

# Centre for Policy on Ageing

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## Privacy Notice

### About this document

This privacy notice sets out how The Centre for Policy on Ageing collects, uses and shares your personal data and how we use that information, it explains the legal basis for this and your rights in relation to the personal data we hold. The Centre for Policy on Ageing (a company incorporated in England and Wales with company number 00440135, and registered charity number 207163) is the Data Controller for the purposes of the General Data Protection Regulations (GDPR), with effect from 25 May 2018, and any subsequent UK legislation covering data protection.

The Centre for Policy on Ageing (a company incorporated in England and Wales with company number 00440135, and registered charity number 207163) is the data controller of your personal data and is subject to the General Data Protection Regulation (the **GDPR**) with effect from 25 May 2018.

### How we collect your information

We may collect your personal data in a number of ways, whenever you contact us or have any involvement with us, for example:

- when you communicate with us by telephone, SMS, email or via our website or our social media channels, or post
- visit our website (see cookies policy)
- create or update a profile
- sign up to receive news about our activities
- attend a meeting with us and provide us with information
- take part in our events

Where you provide us with personal data relating to others, we understand that you are authorised to provide that information to us, and that you have provided this Privacy Notice to them, as appropriate.

### **The types of information we collect**

The type and amount of information we collect depends on why you are providing it. We may collect the following types of personal data about you (and anyone at your organisation who we need to carry out due diligence checks on, for example):

- your contact details (including your name, organisation, role, email addresses, telephone numbers and postal addresses);
- your communication preferences;
- records of communications and interactions we have had with you, including information provided through our website (e.g. in online RSVP forms for events) or via social media;
- information concerning your engagement with us, including attendance at our events, responses to surveys or focus groups, records of meetings, etc.;
- technical data relating to your use of our website, collected through the use of cookies (see our separate Cookie Policy);

We may also collect sensitive personal data, including information concerning your health and medical conditions (e.g. disability and dietary needs), where you attend one of our events and we need to cater for your attendance.

If we lose touch with you over time, we may use external sources to ensure that our contact details for you are up to date, allowing us to continue to communicate with you about certain events and activities which may be of interest to you. If you do not wish the Centre to do this for you, please contact us using the details at the bottom of this document.

We may also use external sources, such as information you have publicly shared on social media, for the purpose of our monitoring and evaluating how the Centre's information has been used and will be best used in the future. In collecting this information, we are not intending to process it as your personal data so much as in an aggregated form for the Centre's statistical purposes.

## **How we use your information**

The purposes for which we may use personal data are all at their heart designed to further our charitable objectives, which are essentially to promote the interests of older people and later life issues through research, policy analysis and the dissemination of information. We will use your personal information in a number of ways which reflect the legal basis applying to the processing of data. These may include:

- providing you with the service or information you have asked for
- sending you the subscription based bi-monthly bulletin with your prior consent - New Literature on Old Age
- when necessary for carrying out your obligations under any contract between us
- conducting surveys, focus groups and other research
- seeking your views via online surveys on the services or activities we carry out so that we can make improvements
- maintaining our organisational records and ensuring we know how you prefer to be contacted
- administrative purposes, for example in connection with an event you have registered for or attended
- internal record-keeping, including the management of any feedback or complaints

## **The legal basis for processing your information and how we use it**

We may process your personal data because it is necessary for the performance of a contract with you or in order to take steps at your request prior to entering into a contract.

We may also process your personal data because it is necessary for our or a third party's legitimate interests. Our "legitimate interests" include our charitable objectives as briefly summarised above. In this respect, we may use your personal data for the following:

- where the purpose of our processing is the provision of information or services to you, we may also rely on the fact that it is necessary for your legitimate interests that we provide the information or service requested, and given you have made the request, would presume that there is no prejudice to you in our fulfilling your request;
- to monitor and evaluate the performance and effectiveness of our services;

- to seek advice on our rights and obligations, such as where we require our own legal advice;
- to keep you informed - by letter, telephone, email and other electronic means) of information, stories and news which may be of interest to you. (If you do not wish to receive such information, or if you wish to receive this information only by certain means of communication, please let us know now or at any time in the future, and your details will be removed from our mailing list or your communication preferences will be updated, as applicable.)

