



# Data Protection & GDPR Policy

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## 1. INTRODUCTION

The General Data Protection regulations (GDPR) applies to ‘controllers’ and ‘processors’. A controller determines the purposes and means of processing personal data. A processor is responsible for processing personal data on behalf of a controller.

If you are a processor, then GDPR places specific legal obligations on you; for example, you are required to maintain records of personal data and processing activities. You will have legal liability if you are responsible for a breach. However, if you are a controller, you are not relieved of your obligations where a processor is involved – the GDPR places further obligations on you to ensure your contracts with processors comply with the GDPR.”

Therefore this policy applies to all board members, staff and volunteers of Lifespace. The charity will also ensure that any agreements with other organisations undertaking activity on behalf of Lifespace reflect data protection regulations.

The purpose of this policy is to enable Lifespace to:

- Comply with the law in respect of the data it holds about individuals;
- Follow good practice;
- Protect Lifespace’s young people, trustees, staff, volunteers and other individuals;
- Reduce the likelihood, and potential impact of, a breach of its responsibilities.

## 2. BRIEF INTRODUCTION TO DATA PROTECTION ACT 2018

The Data Protection Act gives individuals the right to know what information is held about them. It provides a framework to ensure that personal information is handled properly.

The Act works in two ways. Firstly, it states that anyone who processes personal information must comply with eight principles, which make sure that personal information is:

- Fairly and lawfully processed.
- Processed for limited purposes/obtained only for specific, lawful purposes.
- Adequate, relevant and not excessive.
- Accurate and up to date.
- Not kept for longer than is necessary.
- Processed in line with the rights of Data Subjects.
- Protected in appropriate ways.
- Not transferred to other countries without adequate protection.

The second area covered by the Act provides individuals with important rights, including the right to find out what personal information is held on computer and most paper records.

## 3. POLICY REVIEW

The policy will be reviewed annually by the Data Protection Officer with final approval by the Board of Trustees. It will also be reviewed in response to changes in relevant legislation, contractual arrangements, good practice or in response to an identified failing in its effectiveness.

## 4. GDPR TERMINOLOGY

This “**Data**” is information which is stored electronically, on a computer, or in certain paper based filing systems. This includes photographic images and video footage.

“**Data subjects**” are all living individuals about whom we hold and process personal data. A data subject need not be a UK national or resident. All data subjects have legal rights in relation to their personal data.

“**Personal data**” means data relating to a living individual who can be identified from that data (or from that data and other information in our possession). Personal data can be factual (such as a name, address telephone or date of birth) or it can be an opinion (such as from a questionnaire).

“**Special Category**” / “**Sensitive personal data**” includes information about a person's racial or ethnic origin, political opinions, religious or similar beliefs, trade union membership, physical or mental health condition or sexual life, or about any offence committed or alleged to have been committed by that person. Sensitive personal data can only be processed under strict conditions, and will usually require the express consent of the person concerned.

“**Data controllers**” are the organisations which determine the purposes for which, and the manner in which, any personal data is processed. They have a responsibility to establish practices and policies in line with the Act.

“**Data Protection Officer**” is the name given to the person in an organisation who is the central point of contact for all data compliance issues.

“**Data processors**” include any person who processes personal data on behalf of a data controller.

“**Processing**” is any activity that involves use of the data. It includes obtaining, recording or holding the data, or carrying out any operation or set of operations on the data including organising, amending, retrieving, using, disclosing, erasing or destroying it. Processing also includes transferring personal data to third parties.

## 5. POLICY STATEMENT

All This policy statement covers the following specific GDPR requirements:

- Our lawful basis for processing personal data.
- Data security.
- Record keeping and retention policy.
- Individuals’ rights under the GDPR.

Lifespace will:

- comply with both the law and good practice.
- respect individuals’ rights.
- be open and honest with individuals whose data is held.
- provide training and support for staff and volunteers who handle personal data, so that they can act confidently and consistently.

Lifespace recognises that its first priority under the Data Protection Act is to avoid causing harm to individuals. Information about staff, volunteers, children and young people will be used fairly, securely and not disclosed to any person unlawfully.

Secondly, the Act aims to ensure that the legitimate concerns of individuals about the ways in which their data may be used are considered. In addition to being open and transparent, Lifespace will seek to give individuals as much choice as is possible and reasonable over what data is held and how it is used.

