**Privacy Notice for Hearing Loss Cornwall**

Your information and your privacy are important — to you and to us. This policy explains how we use your information and how we keep it safe. Most importantly, it explains the choices you can make at any time about how your information is used.

We seek to hold only such personal data that is relevant and essential to support the provision of our services and charitable aims.

It is only obtained for a specific purpose and is processed fairly and lawfully and relevant to the purposes for which it is processed.

We aim to keep this accurate and up-to-date and do not hold this information any longer than is necessary.

Hearing Loss Cornwall seeks to comply with the letter and spirit of the General Data Protection Regulation.

**What personal data does hearing Loss Cornwall (HLC) collect and what is it used for?**

1. Who is your data shared with?
2. Where does this data come from?
3. How is your data stored?
4. Who is responsible for ensuring compliance with the relevant laws and regulations?
5. Who has access to your data?
6. What is the legal basis for collecting this data?
7. How you can check what data we have about you?
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**What personal data does HLC collect & What is this personal data used for?**

1a) The data we routinely collect is patient names and NHS numbers for NHS services
1b) We also collect names, addresses for our advocacy clients
1c) We collect names, email addresses and phone numbers from providers
1d) Staff data – what is legally required

We will only hold data that you have given us or we have received through trusted partners such as the NHS or your interpreter/support worker

**Who is your data shared with?**Reference data:

* 1a) This is anonymised and used only for the purpose of arranging communication services. To create the booking with interpreters/communication support we only share initials as the interpreters know the patients and hold their own anonymised files. Bookings are requested by NHS through an encrypted email system
* (1b) This data is recorded on an encrypted database that requires a secure login. Any written notes that are taken before are password protected. Handwritten notes are destroyed or if they are essential, are stored in a locked filing cabinet.
* 1c) This data has been given to us and we do not share this further without your permission, see 1b)
* 1d) This data is purely used within the charity.

No personal data is used or shared without the persons permission. The NHS require a signature for this purpose.

**NB:** We will disclose your personal information to third parties if we are under a duty to disclose or share your personal data to comply with any legal or regulatory obligation or request.

**Where does this data come from?**
Data for most of our members comes from the NHS, Cornwall Council through a service referral process, or communication support workers and sometimes it will come from specialist professionals

**How is your data stored?**This information is mainly stored in digital form on computers, but occasionally also on paper forms.

* Paperwork is stored in locked filing cabinets
* No information is taken out of the office
* Notes with personal data are shredded once dealt with
* We follow organisational procedures for uploading notes
* We lock our screen when visitors arrive or we go on break
* Any personal data that is not recorded on the encrypted databases are password protected

**Who is responsible for ensuring compliance with the relevant laws and regulations?**
The responsibility for ensuring HLC discharges its obligations under the GDPR is given to one of our trustees who has been nominated by the HLC Committee as the Accounting Officer. Specifically the executive officer of HLC will work closely with this nominated trustee in the role as Data Control Officer.

**Who has access to your data?**Only the staff members of HLC have access to members’ data in order for them to carry out their legitimate tasks for HLC as joint data controllers. The only time that any information is shared is with appointed advocates so that appropriate information can be amended on the encrypted system. They are not free to use it for any other purpose. We protect the confidentiality, accuracy, and availability of the information we collect about you.

**What is the legal basis for collecting this data?**HLC collects personal data that is necessary for the purposes of its *legitimate interests* as a charitable organisation to ensure that it can meet its aims and objectives

**How you can check what data we have about you?**
You can contact us with a “Subject Access Request” if you want to ask us to provide you with any information, we hold about you. If you are interested in any particular aspects, specifying them will help us to provide you with what you need quickly and efficiently. We are required to provide this to you within one month.

**Does HLC collect any “special” data?**The GDPR refers to sensitive personal data as “special categories of personal data”.

 We regard all our information as sensitive due to the nature of the people we serve. Even the trustees do not have access to this data and would have to have very good reason to ask for a “subject access request”. In this regard, HLC would have to make enquiries as to what this would entail.

**How can you ask for data to be removed, limited or corrected?**
Our data is generally provided by the council, NHS services or through interpreters. Initially, you could put in a written request for HLC to remove what data we hold, however, this would impact on the support we can give you. We would also need further written evidence to take to the above services that we have noted to ensure that they remove this information according to their processes. This could have a significant impact on personal health and welfare.

Should you wish to review, verify, correct, or request erasure of your personal information, object to the processing of your personal data, or request that we do not transfer a copy of your personal information to another party, please contact the

**Data Control Officer:**
Clare Greenwood, Hearing Loss Cornwall, 3 Walsingham Place, TR1 2RP

**Your data is only used**HLC only keep data that is essential to supporting your needs. You will never receive unsolicited contact and your information is only shared with the specific people required to support your needs. We respect client and patient privacy at all times

**How long we keep your data for, and why?**We only keep data that is relevant to current needs. Other data such as previous staff or members is kept for seven years. We hold a list of general contacts who we need to service our day- to- day work. This is kept as a password protected document. Any written notes are shredded once the data has been uploaded onto this file

**What happens if a person dies?**This data will be removed after two years
If requested, by their next-of-kin, to delete it, we will do so on the same basis as when requested to remove data by a former member.

**Can you download your data to use it elsewhere?**HLC holds limited personal data we do not transport this. The only place that we have this stored is on a back-up drive in case current systems fail. This drive is stored safely in a locked filing cabinet.