

# Privacy Policy



## The Parasol Project customer privacy notice

This privacy notice tells you what to expect us to do with your personal information.

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### Contact details

#### Post

The Parasol Project, Tower Playbase, Maltfield Road, Headington, OXFORD, OX3 9RG, GB

#### Telephone

01865 742816

#### Email

info@parasolproject.org

### What information we collect, use, and why

We collect or use the following information to **provide services and goods, including delivery and third party referrals**:

- Names and contact details
- Gender
- Pronoun preferences
- Addresses
- Date of birth

- Emergency contact details
- Photographs or video recordings
- Health information (including medical conditions, test results, allergies, medical requirements and medical history)
- Dietary information (including allergies and health conditions)
- Information about care needs (including disabilities, home conditions, dietary requirements and general care provisions)
- Information about work, home and living conditions
- Information about support requirements
- Information about lifestyle, interests or personal history
- Criminal offence data
- Records of meetings and decisions
- Information about income and financial needs for funding or personal budget support
- Payment details (including card or bank information for transfers and direct debits)
- Website user information (including user journeys and cookie tracking)
- Information relating to compliments or complaints

We also collect or use the following information to **provide services and goods, including delivery and third party referrals**:

- Racial or ethnic origin
- Religious or philosophical beliefs
- Health information

We collect or use the following information to **receive donations or funding and organise fundraising activities**:

- Names and contact details
- Addresses

- Payment or banking details
- Donation history
- Health information
- Tax payer information (for Gift Aid purposes)

We also collect or use the following information to **receive donations or funding and organise fundraising activities**:

- Racial or ethnic origin
- Religious or philosophical beliefs
- Health information

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

- Names and contact details
- Addresses
- Marketing preferences
- Recorded images, such as photos or videos
- Website and app user journey information
- Records of consent, where appropriate

We collect or use the following personal information to **comply with legal requirements**:

- Name
- Contact information
- Identification documents
- Health and safety information
- Criminal offence data

We collect or use the following personal information for **recruitment purposes**:

- Contact details (eg name, address, telephone number or personal email address)

- Date of birth
- National Insurance number
- Copies of passports or other photo ID
- Employment history (eg job application, employment references or secondary employment)
- Education history (eg qualifications)
- Right to work information
- Details of any criminal convictions (eg Disclosure Barring Service (DBS), Access NI or Disclosure Scotland checks )

We also collect or use the following information for **recruitment purposes**:

- Racial or ethnic origin
- Religious or philosophical beliefs
- Health information

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

- Names and contact details
- Address
- Witness statements and contact details
- Relevant information from previous investigations
- Customer or client accounts and 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 information for **dealing with queries, complaints or claims**:

## 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 lawful bases 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 in brief set out 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. [You can read more about this right here.](#)
- **Your right to rectification** - You have the right to ask us to correct or delete personal information you think is inaccurate or incomplete. [You can read more about this right here.](#)
- **Your right to erasure** - You have the right to ask us to delete your personal information. [You can read more about this right here.](#)
- **Your right to restriction of processing** - You have the right to ask us to limit how we can use your personal information. [You can read more about this right here.](#)
- **Your right to object to processing** - You have the right to object to the processing of your personal data. [You can read more about this right here.](#)
- **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. [You can read more about this right here.](#)
- **Your right to withdraw consent** – When we use consent as our lawful basis you have the right to withdraw your consent at any time. [You can read more about this right here.](#)

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 and goods, including delivery and third party referrals** 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.
- Contract – we have to collect or use the information so we can enter into or carry out a contract with you. All of your data protection rights may apply except the right to object.
- • 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:
  - Our legitimate interest in collecting and using personal information (such as contact details, support needs, health details) is to ensure the young people who use our services are contactable (via caregivers when under 18), supported appropriately, and their medical needs and allergies are catered for. In an emergency, we need adequate information to be able to safely perform first aid if appropriate, pass on relevant information to emergency services or health professionals, and be able to contact the child's parent/carer/emergency contact.
- 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 to **receive donations or funding and organise fundraising activities** 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.
- Contract – we have to collect or use the information so we can enter into or carry out a contract with you. All of your data protection rights may apply except the right to object.
- • 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:

- Our services are funded under the conditions that we provide our funders (some governmental, some private) with certain personal information about users so that they can monitor demographics being served.