Lifespace is the Data Controller and is registered under the Data Protection Act 2018. All processing of personal data will be undertaken in accordance with the data protection principles.

## 6. RESPONSIBILITIES

The Board recognises its overall responsibility for ensuring that Lifespace complies with its legal obligations.

## 7. DATA PROTECTION OFFICER

The Data Protection Officer is currently the Chief Executive, who has the following responsibilities:

- Briefing the Board on Data Protection responsibilities.
- Reviewing Data Protection and related policies.
- Advising other staff on Data Protection issues.
- Ensuring that Data Protection induction and training takes place.
- Handling subject access requests.
- Approving unusual or controversial disclosures of personal data.
- Ensuring contracts with Data Processors have appropriate data protection clauses.
- Electronic security.
- Approving data protection-related statements on publicity materials and letters.

Each member of staff and volunteer at Lifespace who handles personal data will comply with the organisation’s operational procedures for handling personal data (including induction and training) to ensure that good Data Protection practice is established and followed.

All staff and volunteers are required to read, understand and accept any policies and procedures that relate to the personal data they may handle in the course of their work.

Significant breaches of this policy will be handled under Lifespace’s *Disciplinary Policy*.

## 8. LAWFUL BASIS FOR PROCESSING PERSONAL DATA

The lawful bases for processing are set out in Article 6 of the UK GDPR. At least one of these must apply whenever you process personal data:

- a. **Consent:** the individual has given clear consent for you to process their personal data for a specific purpose.
- b. **Contract:** the processing is necessary for a contract you have with the individual, or because they have asked you to take specific steps before entering into a contract.
- c. **Legal obligation:** the processing is necessary for you to comply with the law (not including contractual obligations).
- d. **Vital interests:** the processing is necessary to protect someone's life.
- e. **Public task:** the processing is necessary for you to perform a task in the public interest or for your official functions, and the task or function has a clear basis in law.
- f. **Legitimate interests:** the processing is necessary for your legitimate interests or the legitimate interests of a third party, unless there is a good reason to protect the individual's personal data which overrides those legitimate interests. (This cannot apply if you are a public authority processing data to perform your official tasks).

## 9. TRANSPARENCY

Lifespace is committed to ensuring that in principle Data Subjects are aware that their data is being processed and

- For what purpose it is being processed;
- What types of disclosure are likely; and
- How to exercise their rights in relation to the data.

Data Subjects will generally be informed in the following ways:

- Young people, parents or guardian: when they request (on paper, by email, on-line or by phone) services.
- Volunteers: in the Volunteer Agreement.
- Staff: in the staff terms and conditions.

## 10. CONSENT

If you Consent will normally not be sought for most processing of information about staff. Although staff details will only be disclosed for purposes unrelated to their work for Lifespace (e.g. financial references) with their consent.

Information about volunteers will be made public according to their role, and consent will be sought for (a) the means of contact they prefer to be made public, and (b) any publication of information, which is not essential for their role.

Information about children and young people will only be made public with their consent. (This includes photographs.)

'Sensitive' data about children and young people (including health information) will be held only with the knowledge and consent of the individual.

Consent should be given in writing, although for some services it is not always practicable to do so. In these cases, verbal consent will always be sought to the storing and processing of data. In all cases it will be documented on the database that consent has been given.

All Data Subjects will be given the opportunity to opt out of their data being used in particular ways, such as the right to opt out of direct marketing (see below).

Lifespace acknowledges that, once given, consent can be withdrawn, but not retrospectively. There may be occasions where Lifespace has no choice but to retain data for a certain length of time, even though consent for using it has been withdrawn.

## 11. DATA PROTECTION AND SECURITY

Should Data protection relates to the storage, access, and control of personal information held for Lifespace work and with the permission of the person to whom those details relate. Personal data may be kept electronically or in hard copy format and may only be used for legitimate purposes related to the work Lifespace does.

Lifespace is strongly committed to data security and we take reasonable and appropriate steps to protect personal information from unauthorised access, loss, misuse, alteration or corruption.

We have put in place physical, electronic, and managerial procedures to safeguard and secure the information you provide to us. Only authorised employees, volunteers and contractors under strict controls will have access to your personal information.

