



## **Consultants and Third Parties Privacy Notice**

This privacy policy sets out how Thrive Women's Aid uses and protects any information that you give the organisation when we purchase your services or do business with you.

Thrive Women's Aid is committed to being transparent about how it collects and uses that data and to ensuring that your privacy is protected.

### **What information does Thrive Women's Aid collect?**

Thrive Women's Aid may collect and process a range of information about you. This includes:

- Name, address and contact details including email address and telephone number;
- Names and contact details of other employees within your organisation that we do business with;
- Bank account details;
- Details of your qualifications, skills, experience and references;
- Details of relevant insurances you possess;
- In some cases; details of your recent disclosure and barring service (DBS) check;
- When we hold virtual meetings we will capture your image via video conferencing. We may record meetings for the purpose of minute taking – we will always inform you when we are going to do this so that you may turn off your camera. The recordings will only be shared with Board members and Thrive Staff members; and
- When you visit our premises which have CCTV systems operating for the security of service users, visitors and staff. These systems may record your image during your visit.

Thrive Women's Aid may collect this information in a variety of ways. For example, data might be collected through tender applications or forms; quotes; invoices; purchase orders; contracts; service level agreements; from correspondence with you; or through interviews, meetings, or other assessments.

In some cases, Thrive Women's Aid may collect personal data about you from third parties, such as references supplied by former employers or customers and information from criminal records checks permitted by law.

Data will be stored in a range of different places, including on the organisations secure shared server, in Thrive Women's Aid's payroll and online banking systems and in other IT systems (including Thrive Women's Aid's email system).

## **Why does Thrive Women's Aid process personal data?**

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

### Consent:

In specific situations, Thrive Women's Aid can collect and process your data with your consent.

For example, when you tick a box to receive email newsletters, or when you sign a consent form.

When collecting your personal data, we'll always make clear to you when you can consent to this information being collected and processed, as well as how you withdraw this consent.

### Contractual:

Thrive Women's Aid needs to process data to enter into a contract with you and to meet its obligations under your that contract. For example, it needs to process your data to pay you in accordance with the contract or service level agreement.

Thrive Women's Aid may also need to process your data to meet its contractual obligations within funding arrangements that supports our work.

### Legal compliance:

In some cases, Thrive Women's Aid may need to process data to ensure that it is complying with its legal obligations. For example, to comply with health and safety laws or we can pass on details of people involved in fraud or other criminal activity affecting the organisation to law enforcement.

### Legitimate interest:

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 organisation and which does not materially impact your rights, freedom or interests. Thrive Women's Aid has a legitimate interest in processing personal data directly before, during, and a reasonable time after the contract has ended.

## **What we do with the information we gather?**

We require this information to understand what service you provide and ensure this is effective for our work, and in particular for the following reasons:

- To pay you as agreed within the contract or service level agreement.

- Communicate with you and your employees to ensure contractual compliance.
- Internal record keeping.
- To analyse services and monitor their effectiveness moving forward.
- To assess your suitability, credentials and ability to deliver the service safe and appropriate services.
- To safeguard our service users, potential service users, volunteers and employees.
- To provide references or testimonials of your work to prospective clients on your behalf.
- Operate and keep a record of complaints to ensure acceptable conduct within the organisation.

### **Who has access to data?**

Your information may be shared internally, including HR, members of the Board of Trustees, the finance team, managers and other members of staff if this is necessary in the performance of their role.

Thrive Women's Aid shares your data with third parties in order to obtain pre-contract references from other employers or organisations, obtain employment background checks from third-party providers and obtain necessary criminal records checks from the Disclosure and Barring Service. Thrive Women's Aid may also share your data with third parties that provide IT support on behalf of the organisation if this is necessary in the performance of the contract.

Thrive Women's Aid may also share your data with third parties that process data on its behalf, in connection with finance and payments.

When using video conferencing, your data will be processed by the video conferencing provider. Thrive will ensure that any providers used are GDPR compliant.

If we transfer your personal information to another country, we'll take appropriate measures to protect your privacy and the personal information we transfer.

### **How does Thrive Women's Aid protect data?**

Thrive Women's Aid takes the security of your data seriously. Thrive Women's Aid has internal policies and controls in place to try to ensure that your data is not lost, accidentally destroyed, misused or disclosed, and is not accessed except by its employees in the performance of their duties.

Where Thrive Women's Aid engages third parties to process personal data on its behalf, they do so on the basis of written instructions, are under a duty of confidentiality and are obliged to implement appropriate technical and organisational measures to ensure the security of data.

## **For how long does Thrive Women's Aid keep data?**

Thrive Women's Aid will hold your personal data for the duration of the contract and for 1 year thereafter to be able to respond effectively to invoices; reference requests and further commissioned work.

Where the law requires us to, we will hold your data for longer for example; assessments under health and safety regulations.

## **Your rights**

As a data subject, you have a number of rights. You can:

- access and obtain a copy of your data on request;
- require Thrive Women's Aid to change incorrect or incomplete data;
- require Thrive Women's Aid to delete or stop processing your data, for example where the data is no longer necessary for the purposes of processing; and
- object to the processing of your data where Thrive Women's Aid is relying on its legitimate interests as the legal ground for processing.

If you would like to exercise any of these rights, please contact **Data Protection Officer:** Lucy Reynolds c/o Thrive Women's Aid, PO Box 20, Port Talbot SA13 1AA. Telephone 01639 894864 email: [lucyr@thrivewa.org.uk](mailto:lucyr@thrivewa.org.uk)

## **Checking your identity**

To protect the confidentiality of your information, we will ask you to verify your identity before proceeding with any request you make under this Privacy Notice. If you have authorised a third party to submit a request on your behalf, we will ask them to prove they have your permission to act.

## **Contacting the Regulator**

If you feel that your data has not been handled correctly, or you are unhappy with our response to any requests you have made to us regarding the use of your personal data, you have the right to lodge a complaint with the Information Commissioner's Office.

You can contact them by calling 0303 123 1113.

Or go online to [www.ico.org.uk/concerns](http://www.ico.org.uk/concerns) (opens in a new window; please note we can't be responsible for the content of external websites)

## **What if you do not provide personal data?**

You are under no statutory or contractual obligation to provide data to Thrive Women's Aid during the recruitment of your services. However, if you do not provide the

information, Thrive Women's Aid may not be able to process your application properly or at all.

Certain information, such as contact and payment details, have to be provided to enable Thrive Women's Aid to enter a contract or service level agreement with you. If you do not provide other information, this will hinder Thrive Women's Aid's ability to administer the rights and obligations arising as a result of the contract or business relationship.

### **Amendments**

This privacy policy may be amended from time to time consistent with the requirements of the General Data Protection Regulation. You can find the most up to date version of this document on our website - [www.thrivewomensaid.org.uk](http://www.thrivewomensaid.org.uk)