

Privacy Notice

Introduction

This Privacy Notice explains in detail the types of personal data we may collect about you when you interact with us. It also explains how we'll store and handle that data and keep it safe.

We know that there's a lot of information here, but we want you to be fully informed about your rights, and how Frontline uses your data.

We hope the following sections will answer any questions you have but if not, please do get in touch with us.

It's likely that we'll need to update this Privacy Notice from time to time. We'll notify you of any significant changes, but you're welcome to come back and check it whenever you wish.

Who is Frontline?

Frontline Debt Advice UK offers debt and benefit advice from various offices across southern England. The full list of branches and their contact details can be found on our website:

<https://frontlinedebtadvice.org.uk/find/>

In this document, we are referred to collectively as "Frontline". Frontline is authorised and regulated by the Financial Conduct Authority (FRN: 694921). We are a charity registered with the Charities Commission in England under registration number 114908. We take our obligations in relation to the use and security of your personal information seriously. This document constitutes our Privacy Notice to you.

If you have any questions about this Notice, please email us at admin@frontlinedebtadvice.org or write to us c/o Three Counties Church, Haslemere Locality Office, Lion Green, Haslemere, Surrey, GU27 1LD.

Frontline's Information Commissioner's Office registration number is Z2653290.

What Services do Frontline Provide?

We are a charitable, not for profit organisation who provide an independent debt and benefit advice service to members of our community.

Why we Process Your Information?

The law on data protection sets out a number of different reasons for which an organisation may collect and process your personal data, including:

In specific situations, we require your data to pursue our legitimate interests in a way which might reasonably be expected as part of running our service and which does not materially impact your rights, freedom or interests. This would include obtaining sufficient information

from you so that we can evaluate your position and give you appropriate advice, or where we maintain a record of donors who support our services.

If the law requires us to, we may need to collect and process your data. This is particularly key as we are regulated by the Financial Conduct Authority and we need to be capable of discharging our obligations, not just to our clients but to our regulator. The same is true in relation to keeping more detailed records of donors who have taken advantage of Gift Aid to enhance their donations to us.

Where you have **consented**. When collecting your personal data, we'll always make clear to you which data is necessary in connection with a particular service. Primarily, this relates to when a client discloses health information which may be relevant to the advice they are seeking from us. We will only collect information if it's relevant to helping you with your case and will only disclose it with your consent.

When do we collect your information?

- When you ask one of our staff to email you information about our services.
- When you contact us by any means with queries, complaints etc.
- When you book any kind of appointment with us.
- When you fill in any forms, for example, if you complete an application or donation form.
- When you've given a third-party permission to share with us the information they hold about you. For example, allowing us to liaise with one or more of your creditors or social services.

We also collect data from publicly available sources (such as Land Registry) when you have given your consent to share information or where the information is made public as a matter of law.

It should be noted that Frontline operate from community spaces, i.e. we are located in community centres and churches which we do not own. The owners of some of these community spaces may have CCTV installed, and we have no control or access to it. Should you have any concerns about the use of CCTV at a venue when you visit, we will be happy to direct you to the person who has responsibility for it.

What Information do we hold about you with respect to our Services?

We only ask for information to help us give advice regarding your problem.

You may submit information to us in any written form (for example, by post, fax or email), or verbally through telephone calls or through face-to-face meetings. If information is conveyed to us verbally, it will be reduced to a written form so that we can make a record of the contact. We are committed to ensuring that the information we collect and retain about you will always be adequate, relevant and not excessive.

Where you are seeking advice, we will take information from you to enable us to understand your circumstances and provide the advice. The information requested from you will depend on your personal circumstances, but may include your personal details, family details, lifestyle and social circumstances, membership details, goods and services, financial details, education and employment details.