All staff and volunteers must comply with the eight updated Data Protection Principles on how data can be legally processed:

1. Personal data shall be processed fairly and lawfully and, in particular, shall not be processed unless –  
(a) at least one of the conditions in Schedule 2 is met, and  
(b) in the case of sensitive personal data, at least one of the conditions in Schedule 3 is also met.
2. Personal data shall be obtained only for one or more specified and lawful purposes, and shall not be further processed in any manner incompatible with that purpose or those purposes.
3. Personal data shall be adequate, relevant and not excessive in relation to the purpose or purposes for which they are processed.
4. Personal data shall be accurate and, where necessary, kept up to date.
5. Personal data processed for any purpose or purposes shall not be kept for longer than is necessary for that purpose or those purposes.
6. Personal data shall be processed in accordance with the rights of data subjects under this Act.
7. Appropriate technical and organisational measures shall be taken against unauthorised or unlawful processing of personal data and against accidental loss or destruction of, or damage to, personal data.
8. Personal data shall not be transferred to a country or territory outside the European Economic Area unless that country or territory ensures an adequate level of protection for the rights and freedoms of data subjects in relation to the processing of personal data.

Staff and volunteers have a personal responsibility to apply training and procedures to keep people's data safe. Unauthorised disclosure of personal information can have very serious consequences which could be a disciplinary matter.

Data Protection will be included in the induction training for all volunteers.

Lifespace will provide opportunities for staff to explore Data Protection issues through training, team meetings, and supervisions.

Lifespace has databases and other data storage systems which hold personal data and sensitive personal data. Therefore, steps are taken to keep data securely and to restrict access to those staff and volunteers who have a legitimate purpose using specified personal data in their roles. Security measures include for example password protection, locked paper filing cabinets, secure IT systems and processes. Confidential shredding of data no longer needed. and secure archives.

## **12. RETENTION PERIODS AND THE DISPOSAL OF PERSONAL DATA**

We hold a retention and disposal schedule which explains how long we keep different types of records and documents for, including records and documents containing personal data. Personal data is deleted or securely destroyed at the end of its retention period.

## **13. CONFIDENTIALITY**

All Lifespace employees and volunteers are required to respect the right of children, young people and of other employees and volunteers to privacy and confidentiality as far as possible within the constraints of legal requirements and the safety of other people.

Absolute confidentiality cannot be guaranteed, and this will be made clear to children and young people at the earliest possible opportunity.

Where it is thought necessary to pass on information to another individual or organisation this will be assessed on the basis of their application and full consideration of whether there is a legal duty to disclose information. The client will be advised in writing that information has been requested, and by whom. Where possible, the consent of the person about whom the request has been made will be sought, if at all possible. The client will be advised that they should seek legal advice if they strongly object to information being passed to a third party.

## 14. DATA BREACHES

A data breach is when personal data or sensitive personal data is disclosed to third parties without permission to do so. The severity of the breach will depend on:

- the probability that data has been disclosed to an unauthorised third party.
- the sensitivity of the data disclosed.
- the amount of data disclosed.
- the ease with which personal data can be attributed to individuals.

Once a member of staff or volunteer becomes aware that there may have been a data breach, they must inform their line manager / supervising member of staff, who will take a detailed note of what has occurred, what action (if any) has been taken and then share this with the DPO.

## 15. DATA ACCURACY

Lifespace will regularly review its procedures for ensuring that its records remain accurate and consistent and, in particular:

- Data storage systems are reviewed and re-designed, where necessary, to encourage and facilitate the entry of accurate data.
- Data on any individual will be held in as few places as necessary, and all staff and volunteers will be discouraged from establishing unnecessary additional data sets.
- Effective procedures are in place so that all relevant systems are updated when information about any individual changes.
- Data will be corrected if shown to be inaccurate.

## 16. DIRECT MARKETING

Lifespace will treat the following unsolicited direct communication with individuals as marketing:

- Seeking donations and other financial support.
- Promoting any Lifespace services.
- Promoting Lifespace events.
- Promoting membership to supporters.
- Promoting sponsored events and other fundraising exercises.
- Marketing the products of Lifespace.
- Marketing on behalf of any other external company or voluntary organisation.

Whenever data is first collected which might be used for any marketing purpose, this purpose will be made clear, and the Data Subject will be given a clear opt out. If it is not possible to give a range of options, any opt-out which is exercised will apply to all Lifespace marketing.

We will only carry out telephone marketing where consent has been given in advance.

Whenever e-mail addresses are collected, any future use for marketing will be identified, and the provision of the address made optional.