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.
- Contract – we have to collect or use the information so we can enter into or carry out a contract with you. All of your data protection rights may apply except the right to object.

Our lawful bases for collecting or using personal information to **comply with legal requirements** are:

- 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.
- 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.
- Public task – we have to collect or use your information to carry out a task laid down in law, which the law intends to be performed by an organisation such as ours. All of your data protection rights may apply, except the right to erasure and the right to portability.

Our lawful bases for collecting or using personal information for **recruitment 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.
- Contract – we have to collect or use the information so we can enter into or carry out a contract with you. All of your data protection rights may apply except the right to object.

- **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.

Our lawful bases for collecting or using personal information for **dealing with queries, complaints or claims** 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.
- **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.
- **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.
- **Public task** – we have to collect or use your information to carry out a task laid down in law, which the law intends to be performed by an organisation such as ours. All of your data protection rights may apply, except the right to erasure 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
- Schools, colleges, universities or other education organisations
- Previous employers (prospective Parasol staff)

## How long we keep information

We retain personal data only for as long as is necessary to fulfil the purposes for which it was collected, including to comply with legal, regulatory, or contractual obligations, resolve disputes, and enforce our agreements. After these purposes are fulfilled, we securely delete or anonymize personal data.



See Appendix 1 for an outline of the specific retention periods for different categories of data.

## Who we share information with

### Others we share personal information with

- Care providers
- Organisations we need to share information with for safeguarding reasons
- Emergency services
- Professional advisors
- Local authorities or councils
- Relevant regulatory authorities
- External auditors or inspectors
- Organisations we're legally obliged to share personal information with
- Publicly on our website, social media or other marketing and information media

## 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>

## Appendix 1: Data retention schedule

### Services

Type	Retention period	Where is the data stored?	How is the data kept up-to-date?	Method of deletion
Personal information of service users and carers, such as name, DOB, contact information, attendance information	3 years (at least)	Digital information stored in Google Drive* and Microsoft Azure SQL Server*. Paper copies of referral forms stored in locked office. Registration forms stored in locked filing cabinet in locked office.  *end-to-end encrypted, encrypted at rest, configured so cloud data remains within UK/EU servers	Information update requests sent every two years to all service users with reg forms over a year old. Information is updated by us whenever we speak to CYP/parents and discover it needs updating.	Paper form: shredded Deletion of cloud records
Sensitive personal information of service users, such as gender, ethnicity, health information, financial information, safeguarding concerns, photos of CYP for internal use	3 years (at least)	Digital information stored in Google Drive* and Microsoft Azure SQL Server*. Paper copies of referral forms stored in locked office. Registration forms stored in locked filing cabinet in locked office.  *end-to-end encrypted, encrypted at rest, configured so cloud data remains within UK/EU servers	Information update requests sent every two years to all service users with reg forms over a year old. Information is updated by us whenever we speak to CYP/parents and discover it needs updating.	Paper form: shredded Deletion of cloud records
Safeguarding concerns	10 years (at least) after CYP turns 18 years old	Stored in local hard drive with monthly backups on to password protected, encrypted drive. Safeguarding minutes stored in locked office.	N/A	Paper form: shredded Deletion of cloud records
Names of people involved with complaint (could be staff, CYP, parents, other organisations, etc.) and details of complaint	3 years (at least)	Digital information stored in Google Drive* and Microsoft Azure SQL Server*. Paper forms stored in locked filing cabinet in locked office.  *end-to-end encrypted, encrypted at rest, configured so cloud data remains within UK/EU servers	N/A	Paper form: shredded Deletion of cloud records
Names of people involved with accident/incident and details of accident/incident	40 years (at least)	Digital information stored in Google Drive* and Microsoft Azure SQL Server*. Paper forms stored in locked filing cabinet in locked office.  *end-to-end encrypted, encrypted at rest, configured so cloud data remains within UK/EU servers	N/A	Paper form: shredded Deletion of cloud records

