

Archway Foundation Friends Privacy Notice

This privacy notice applies if you are, or have been an Archway Friend (service user), or are applying to be an Archway Friend and tells you what to expect us to do with your personal information when you work for us:

- Contact details
- · What information we collect, use, and why
- Lawful bases and data protection rights
- Where we get personal information from
- How long we keep information
- Who we share information with
- Sharing information outside the UK
- How to complain

Contact details

Post

The Archway Foundation, St. Clement's Centre, Cross Street, OXFORD, OX4 1DA, GB

Telephone

01865 790552

Email

office@archwayfoundation.org.uk

Contact details

Post

St. Clements Centre, Cross Street, OXFORD, OX4 1DA

Telephone

01865 790552

Email

office@archwayfoundation.org.uk

What information we collect, use, and why

We collect or use the following information to provide services including via third party referrals (with your express consent):

- Names and contact details
- Gender
- Pronoun preferences
- Ethnicity
- · Addresses and details of type of accommodation
- Date of birth
- Emergency contact details
- · Next of kin details
- Details of pets
- Photographs or video recordings
- Call recordings
- Information about support and care needs (including disabilities, home conditions, dietary requirements and general care provisions)
- Information about support requirements
- Information about lifestyle, interests or personal history
- Information about the impact of our services on your life
- Records of meetings and decisions
- Records of attendance
- Information relating to compliments or complaints

We also collect or use the following special category information to **provide** services including via third party referrals (with your express consent). This information is subject to additional protection due to its sensitive nature:

- Health information (including medical conditions, test results, allergies, medical requirements and medical history)
- Criminal offence data
 - Sexual orientation

We collect or use the following personal information for **service updates or marketing purposes**:

- Names and contact details
- Addresses
- Marketing preferences
- Donation history
- Quotations and personal stories (anonymised unless you have given additional consent)
- Records of consent, where appropriate

We collect or use the following personal information for **dealing with queries**, **incidents**, **complaints or claims**:

- Names and contact details
- Address
- Witness statements and contact details
- Relevant information from previous investigations
- Friend records
- Information relating to health and safety (including incident investigation details and reports and accident book records)
- Correspondence

We also collect or use the following special category information for **dealing with queries**, **incidents**, **complaints or claims**. This information is subject to additional protection due to its sensitive nature:

- Health information
- Criminal offence data (in relation to incidents only)

Lawful bases and data protection rights

Under UK data protection law, we must have a "lawful basis" for collecting and using your personal information. There is a list of possible <u>lawful bases</u> in the UK GDPR. You can find out more about lawful bases on the ICO's website.

Which lawful basis we rely on may affect your data protection rights which are set out in brief below. You can find out more about your data protection rights and the exemptions which may apply on the ICO's website:

- Your right of access You have the right to ask us for copies of your
 personal information. You can request other information such as details
 about where we get personal information from and who we share
 personal information with. There are some exemptions which means you
 may not receive all the information you ask for. Read more about the right
 of access.
- Your right to rectification You have the right to ask us to correct or delete personal information you think is inaccurate or incomplete. <u>Read</u> more about the right to rectification.
- Your right to erasure You have the right to ask us to delete your personal information. Read more about the right to erasure.
- Your right to restriction of processing You have the right to ask us to limit how we can use your personal information. Read more about the right to restriction of processing.
- Your right to object to processing You have the right to object to the processing of your personal data. Read more about the right to object to processing.
- Your right to data portability You have the right to ask that we transfer the personal information you gave us to another organisation, or to you.
 Read more about the right to data portability.

 Your right to withdraw consent – When we use consent as our lawful basis you have the right to withdraw your consent at any time. Read more about the right to withdraw consent.

If you make a request, we must respond to you without undue delay and in any event within one month.

To make a data protection rights request, please contact us using the contact details at the top of this privacy notice.

Our lawful bases for the collection and use of your data

Our lawful bases for collecting or using personal information to **provide services** including via third party referrals (with your express consent) are:

- Legitimate interests we're collecting or using your information because it benefits you, our organisation or someone else, without causing an undue risk of harm to anyone. All of your data protection rights may apply, except the right to portability. Our legitimate interests are:
 - We require the processing of personal information in order to safely and effectively provide services.