## 17. INDIVIDUALS' RIGHTS AND ACCESS TO INFORMATION

### 17.1 GDPR RIGHTS

Individuals have the following rights under GDPR:

- The right to be informed.
- The right of access.
- The right to rectification.
- The right to erasure.
- The right to restrict processing.
- The right to data portability.
- The right to object.
- Rights in relation to automated decision making and profiling.

In relation to exercising these rights, any individual can request to see what information Lifespace holds about them through a 'subject access request', and to request that that information is rectified, erased or restricted. If Lifespace does not have an overriding lawful purpose for retaining that information, for example, because it relates to a safeguarding concern.

## 17.2 ACCESS TO DATA

All children and young people (or parents/guardians) have the right to request access to all information stored about them. Any subject access requests will be handled by the Data Protection Officer within the required time limit.

Subject access requests must be in writing. All staff and volunteers are required to pass on anything, which might be a subject access request to the Data Protection Officer immediately.

Where the individual making a subject access request is not personally known to the organisation, their identity will need to be verified before handing over any information.

The required information will be provided in permanent form unless the applicant makes a specific request to be given supervised access in person.

Lifespace will provide details of information to service users who request it unless the information may cause harm to another person.

Staff have the right to access their file to ensure that information is being used fairly. If information held is inaccurate, the individual must notify the Chief Executive so that this can be recorded on file.

## 17.3 SUBJECT ACCESS REQUESTS

Under the General Data Protection Regulation (GDPR), you have certain rights in respect to your data:

**The right to be informed:** the right to know what Lifespace is doing with your personal data and why.

**The right of access:** the right to see exactly what information Lifespace holds on you.

**The right to rectification:** the right to tell us to correct personal data promptly.

**The right to erasure:** the right to ask us to erase any and all data that we hold on you.

**The right to restrict processing:** the right to tell us not to perform a particular process on your personal data.

**The right to data portability:** the right to have your data provided in a machine-readable format that other organisations can easily access, e.g. a CSV file.

**The right to object:** the right to object to processing even where we have a legitimate lawful basis, based on your specific situation.

**Rights in relation to automated decision-making and profiling** rights around where we can or cannot use automated systems to process data.

If you would like to exercise any of your rights around your data, please complete the attached form.

## 18. REFERENCES

This policy references:

- <https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/key-definitions/>
- <https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/>

## 19. RELATED LIFESPACE POLICIES

- Disciplinary Policy
- Staff Behaviour ("Code of Conduct") Policy



## APPENDIX 1:

# Subject Access Request

When submitting a Subject Access Request under the Data Protection Act 2018, Lifespace has one calendar month to release your information. This period begins once the Data Protection Officer receives your request, along with valid proof of your identity.

The information you provide on this form will allow us to identify where the information that you have requested may be located. Please provide as much detail as possible when submitting your request. We may contact you for further clarification, if necessary.

### SECTION 1:

Are you the Data Subject? (The individual who is the subject of the required information). Please tick the appropriate box.

I **AM** the Data Subject and enclose evidence of my identity e.g. photocopy of driving license, birth certificate, passport or marriage certificate.

I am **NOT** the Data Subject, but I am acting on their behalf. I have written authority, which I enclose and evidence of their identify e.g. photocopy of their driving licence, birth certificate or passport.

I am **NOT** the Data Subject, but I am acting on their behalf as their parent or legal guardian and enclose evidence of their identity e.g. photocopy of birth certificate, passport.

### SECTION 2: DETAILS OF THE DATA SUBJECT

Full name	
Former name(s)	
Current address (including postcode)	
Former address(s)	
Date of birth	
Contact telephone number (including area code)	
Email address	
Any additional information that may help identify your relationship with Lifespace	

## SECTION 4: INFORMATION ABOUT YOUR REQUEST

Describe the information you are requesting in as much detail as possible.

Where possible, please provide the details of relevant names, dates and/or projects/services at Lifespace. This will enable us to access and release your information more promptly.

