



Policy P.3 Privacy Policy

Policy Number	P.3	Review Cycle	Twice yearly or as required	Author	
Lead Governor		Review date(s)	May 2020	CEO	
Signed:	Date:		May 2022		
Ratification at next Board meeting			May 2024		
Proprietor / CEO			May 2026		
Signed:	Date:		May 2028		

Privacy Statement

1. What is the purpose of this privacy statement?

This privacy statement tells you what to expect when APTCOO collects personal data. It applies to information we collect about:

- visitors to our website
- people who register for an on-line account
- people who register for and use our services
- people who are referred to us by other persons, agencies, organisations
- people who contact us with an enquiry or complaint
- job applicants and our current and former employees

2. What is personal data?

Personal data means any data which can be used to identify an individual (such as name and address) and any information that relates to that individual from which they can be identified (for instance, details of the services provided to a particular individual). The following types of personal data may be used:

- personal contact details such as name, address, phone number, etc. personal details such as an NHS number
- visual images, personal appearance and behaviour
- personal or professional opinions about an individual family details
- employment and education details
- student and pupil records
- housing needs
- lifestyle and social circumstances
- financial activity records
- health details
- racial or ethnic origin
- religious or other beliefs of a similar nature

3. What do we use personal data for?

We may need to use personal data for the following purposes:

Delivering services and support to customers and service users managing and monitoring those services service planning dealing with and investigation of enquiries and complaints responding to requests for information

When can we use your personal data?

Data protection law allows us to use or share personal data in any of the following circumstances:

With consent

- when we have your (or your appointed representative's) consent. For example, you may have indicated your consent on a paper form or online form on our website

Without consent

- where we have a contract with you or you have asked us to process your data prior to entering onto a contract
- where we are under a legal obligation that requires us to process your personal data
- we are protecting your vital interests, or those of other persons. For example, sharing details from your care record with a medical professional in an emergency
- where we have a legitimate need to use information for a special purpose that does unjustifiably infringe on your rights or freedoms
- where it is necessary for the performance of a law enforcement task
- where we have explicit consent
- where it is necessary for social care or health care purposes
- where it is necessary for the assessment of the working capacity of an employee
- where it is necessary for medical diagnosis
- where it is necessary for the vital interests of an individual and the individual is unable to consent because they are physically or legally incapable

Who may we share personal data with?

To ensure that that APTCOO provides you with an efficient and effective service we will sometimes need to share your information with other parties that support the delivery of the service you may receive:

- customers and service users
- family, associates or representatives of the person whose personal data we are processing healthcare, social and welfare organisations
- healthcare professionals
- mental health assessors
- care homes and care providers
- local and central government bodies
- adoption agencies
- housing associations and landlords
- voluntary and charitable organisations
- current past and prospective employers
- agency workers and contractors
- consultants
- trade unions
- professional bodies
- the disclosure and barring service
- service providers and other suppliers of goods and services
- buyers of goods and services
- professional advisers and consultants
- pensions regulators and pensions authorities
- employers participating in the local government pensions scheme
- credit reference agencies
- customs and excise
- ombudsman and regulatory authorities
- press and the media

- courts and tribunals
- legal representatives, defence solicitors
- law enforcement and prosecuting authorities
- police forces
- police complaints authority
- partner agencies, approved organisations and individuals working with the police
- schools and academies
- educators and examining bodies

Your rights

You can ask us whether we hold your personal data and you can request a copy of the information we hold.

Exceptions

Some of the information requested may be exempt from disclosure. This could be because it relates to another individual, it is subject to legal professional privilege, its disclosure would result in serious harm to someone, it consists of adoption records or another lawful exception applies.

Summary Exceptions

Right to withdraw your consent

- If you have provided us with consent for use of your data, for instance, marketing purposes, you have the right to withdraw your consent to stop the further use of your data for that purpose.
- The right to withdraw your consent will only affect future use of your data. It will not affect the validity of any pre-existing use.
- You may object in writing to us explaining why use of your data is likely to cause you unjustifiable damage or distress and what should be done to prevent this (please see our complaints policy).
- This right is not available where your data can be used without consent, for instance, where we are under a legal obligation to use your information or another lawful exception applies.
- Right to object to use of your personal data (until 25 May 2018, see below for new right to object after this date).
- Right to raise a concern or enquiry about use of your personal data.
- This right is not automatic and the use of your personal data for purposes you disagree with may be justified in certain cases even if it causes you some damage or distress.
- You may ask for your personal information to be corrected if information we hold is inaccurate or for incomplete information to be completed. This right may not be available in limited circumstances where a lawful exception applies.
- For the purposes of a contract that you have entered into with us.

Visitors to our website

What information do we collect when you visit our website?

- The computers which host our website maintain site logs which include the IP details of all machines accessing our pages. We only use such logs to determine website usage and not as a means of identifying or obtaining information about specific users. Any IP information is treated as strictly confidential and is not published or divulged to any third party.
- Information about cookies on our website
- Registering for online services

How do we use your personal information when you register for an online service?

- We collect personal data that you provide to us when you register for an online account. We collect personal data when you apply to access some of our services online.
- By registering with us online (either in relation to your account or a special service) you consent that APTCOO may process the personal data that we collect from you in accordance with this privacy notice.
- Where you give specific consent to allow us to be able to communicate and provide information about services appropriate to your needs.
- We will retain your information for the period necessary to fulfil the relevant purpose for which it is held and we will also retain any external verification so long as it remains accurate based on the information you provide to us. This will allow us to reuse that information when you register for additional services.

Photographic images

How will we use photographs that identify people?

- Images of individuals are treated as personal data; images of crowds in a public area are not.
- When taking photographs intended for publication on our website or elsewhere, it is our policy to seek the written permission of any individuals who are photographed.
- We will respond promptly to any request to remove photographic images and/or personal data from the website where the person making such a request has a right to do so in accordance with their data protection rights.

Links to other websites

How will other websites use your personal data?

This privacy statement does not cover the links within this site linking to other websites. We encourage you to read the privacy statements on other websites you visit.

Changes to this privacy statement

We keep our privacy statement under regular review.

Any changes we may make to our privacy statement in the future will be posted on this page. Please check back frequently to see any updates or changes to our privacy statement.

This privacy statement was drafted with brevity and clarity in mind. It does not provide exhaustive detail of all aspects of Nottinghamshire County Council's collection and use of personal data. However, we are happy to provide any additional information or explanation needed. Any request for this should be sent to the Complaints and Information Team.

Privacy Notices in relation to specific activities

Where can I find further information about the use of my personal data?

APTCCO may use your personal data for the purposes of providing you with specific services. Some of these services have their own privacy notices which provide you with more detailed information relating to how we use your information.

Contacts

If you have any enquires in relation to this policy, please contact **Chief Executive Officer** who will also act as the contact point for any subject access requests.

Further advice and information is available from the Information Commissioner's Office, www.ico.org.uk or telephone 0303 123 1113.

Policy / procedure for: P.3 Privacy Policy

RECORD OF CHANGES

DATE	AUTHOR	PROCEDURE	DETAILS OF CHANGE