We may also process your personal data for our compliance with our legal obligations. In this respect, we may use your personal data for the following:

- to meet our compliance and regulatory obligations;
- for the prevention and detection of crime;
- in order to assist with investigations (including criminal investigations) carried out by the police and other competent authorities.

We may also process your personal data where:

- it is necessary to protect your or another person's vital interests (in very limited circumstances, essentially where this is a matter of life or death);
- it is necessary for the establishment, exercise or defence of legal claims (for example, to protect and defend our rights or property, and/or the rights or property of our grantees, partner organisations or scholars);
- we have your specific or, where necessary, explicit consent to do so.

### **Sharing your information with others**

For the purposes referred to in this privacy notice and relying on the bases for processing as set out above, we may share your personal data with certain third parties. We may disclose limited personal data to a variety of recipients including:

- our employees, agents and contractors where there is a legitimate reason for their receiving the information, including third parties where we have engaged them to process data on our behalf;
- internal and external auditors;

- when the Centre is legally required to do so (by a court, government body, law enforcement agency or other authority of competent jurisdiction), for example by the Charity Commission.
- analytics and search engines that help us to improve our website and its use.

### **International data transfers**

As a matter of course, since the Centre's activities are UK based we do not transfer your personal data outside of the European Economic Area. We may, however, transfer your personal data around the world on an *ad hoc* basis, for example where this is necessary for interaction with you, and you are located outside of the EEA. In such circumstances, we will consider whether any additional measures are required in order to give adequate protection for the information when it is transferred outside of the EEA.

### **Our use of 'cookies'**

Cookies are small pieces of information sent by a web server to a web browser, which enable the server to collect information from the browser. They are stored on your hard drive to allow our website to recognise you when you visit. For detailed information on the cookies we use please see our 'cookies policy'.

### **How long your information is kept**

We will retain your personal information for as long as it is necessary for the relevant activity. See our Data Retention Policy.

Where we rely on your consent to contact you for direct marketing purposes, we will treat your consent as lasting for as long as it is reasonable to do so. We may periodically ask you to renew your consent.

If you ask us to stop contacting you with marketing or fundraising materials, we will keep a record of your contact details and limited information needed to ensure we comply with your request.

### **Your rights**

Under the GDPR, with effect from 25 May 2018, you have the following rights in relation to our processing of your personal data. Please note that these rights are not absolute, and we may be entitled (or required) to refuse requests where exceptions apply.

- to obtain access to, and copies of, the personal data that we hold about you;
- to require us to correct the personal data we hold about you if it is incorrect;
- to require us to erase your personal data in certain circumstances;
- to require us to restrict our data processing activities in certain circumstances;
- to object, on grounds relating to your particular situation, to any of our particular processing activities where you feel this has a disproportionate impact on you;
- to receive from us the personal data we hold about you which you have provided to us, in a reasonable format specified by you, including for the purpose of you transmitting that personal data to another data controller; and
- where our processing is based on your consent, you may withdraw that consent, without affecting the lawfulness of our processing based on consent before its withdrawal.

*Note:* If you have given your consent and you wish to withdraw it, please contact us using the contact details below. Please note that where our processing of your personal data relies on your consent and where you then withdraw that consent, we may not be able to provide all or some aspects of our services to you and/or it may affect the provision of those services.

If you are not satisfied with how we are processing your personal data, you can raise a concern with the Information Commissioner. You can also find out more about your rights under data protection legislation from the Information Commissioner's Office website available at: [www.ico.org.uk](http://www.ico.org.uk).

### **Contact us**

If you have any queries about this privacy notice or how we process your personal data, or if you wish to exercise any of your rights under applicable law, you may contact our Director

- by telephone: 020 7553 6500
- or by post: the Director, Centre for Policy on Ageing, Tavis House, 1-6 Tavistock Square, London WC1H 9NA