Signature	
Date	
How would you like the information to be released to you? Please tick	Hard Copy (by post): <input type="checkbox"/> Electronic copy – PDF. (by email): <input type="checkbox"/> (Hard Copy) Collect in person: <input type="checkbox"/>

Please return this form either by email to [lisa.carroll@lifespace.org.uk](mailto:lisa.carroll@lifespace.org.uk) or at the following address: Lisa Carroll, Chief Executive, Tyler House, Tyler Street, Stratford-Upon-Avon, Warwickshire, CV37 6TY

## SECTION 5: IDENTIFICATION OF PERSON REQUESTING A SUBJECT ACCESS REQUEST

Document(s) viewed (e.g passport)	Date of checking	Signature of DPO at Lifespace

### HOW LIFESPACE WILL COLLATE THE INFORMATION

Once the information you have requested has been confirmed, we will begin the process of contacting colleagues across Lifespace and collating the information.

### LIFESPACE WILL REVIEW YOUR INFORMATION

Before we release your information to you, it is very important that we review it to ensure that it does not contain the personal data of other individuals (third parties). All personal information of other individuals will be redacted (removed or blocked out), as it is not relevant to you. If we have had to redact information, then this will be drawn to your attention in the covering letter.

If your request contains a substantial amount of information (from various sources), then reviewing it can be time consuming. We review information as we receive it and aim to release it to you within one calendar month of the request being received and your identification confirmed. In exceptional circumstances where it is not possible to comply within this period you will be informed of the delay, the reason for the delay, and given a timescale for when your request is likely to be met.

In certain circumstances, Data Protection legislation may permit Lifespace to withhold information, for example if the information is likely to cause serious harm to the physical or mental health or condition of you, or any other person, and information relating to or provided by a third person who has not consented to the disclosure.

### LIFESPACE WILL RELEASE YOUR INFORMATION

Once the information has been reviewed, we will contact you and confirm the details for releasing it to you. If you have requested that we provide your information electronically, this will be encrypted with a password. If you have requested that we send your information to you by post, then we will do so using Royal Mail 'Signed For' delivery.

If you have any queries regarding your requested information, then you will be able to raise these with us via [admin@lifespace.org.uk](mailto:admin@lifespace.org.uk)

## SECTION 6: WE DELETE YOUR INFORMATION

It is important that we do not retain your personal data for any longer than is necessary. Therefore, all of the information **collated as part of your SAR** will be deleted either 12 months after the release date, or 12 months after the last query you made regarding the request has been resolved; whichever is the later. Original copies of the requested information will remain where they were located and will be retained as per Lifespace's Data Retention schedule.

## APPENDIX 2:

# Privacy Notice

Lifespace is a Charity Registered in England (No. 1122170) and a Company Limited by Guarantee (No. 6428820). Lifespace manages and delivers a range of contracts and projects.

This privacy notice covers what we do with any information we collect about you when accessing the Lifespace website.

("We") are committed to protecting and respecting your privacy. This policy (together 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 views and practices regarding your personal data and how we will treat it. The rules on processing of personal data are set out in the General Data Protection Regulation (the "GDPR").

## 1. DEFINITIONS

**Data controller** - A controller determines the purposes and means of processing personal data.

**Data processor** - A processor is responsible for processing personal data on behalf of a controller.

**Data subject** – Natural person

### 1.1 CATEGORIES OF DATA:

**Personal data and special categories of personal data** **Personal data** - The GDPR applies to 'personal data' meaning any information relating to an identifiable person who can be directly or indirectly identified in particular by reference to an identifier (as explained in Article 6 of GDPR). For example name, passport number, home address or private email address. Online identifiers include IP addresses and cookies.

**Special categories personal data** - The GDPR refers to sensitive personal data as 'special categories of personal data' (as explained in Article 9 of GDPR). The special categories specifically include genetic data, and biometric data where processed to uniquely identify an individual. Other examples include racial and ethnic origin, sexual orientation, health data, trade union membership, political opinions, religious or philosophical beliefs.

**Processing** - means any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

**Third party** - means a natural or legal person, public authority, agency or body other than the data subject, controller, processor and persons who, under the direct authority of the controller or processor, are authorised to process personal data.

## 2. WHO ARE WE?

Lifespace Trust is the data controller. This means we decide how your personal data is processed and for what purposes. Our contact details are: Lifespace Trust, Tyler House, Tyler Street, Stratford-upon-Avon, Warwickshire CV37 6TY. For all data matters contact our data representative using the details above.

## 3. THE PURPOSE(S) OF PROCESSING YOUR PERSONAL DATA

We use your personal data for the following purpose: To deliver safe and effective mentoring services to children and young people to help them reduce distress, build resilience and achieve more.