Where it is relevant to your personal circumstances, we may process personal information which falls within a “special category” (i.e. information relating to racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning a person’s sex life or sexual orientation). If we process any of these special categories, we will seek your explicit consent for it to be kept and used as part of the services that we render to you. You may withdraw your consent to the processing of special category data at any time; however it may mean that it will become necessary to revise the advice or course of action that has been taken previously.

In addition to the information that you provide to us, we may also utilise personal information that originates from publicly accessible sources.

What Information do we hold about you with respect to Donations?

Information relating to any donation made by you will be retained. This will include your name, your address, and method of payment (which may include your banking details if you are paying periodic subscriptions by direct debit). If you make an online payment, your payment details will be processed by the payment service provider rather than ourselves.

Who your information may be shared with

We share the personal information we process with you and also with other organisations on a ‘need to know’ basis. What follows is a description of the types of organisations and persons with whom it may be necessary or required to share information with:

- representatives of the person whose personal information we are processing
- employees and volunteers of Frontline
- your current, past and prospective employers
- healthcare, social and welfare organisations
- educators and examining bodies
- financial organisations associated with you
- employment and recruitment agencies
- business associates and professional adviser
- providers of goods and services, including providers of payment services who are used to process any donations that you make
- local and central government
- regulatory bodies
- other voluntary and charitable organisations

We do not share or disclose any of your personal data without your consent, other than for the purposes specified in this notice or where there is a legal requirement. We use some third parties to provide the services and business functions such as online payment processors. All our processors acting on our behalf process your personal data in accordance with our instructions and they comply fully with this privacy notice and the data protection laws.

International Transfers of Personal Data

Our activities are limited to the United Kingdom, so the circumstances where we need to transfer personal information overseas are limited to where either you, or a person with whom you have a relationship (for example a creditor) is located outside of the United Kingdom. We may also use third party service providers who are located outside of the United Kingdom. Before we pass information outside of the United Kingdom, we are required to ensure that we comply with the UK General Data Protection Regulations with respect to securing your information prior to its transmission.

Your Rights in Connection with the Information We Process Relating to You

As an individual, you have a number of rights that you can exercise in relation to the information we process for you. These are:

1. The right to be informed of what we do, plan to do, or have done with your information;
2. The right of access to the information that we have about you;
3. The right to rectification, where information that we hold is not correct;
4. The right to erasure;
5. The right to restrict processing;
6. The right to data portability - you can request that we give you back information that you
7. have provided to us in a machine readable format

We do not utilise processes that involve automated decision making or profiling.

Exercising your Rights

If you wish to exercise any of your rights, please contact your adviser.

In certain circumstances, you will not be able to exercise your rights either at all or completely, as it needs to be balanced against our legal or regulatory obligation to maintain complete records or certain elements of your records. Should you wish to exercise any right, and we are unable to comply with that request, you will be informed accordingly.

Marketing

Our marketing activities comprise of the publication of occasional newsletters. Should you not wish to receive these, please let us know and we will remove you from any mailing list.

Record Retention

Whenever we collect or process your personal data, we'll only keep it for as long as is necessary for the purpose for which it was collected. We will maintain your records for six years from the end of our relationship with you so that we can meet our regulatory and legal obligations. This retention may be extended, if we are obliged to do so by an entity that has authority over us, for example the Financial Conduct Authority or HM Revenue and Customs.

How to complain

If you wish to make a complaint about how we process your personal data, please contact dataprotection@frontlinedebtadvice.org.uk.

We will handle your complaint in accordance with our complaints process and acknowledge, investigate and respond to your complaint as required by UK data protection law.

If you remain dissatisfied with the outcome of your complaint, or otherwise wish to do so, you have the right to lodge a complaint with the Information Commissioner's Office (ICO).

You can contact them by calling 0303 123 1113 or go online to www.ico.org.uk/concerns (opens in a new window; please note we can't be responsible for the content of external websites)

Changes to this Notice

We periodically review our policies and procedures to ensure they are up to date. You will be made aware upon any material changes being made here.