For more information on our use of legitimate interests as a lawful basis you can contact us using the contact details set out above.

Vital interests – collecting or using the information is needed when someone's
physical or mental health or wellbeing is at urgent or serious risk. This
includes an urgent need for life sustaining food, water, clothing or shelter. All
of your data protection rights may apply, except the right to object and the
right to portability.

Our lawful bases for collecting or using personal information for **service updates or marketing purposes** are:

- Consent we have permission from you after we gave you all the relevant information. All of your data protection rights may apply, except the right to object. To be clear, you do have the right to withdraw your consent at any time.
- Legitimate interests we're collecting or using your information because it benefits you, our organisation or someone else, without causing an undue risk

of harm to anyone. All of your data protection rights may apply, except the right to portability. Our legitimate interests are:

 Once an interest has been expressed in the work of the Archway Foundation, we send updates about Archway and its activities. The respondent can opt out of these messages at any time.

For more information on our use of legitimate interests as a lawful basis you can contact us using the contact details set out above.

Our lawful bases for collecting or using personal information for **dealing with queries**, **investigations**, **complaints or claims** are:

- Legitimate interests we're collecting or using your information because it benefits you, our organisation or someone else, without causing an undue risk of harm to anyone. All of your data protection rights may apply, except the right to portability. Our legitimate interests are:
 - We require the processing of personal information in order to safely and effectively provide services.

For more information on our use of legitimate interests as a lawful basis you can contact us using the contact details set out above.

Vital interests – collecting or using the information is needed when someone's
physical or mental health or wellbeing is at urgent or serious risk. This
includes an urgent need for life sustaining food, water, clothing or shelter. All
of your data protection rights may apply, except the right to object and the
right to portability.

Where we get personal information from

- Directly from you
- Family members or carers
- Other health and care providers
- Social services
- Charities or voluntary sector organisations

Councils and other public sector organisations

How long we keep information

Data is held for six years following the last contact with the Friend. After that it is deleted from the database. A six-year interval is considered appropriate since Friends quite frequently take extended periods away from social groups or other contact but then take up our services again. We wish to make this as easy as possible for them.

We retain data from unsuccessful applications for up to 12 months.

Who we share information with

We would only share information with the following groups (bullet listed below) either with your consent or if there was a "vital interest" (see above) or legal obligation to do so:

- Family members or carers
- Other health and care providers
- Social services
- Charities or voluntary sector organisations
- Councils and other public sector organisations

Legal obligation – we have to collect or use your information so we can comply with the law. All of your data protection rights may apply, except the right to erasure, the right to object and the right to data portability.

We will also use your information to publicise and provide evidence for our services, for example, to request funding from, and to provide assurance to, donors or Trusts and Foundations. In this instance, unless you have explicitly consented otherwise, we will anonymise this information.

Data processors

Lamplight

This data processor does the following activities for us: This is our client record management system, which allows us to securely store confidential information.

Office 365

This data processor does the following activities for us: We use Office 365 to develop and store documents, send emails and communicate internally.

Mailchimp

This data processor does the following activities for us: Provide mail distribution

system

Others we share personal information with

Other health providers (eg GPs and consultants)

Organisations we need to share information with for safeguarding reasons

Organisations we're legally obliged to share personal information with

Sharing information outside the UK

Where necessary, we will transfer personal information outside of the UK. When doing so, we comply with the UK GDPR, making sure appropriate safeguards are in

place.

For further information or to obtain a copy of the appropriate safeguard for any of the transfers below, please contact us using the contact information provided above.

Organisation name: Mailchimp

Category of recipient: Email storage

Country the personal information is sent to: USA

How the transfer complies with UK data protection law: The country or sector has been assessed as providing adequate protection to data subjects (also known as Adequacy Regulations or UK data bridge)

How to complain

If you have any concerns about our use of your personal data, you can make a complaint to us using the contact details at the top of this privacy notice.

If you remain unhappy with how we've used your data after raising a complaint with us, you can also complain to the ICO.

The ICO's address:

Information Commissioner's Office

Wycliffe House

Water Lane

Wilmslow

Cheshire

SK9 5AF

Helpline number: 0303 123 1113

Website: https://www.ico.org.uk/make-a-complaint

Last updated

20th November 2025