## 4. THE CATEGORIES OF PERSONAL DATA CONCERNED

With reference to the categories of personal data described in the definitions section, we process the following categories of your data:

- Personal data (for example, your name, gender, date of birth, school/college (if applicable))
- Special categories of data (for example, information about your physical or mental health if supplied to us by you or by the person or organisation that requested mentoring for you.)

We have obtained your personal data from the mentoring request form completed by the person or organisation that requested mentoring for you and, once mentoring has started, from you during mentoring sessions.

## 5. WHAT IS OUR LEGAL BASIS FOR PROCESSING YOUR PERSONAL DATA?

- a. **Personal data (article 6 of GDPR) Our lawful basis for processing your general personal data:** Processing necessary for the purposes of the legitimate interests of the data controller or a third party, except where such interests are overridden by the interests or fundamental rights or freedoms of the data subject To deliver safe and effective mentoring services to children and young people to help them reduce distress, build resilience and achieve more.
- b. **Special categories of personal data (article 9 of GDPR) Our lawful basis for processing your special categories of data:** Processing necessary to protect the vital interests of a data subject or another individual where the data subject is physically or legally incapable of giving consent This relates to data supplied to us by the person or organisation that requested mentoring for you prior to us agreeing to provide mentoring for you. Processing relates to personal data manifestly made public by the data subject This relates to data provided to us by you during mentoring sessions More information on lawful processing can be found on the [ICO website](#).

## 6. Sharing your personal data

Your personal data will be treated as strictly confidential, and will be shared only with your Lifespace mentor and, if required to facilitate delivery of a safe and effective mentoring services, our small administrative team.

## 7. How long do we keep your personal data?

We keep your personal data for no longer than reasonably necessary and we only retain your data either in limited form to record that you received a service from us or in more detailed form in the case of any legal claims/complaints or child protection purposes etc.

## 8. Providing us with your personal data

You are under no statutory or contractual requirement or obligation to provide us with your personal data but failure to do so could result in us not offering a mentoring service to you or stopping an existing mentoring service.

## 9. Your rights and your personal data

Unless subject to an exemption under the GDPR, you have the following rights with respect to your personal data:

- The right to request a copy of the personal data which we hold about you;
- The right to request that we correct any personal data if it is found to be inaccurate or out of date;
- The right to request your personal data is erased where it is no longer necessary to retain such data;
- The right to withdraw your consent to the processing at any time, where consent was your lawful basis for processing the data;
- The right to request that we provide you with your personal data and where possible, to transmit that data directly to another data controller, (known as the right to data portability), (where applicable i.e. where the processing is based on consent or is necessary for the performance of a contract with the data subject and where the data controller processes the data by automated means);
- The right, where there is a dispute in relation to the accuracy or processing of your personal data, to request a restriction is placed on further processing;
- The right to object to the processing of personal data, (where applicable i.e. where processing is based on legitimate interests (or the performance of a task in the public interest/exercise of official authority); direct marketing and processing for the purposes of scientific/historical research and statistics).

## 10. Transfer of Data Abroad

We do not transfer personal data outside the EEA.

## 11. Automated Decision Making

We do not use any form of automated decision making in our business.

## 12. Further processing

If we wish to use your personal data for a new purpose, not covered by this Data Privacy Notice, then we will provide you with a new notice explaining this new use prior to commencing the processing and setting out the relevant purposes and processing conditions.

## 13. Changes to our privacy policy

Any changes we may make to our privacy policy in the future will be made available through our usual communication channels (e.g. our website) and, where appropriate, communicated directly to you.

## 14. How to make a complaint

To exercise all relevant rights, queries or complaints please in the first instance contact our data representative using the following contact details: Lifespace Trust, Tyler House, Tyler Street, Stratford-upon-Avon, Warwickshire CV37 6TY. If this does not resolve your complaint to your satisfaction, you have the right to lodge a complaint with the [Information Commissioners Office](#) on 03031231113 or via email <https://ico.org.uk/global/contact-us/email/> or at the Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF, England.

This Policy is communicated to all staff, trustees suppliers and sub-contractors. It will be published on our website and made available to interested parties.

Date of Issue: July 2024	Signed: Lisa Carroll	CEO
	Signed: Mark Beardmore	Trustee (Governance & Compliance)
Date of Next Review:	July 2027	
Policy Owner	Chief Executive Officer	