

Threshold DAS Limited

Privacy Policy

Introduction

Threshold-DAS Ltd takes the privacy of your personal information very seriously and is committed to safeguarding your privacy and your personal information, complying with the GDPR. This Privacy Policy relates to us and any personal information we collect from you directly, or indirectly via 3rd party data providers, covering individuals who:

- Visit our main website;
- Use our services;
- Contact us concerning our services;
- Attend or register to attend our events;
- Complete surveys Threshold DAS Ltd has issued or commissioned;
- Complete competition entries Threshold DAS Ltd has issued or commissioned;
- Through telephone research of your organisation and your role in the organisation;
- Through research of public resources to identify organisations and your role in the organisation;
- Are provided to us as part of 3rd party data;
- Supply products or services to Threshold DAS Ltd;
- Have applied to work for Threshold DAS Ltd, or are current or former employees of Threshold DAS Ltd.

This Privacy Policy will explain the following:

- What personal information may be collected about you;
- How Threshold DAS Ltd will use this personal information;
- When Threshold DAS Ltd may use this personal information to contact you;
- How long Threshold DAS Ltd will retain your personal information;
- How this personal information may be shared with other parties;
- How your personal information will be kept secure;
- Your rights regarding the personal information you provide to us;
- How to contact us.

In this policy, personal information means information relating to an identified or identifiable natural person. An identifiable person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, and online identifier or to one or more factors specific to his/her physical, physiological, genetic, mental, economic, cultural or social identity.

Users of our services

Threshold DAS Ltd collects personal information from you when you use our services. Depending on the nature of your service use we may collect personal data, or special category data. In both cases it will always be fully informed and explained, the minimum required to fulfil our obligations, confidential or only accessible by those who require the information to fulfil their obligations to you, secure and adequately filed and stored. We do not share your information with 3rd parties without your prior informed decision. When we do share your information it is either to fulfil our contractual obligations with you, the establishment, exercise or defence of a legal claim, or to fulfil our obligations to a national competent body, subject to professional secrecy, acting to further or fulfil our obligations to you.

We will use this personal information:

- To carry out obligations arising from being a user of our services. The lawful basis for processing your personal information for this purpose will be “Contractual”.
- To send you communications which you have requested.
- These may include information about publications, events, surveys, and service developments and promotions of our services. The lawful basis for processing your personal information for this purpose will be “Legitimate Interest”.
- Threshold DAS Ltd uses profiling to measure your eligibility for our various programmes of support to ensure the support you receive is relevant to you, and your individual situation with no significant effect on you or your rights. The lawful basis for processing your personal information for this purpose will be “Public Interest”.
- This personal information may be made available to 3rd party recipients, to fulfil our contractual obligations with you, the establishment, exercise or defence of a legal claim, or to fulfil our obligations to a national competent body, subject to professional secrecy, acting to further or fulfil our obligations to you. The lawful basis for processing your personal information for this purpose will depend on the nature and purpose of the processing. It may be “Contractual”, “Legal Obligation” or “Public Task”. The data we provide to 3rd parties will never be to further our own interests, we will always act in your best interests.

In order to comply with the GDPR, we must also identify a further basis to collect and process special category data. Special category data refers to data that identifies your:

- Racial or ethnic origin;
- Political opinions;
- Religious beliefs or beliefs of a similar nature;
- Trade union membership;
- Physical or mental health condition;
- Sexual life;
- Genetic or biometric data.

Whilst this list is exhaustive, it does not represent data we deliberately source about you. Due to the nature of domestic abuse and the support that we provide, it may be necessary to ask you to disclose some of this information to us, or you may want to give it freely. In either circumstance we operate on a completely confidential basis, only breaking confidentiality for, but not limited to, the reasons stated below:

- If you reveal a child is being, or in danger of being abused;
- If you reveal you intend to harm yourself or another person;
- If you reveal criminal activity such as a terrorist activity or money laundering;
- If we are compelled by law to reveal information.

