Their privacy policy is here: <https://privacy.microsoft.com/en-gb/privacystatement>
- **Eventbrite,** where public contacts give their emails when they sign up to our events. Their privacy policy is here: https://www.eventbrite.co.uk/support/articles/en_US/Troubleshooting/eventbrite-privacy-policy?lg=en_GB

This policy will be updated as necessary to reflect best practice in data management, security and control and to ensure compliance with any changes or amendments made to the Data Protection Act 2018 and General Data Protection Regulation.

In case of any queries or questions in relation to this policy please contact the SELCE Data Protection Officer:

Giovanna Speciale

Position: Company Secretary

Date: 07/02/2022

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