### Employment

Type	Retention period	Where is the data stored?	How is the data kept up-to-date?	Method of deletion
Personal information of staff and prospective staff, such as name, DOB, contact information, employment history	6 years after staff member has left (at least)	Digital information stored in Google Drive* and Microsoft Azure SQL Server*. Staff applications stored in locked filing cabinet in locked office.  *end-to-end encrypted, encrypted at rest, configured so cloud data remains within UK/EU servers	Staff are informed that they should update us with any new information. Additionally all information will be reviewed when DBS needs renewing every 2 years.	Paper form: shredded Deletion of cloud records


Sensitive personal information of staff, such as gender, ethnicity, health information	6 years after staff member has left (at least)	Digital information stored in Google Drive* and Microsoft Azure SQL Server*. Staff applications stored in locked filing cabinet in locked office.  *end-to-end encrypted, encrypted at rest, configured so cloud data remains within UK/EU servers	Staff are informed that they should update us with any new information. Additionally all information will be reviewed when DBS needs renewing every 2 years.	Paper form: shredded Deletion of cloud records
Wage records, payroll information	6 years after staff member has left (at least) Xero data: 7 years after subscription is terminated	Digital information stored in Google Drive* and Xero accounting software.  *end-to-end encrypted, encrypted at rest, configured so cloud data remains within UK/EU servers	N/A	Xero: Xero's own policy Deletion of cloud records
Names of people involved with complaint (could be staff, CYP, parents, other organisations, etc.) and details of complaint	3 years (at least)	Digital information stored in Google Drive* and Microsoft Azure SQL Server*. Paper forms stored in locked filing cabinet in locked office.  *end-to-end encrypted, encrypted at rest, configured so cloud data remains within UK/EU servers	N/A	Paper form: shredded Deletion of cloud records
Names of people involved with accident/incident and details of accident/incident	40 years (at least)	Digital information stored in Google Drive* and Microsoft Azure SQL Server*. Paper forms stored in locked filing cabinet in locked office.  *end-to-end encrypted, encrypted at rest, configured so cloud data remains within UK/EU servers	N/A	Paper form: shredded Deletion of cloud records
Certificates, training information, appraisal notes, etc	6 years after staff member has left (at least)	Digital information stored in Google Drive* and Microsoft Azure SQL Server*. Paper forms stored in locked filing cabinet in locked office.  *end-to-end encrypted, encrypted at rest, configured so cloud data remains within UK/EU servers	Training is tracked and updated according to individual training policies	Paper form: shredded Deletion of cloud records

## Marketing

Photos of service users	Social media: indefinite Website: refresh every 3 years Storing for funding and reporting purposes: 3 years	Google Drive*, Facebook, website  *end-to-end encrypted, encrypted at rest, configured so cloud data remains within UK/EU servers	N/A	Deletion of cloud records
Photos of staff	Social media: indefinite Website: refresh every 3 years Storing for funding and reporting purposes: 3 years	Google Drive*, Facebook, website  *end-to-end encrypted, encrypted at rest, configured so cloud data remains within UK/EU servers	N/A	Deletion of cloud records

## Operations and Accounts

Type	Retention period	Where is the data stored?	How is the data kept up-to-date?	Method of deletion
Annual accounts	6 years from end of FY to which they apply (at least)	Published on Charity Commission website. Digital information stored in Google Drive* and paper report stored in locked office.  *end-to-end encrypted, encrypted at rest, configured so cloud data remains within UK/EU servers	N/A	Paper form: recycled Deletion of cloud records
AGM and any other official minutes	6 years (at least)	Digital information stored in Google Drive* and paper minutes stored in locked office.  *end-to-end encrypted, encrypted at rest, configured so cloud data remains within UK/EU servers	N/A	Paper form: recycled Deletion of cloud records

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<b>Sign-off Manager Name:</b>	Daniel Norey
<b>Sign-off Manager Signature:</b>	
<b>Notes:</b>	ICO Privacy Notice Tool  <a href="https://ico.org.uk/for-organisations/advice-for-small-organisations/create-your-own-privacy-notice/">https://ico.org.uk/for-organisations/advice-for-small-organisations/create-your-own-privacy-notice/</a>