One further basis for collecting and processing special category data will depend on the nature and purpose. The additional basis will meet one of the following criteria:

- The data subject has given explicit consent to the processing of personal data for one or more specific purposes;
- Processing is necessary for the purposes of carrying out the obligations and exercising specific rights of the controller or of the data subject in the field of employment and social security and social protection law;
- Processing is necessary to protect the vital interests of the data subject or of another natural person where the data subject is physically or legally incapable of giving consent;
- Processing relates to personal data which are made public by the data subject;
- Processing is necessary for the establishment, exercise or defense of legal claims or whenever courts are acting in their judicial capacity;
- Processing is necessary for reasons of substantial public interest;
- Processing is necessary for the purposes of assessment of medical diagnosis, the provision of health or social care or treatment or the management of health or social care systems and services;
- Processing is necessary for reasons of public interest in the area of public health or ensuring high standards of quality and safety of health care on the basis of Union or Member State law which provides for suitable and specific measures to safeguard the rights and freedoms of the data subject, in particular professional secrecy;
- Processing is necessary for statistical purposes based on Union or Member State law which shall be proportionate to the aim pursued, respect the essence of the right to data protection and provide for suitable and specific measures to safeguard the fundamental rights and the interests of the data subject.

Individuals contacting us concerning our services

Threshold DAS Ltd collects personal information from you when you contact us about services or subscribe to our newsletter or updates, including name, email address and telephone number.

We will use this personal information:

- To ensure you are directed to the appropriate person and return communications which you have requested. The lawful basis for processing your personal information for this purpose will be “Legitimate Interest”.
- To provide information about publications, events, surveys, service developments and promotions of our services. The lawful basis for processing your personal information for this purpose will be “Consent”
- This personal information will not be made available to 3rd party recipients, but may be used for statistical purposes.

Attendees to our events, including online events

Threshold DAS Ltd collects personal information from you when you register at or register to attend an event hosted by or participated with Threshold DAS Ltd. The personal information collected will include your name and email address.

We will use this personal information:

- To carry out obligations arising from being a registered attendee of an event. The lawful basis for processing your personal information for this purpose will be “Legitimate Interest”.

- To send you communications which you have requested. The lawful basis for processing your personal information for this purpose will be “Legitimate Interest”.
- The personal information will not be made available to 3rd party recipients, but may be used for statistical purposes.

How long will you retain my personal information?

Threshold DAS Ltd operated by a strict retention policy. We store your information for no longer than necessary. Service user’s data is kept for a maximum of 3 years after contact with you has stopped, unless there is a vulnerable child involved or the law requires we hold it for a longer period. You will be notified prior to your engagement with support how you might have access to your information, how you might have it rectified should you believe any information we hold is inaccurate, how you might object to any of your information collected and how you can apply to have that information erased if appropriate. If your information is not collected by the end of its retention period, it will be disposed of by the use of a cross-cut shredder.

Any information obtained from anyone contacting our service will be destroyed when it is no longer needed. If collected for statistical purposes it is immediately anonymised.

Information obtained from anyone opting in to receive our newsletter, events or promotional material will remain on a mailing list until the individual has opted not to be. This can simply be done by responding to the email address that has sent you the material and requesting that you no longer wish to receive contact from us.

How is my personal information kept secure?

Threshold DAS Ltd takes the security of your data very seriously. We undertake an analysis of the risks presented by our collection and processing of your data and use this to assess the appropriate level of security we need to put in place. We have several policies that govern information security and we review them on a regular basis. Even this notice has been developed with your data security in mind. We have deliberately not named our third party processors so even if someone wanted to test our third party’s data security measures to access your data they would not know where to look.

These are some of the ways we ensure your information is kept securely:

- Access to our offices are restricted and monitored;
- All staff and volunteers are DBS checked;
- All staff and volunteers are subject to a strict confidentiality agreement;
- We have CCTV and intrusion alarms that are monitored remotely;
- Access to your information is restricted, and can only be altered or deleted by those authorised to do so;
- All electronic data is backed up once a day and can be recovered if accidentally lost, damaged, altered or deleted by those with authorised access;
- All paper documents are stored in locked cabinets or cupboards;
- All digital data is stored on our secure server which undergoes regular penetration testing and vulnerability scans, undertaken by a professional third party, bound contractually to confidentiality. Our server also operates with strong anti-virus software and firewalls;

- All paper documents are destroyed with the use of a cross-cut shredder, all digital storage is professionally destroyed by a third-party, bound contractually to confidentiality;
- All external emails that contain confidential information are sent using strong encryption;
- We do not permit our staff to use their personal devices for work purposes. We do have staff that work from home, however, all of their work is done through our secure server, nothing is stored on the device itself, and every effort is made to ensure the security of the device the work is carried out upon.
- As a general practice we do not physically transport your data. If for any reason physical data transportation is unavoidable, it will only ever be done digitally via a strong encrypted removable storage device, or, if in a paper format, discreetly, with every effort made to ensure its safety from unauthorised access.

