



GENERAL PRIVACY NOTICE

Brent Irish Advisory Service takes your privacy seriously. It is important to us that you are aware of what we do with the personal information you provide to us, the reasons we collect it and what it means to you.

In this document, “we”, “us”, “our” and “ours” refers to the charity Brent Irish Advisory Service (BIAS). Your information is held by BIAS Trustees, who run the charity. Your information is gathered and managed by BIAS staff.

We are: Brent Irish Advisory Service, Address: 379-381 High Rd, Willesden, NW10 2JR, Phone Number: 0208 459 6655, email: info@biasbrent.co.uk

1. The information we collect about you

Everything you tell us will be treated confidentially, unless it is in our vital or legitimate interests to share it with a third party, in which case you will be informed.

We will gather:

- Data to identify you, including your contact information (phone/email/postal address).
- Your gender, marital status, date of birth and your ethnicity and other special-category sensitive information (either for anonymised monitoring purposes or to provide you with a service); provision of this data is optional.
- Any other information which you have consented to us using.

2. When we collect your information

We collect information you give us on initial contact and subsequently where information is required to further the needs of the situation (e.g. casework).

3. How we use your information and the legal basis we use

BIAS uses the following legal bases for processing your personal data:

- Legitimate interests: the processing is necessary for BIAS’s legitimate interests or the legitimate interests of a third party (e.g. to complete casework on your behalf).

- Consent: you have given explicit consent for BIAS to process personal data deemed sensitive, e.g. ethnicity, criminal record (this can be withdrawn at any time).
- Contract: the processing is necessary for a contract you have entered into with BIAS (e.g. an employment contract).
- Legal obligation: the processing is necessary for BIAS to comply with the law (e.g. to carry out complaint investigations).
- Vital interests: the processing is necessary for safeguarding reasons.

4. How we store your information

We hold and update your information on a secure online portal managed by **Lamplight Database Systems**, PO Box 79236, Lamplight Hq, London, NW26 9RG. Access to your information is by secure password and is restricted to the BIAS staff with whom you are engaged or who manage the database. Lamplight Database Systems is compliant with the General Data Protection Regulation (GDPR). BIAS is satisfied that your online information remains confidential to BIAS staff only and is held very securely. Paper copies of your data may also be stored. These will be securely held under lock and key, with access by authorised BIAS staff.

5. Data control and data processing

Unless otherwise listed, the **Brent Irish Advisory Service** is the Data Controller. The Data Processors are:

- Brent Irish Advisory Service
- Lamplight Database Systems (see point 4)
- Microsoft Corporation Ltd.

The Data Protection Officer at the Brent Irish Advisory Service is the Operations Manager (Suzanne Boraston).

6. Who we share your information with

When providing our service to you, we may share your information with:

- Your authorised representatives;
- Third parties with whom we need to share your information in order for us to carry out the BIAS service you have requested;
- Statutory, regulatory and law enforcement bodies, where BIAS has a legal obligation to share your information, such as where a court of law orders a data disclosure from us.

BIAS will only share information that is necessary and relevant and only to organisations which are GDPR-compliant. If we refer you to another organisation, we may – with your consent – share information, so that the agency to which you are referred can help you more quickly.

7. How long we hold your data

If you enter into a client relationship with BIAS, BIAS will hold your information for as long as required by legislation and regulation, following which the data will be securely erased from our databases. This will usually be for 6 years. Where you are involved in a serious complaint or dispute with BIAS, data will be held for a further 6 years following the resolution of the complaint or dispute.

8. If you do not provide your data to BIAS

If you do not provide any required information, BIAS may not be able to provide or continue to manage the relevant advice, advocacy, support, information, recruitment or employment service you request.

9. Processing your information outside the UK/EU

BIAS email system is provided by Microsoft, the head office of which is based outside the UK/EU. Microsoft holds EU-US Privacy Shield certification, which meets GDPR requirements for processing external to the EU. BIAS may require to email some or all of your information to providers through this medium.

10. Data subject rights

In line with the GDPR, you have:

- the right to be informed about the collection and the use of your personal data
- the right to access personal data and supplementary information
- the right to have inaccurate personal data rectified, or completed if it is incomplete
- the right to erasure (to be forgotten) in certain circumstances
- the right to restrict processing in certain circumstances
- the right to data portability, which allows you to obtain and reuse your personal data for your own purposes across different services
- the right to object to processing in certain circumstances
- the right to withdraw consent at any time, where our processing is based on consent only.

11. Recruitment-related data

If you apply to work with BIAS as an employee or volunteer, your data will be stored by Microsoft Corporation Ltd. and processed by BIAS for recruitment purposes only. Following the conclusion of a recruitment procedure, data on unsuccessful candidates will be stored for six months.

Data on employees who leave BIAS's employment will be stored as follows:

- working time and payroll records: three years following termination of employment
- personal data, performance appraisals and employment contracts: six years following termination of employment.

Data on volunteers who leave BIAS's employment will be stored as follows:

- personal data and DBS disclosures: six months following termination of volunteer service
- accident and incident records: three years following termination of volunteer service

- training records: six years following termination of volunteer service.

BIAS may collect special-category data during recruitment procedures, in line with our equity, diversity and inclusion policy. Any such data will be collected separately and anonymously, and will have no bearing on recruitment decisions. Provision of special-category data will be optional and consent to collect and process it will be requested from the candidate.

12. Contact information

Should you wish to exercise any of the rights set out in this policy or complain about our data handling, or should you have any questions about how we use your information, please contact the BIAS Director or Data Protection Officer (Suzanne Boraston) on 020 8459 6655 or email your request to them at info@biasbrent.co.uk.

You will receive an acknowledgement of your message within 5 working days, and BIAS will action your request within 30 days following acknowledgement. If there is any delay, you will be informed of the reason why and of the timeline for receiving a response.