To ensure we can provide fully holistic services of support, we use a comprehensive database that is regulated by a professional third party who uses an additional professional party to host its server. This is how they have ensured your data is protected:

- The database is fully GDPR compliant, as is the database regulator and the company they use to host their secure server;
- The database regulator's staff are DBS checked and signed confidentiality agreements. The secure server host staff are Security Checked (SC). SC is defined as: "Security Check, determines that a person's character and personal circumstances are such that they can be trusted to work in a position which involves long-term, frequent and uncontrolled access to SECRET assets";
- Staff in both parties are restricted by level of access;
- The server host has a dedicated security team;
- Neither party processes data in any way;
- Both parties' are subject to regular security reviews, penetration tests, vulnerability scans, the results of which Threshold DAS Ltd have access to;
- Both parties have extremely impressive policies relating to general data protection.

What are my choices with my personal information?

Threshold DAS Ltd is committed to providing you with control, ensuring your rights and freedoms are championed, and that actions are only ever carried out in your interests. We feel the same way about your rights as an individual data subject.

Your rights concerning your personal information are:

- You can ask about the personal information we hold about you and we will show you, free of charge;
- You can request your personal information is corrected and we will update the details and inform you when completed, free of charge;
- You can object to your data being processed and we will stop processing your data once no longer required for performance of contract or legal obligations, free of charge;
- You can object to receiving communications from us and we will stop all communications. Any 'mail list' communications you receive from us will always include a clear, simple method to 'opt-out' of future correspondence;

- You can ask for your personal information to be erased, once no longer required for performance of contract or legal obligations, free of charge;
- You can ask for copies of the information we have about you for your own personal use;
- You have the right to lodge a complaint with the ICO (Information Commissioner's Office) at any time if you feel we are not fulfilling our obligations to your data protection rights. Visit www.ico.org.uk for more details or to make a complaint.

Service Providers and Third Parties

It is Threshold DAS policy to have a contract of confidentiality with all service providers and third parties if you have direct access or we believe you may indirectly come into contact with confidential information, including personal data. This contract forms an agreement between us, and we are obligated by it to provide you with the same care and security of any personal data we may collect and process about your employees as part of GDPR compliance.

We only ever collect and process personal data in relation to your company or organisation for the performance of contract or legal obligations, and only for the length of time necessary to do so. We do not share any of your information and ensure that any documented personal data is secure, only accessible to those who need it to perform a specific function, and filed in a way that we can promptly address our obligations in the event that data we have in common is subject to an access request, requires rectification or erasure.

We can assure you we are committed to GDPR compliance and are investing in every measure we feel appropriate to ensure it.

Perspective and current and past employees

At Threshold DAS Ltd, we understand that the nature of the work we do can put our employees at risk. We are committed to ensuring that risk is mitigated as much as is possible and have several policies in place to achieve this. Data protection is very much a priority for this endeavour and we are committed to processing only what is necessary, retaining it for the minimum time necessary, and ensuring its security.

Perspective employees:

Perspective employees can be assured that the information provided in the pursuit of employment with us are kept completely confidential, only accessible to the HR officer, the CEO and if appropriate, the line manager responsible for the successful candidate.

We only store your communication with us, CV's and/or application forms for three months after the closing date of the role's recruitment to enable us to provide feedback if required. If your application is successful and you are invited to an interview, the interview pack is retained for three months after the interview date. This is to enable us to defend any accusation of discrimination or unfair selection. A spreadsheet to track the recruitment process is used by the HR officer, this is destroyed three months after the recruitment process has ended. This enables us to navigate the recruitment process efficiently. In all cases the lawful basis for processing your personal data is 'Legitimate Interest'.

Current employees:

Employees of Threshold DAS Ltd are obligated to attend GDPR training and review all policies that have been created or updated for legislation compliance. You are encouraged to direct any questions or concerns you have to the Data Protection responsible person.

Past employees:

Past employees are encouraged to contact Threshold DAS Ltd if they wish to exercise any of their rights as data subjects under the GDPR, or if they would like access to the portion of our retention schedule that concerns them.

Contact us

Threshold DAS Ltd welcomes any comments or queries regarding our privacy statement and its governance. If you would like to contact us about its content, or any of its implications please:

Email: enquiries@threshold-das.org.uk

Call: 01554 752422

Post: 32 Station Road, Llanelli, Carmarthenshire. SA15 1AN

As part of our security principles we will not disclose the names of any of our employees in a public forum. Be assured however that your comment or query will be addressed within an appropriate timescale by our Data Protection responsible person.