



GDPR: DATA PRIVACY NOTICE FOR CLIENTS OF IMAGINE AND GROW

Introduction

Noah's Ark Family Project ("We") are committed to protecting and respecting your privacy.

This policy, together with our 'Terms & Conditions' (which can be found at <http://www.noahsarkfamilyproject.com/terms-and-conditions> and any other documents referred to on it, sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us. Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it.

The rules on processing of personal data are set out in the General Data Protection Regulation (the "GDPR").

1. Definitions

Data controller - A controller determines the purposes and means of processing personal data.

Data processor - A processor is responsible for processing personal data on behalf of a controller.

Data subject – Natural person

Categories of data: Personal data and special categories of personal data

Personal data - The GDPR applies to 'personal data' meaning any information relating to an identifiable person who can be directly or indirectly identified in particular by reference to an identifier (as explained in Article 6 of GDPR). For example, name, passport number, home address or private email address. Online identifiers include IP addresses and cookies.

Special categories personal data - The GDPR refers to sensitive personal data as 'special categories of personal data' (as explained in Article 9 of GDPR). The special categories specifically include genetic data, and biometric data where processed to uniquely identify an individual. Other examples include racial and ethnic origin, sexual orientation, health data, trade union membership, political opinions, religious or philosophical beliefs.

Processing - means any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

Third party - means a natural or legal person, public authority, agency or body other than the data subject, controller, processor and persons who, under the direct authority of the controller or processor, are authorised to process personal data.

2. Who are we?

Noah's Ark Family Project is the data controller. This means we decide how your personal data is processed and for what purposes. Our contact details are: enquiries@noahsarkfamilyproject.com. For all data matters, contact us using this email address.

3. The purpose(s) of processing your personal data

We use your personal data for the following purposes:

- i. To maintain a working record of the client's name, contact details, services used, and progress, in accordance to the service provided.
- ii. To be able to tailor our services in accordance to specific medical needs of the client; for example, physical impairments that may make using a device for web/phone calls difficult, or mental illness which could elevate risk to the client.

4. The categories of personal data concerned

With reference to the categories of personal data described in the definitions section, we process the following categories of your data:

- Personal data; client name, personal email address, contact telephone/mobile number, home address.
- Special categories of data; racial and ethnic origin, sexual orientation, health data.

We have obtained your personal data from our pre-service questionnaire, according to your required service and only the information you have chosen to provide will remain on our records.

5. What is our legal basis for processing your personal data?

a) Personal data (article 6 of GDPR)

Our lawful basis for processing your general personal data:

<input checked="" type="checkbox"/> Consent of the data subject;	Our Booking /Referral Consent Form can be found at www.noahsarkfamilyproject.com/registration
<input checked="" type="checkbox"/> Processing necessary for the performance of a contract with the data subject or to take steps to enter into a contract	Contract of service provision and payment against delivery of service.
<input type="checkbox"/> Processing necessary for compliance with a legal obligation	N/A
<input checked="" type="checkbox"/> Processing necessary to protect the vital interests of a data subject or another person	Information used for the purpose of safeguard, where required.
<input type="checkbox"/> Processing necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller	N/A
<input checked="" type="checkbox"/> Processing necessary for the purposes of the legitimate interests of the data controller or a third party, except where such interests are overridden by the interests or fundamental rights or freedoms of the data subject	To streamline and improve the quality of our services. For internal purposes relating to equality; statistically monitoring the diversity of our client base.

b) Special categories of personal data (article 9 of GDPR)

Our lawful basis for processing your special categories of data:

<input checked="" type="checkbox"/> Explicit consent of the data subject	Our Booking /Referral Consent Form can be found at www.noahsarkfamilyproject.com/registration
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<input type="checkbox"/> Processing necessary for carrying out obligations under employment, social security or social protection law, or a collective agreement	N/A
<input checked="" type="checkbox"/> Processing necessary to protect the vital interests of a data subject or another individual where the data subject is physically or legally incapable of giving consent	Information used for the purpose of safeguard, where required.
<input type="checkbox"/> Processing carried out by a not-for-profit body with a political, philosophical, religious or trade union aim provided that the processing relates only to members or former members (or those who have regular contact with it in connection with those purposes); and there is no disclosure to a third party without consent	N/A
<input type="checkbox"/> Processing relates to personal data manifestly made public by the data subject	N/A
<input type="checkbox"/> Processing necessary for the establishment, exercise or defence of legal claims or where courts are acting in their judicial capacity	N/A
<input type="checkbox"/> Processing necessary for reasons of substantial public interest on the basis of EU or Member State law	N/A
<input type="checkbox"/> Processing necessary for reasons of preventative or occupational medicine, for assessing the working capacity of an employee, medical diagnosis, the provision of health or social care or treatment or management of health or social care systems and services on the basis of EU or Member State law or a contract with a health professional	N/A
<input type="checkbox"/> Processing necessary for the reasons of public interest in the area of public health	N/A

<input checked="" type="checkbox"/> Processing necessary for archiving purposes in the public interest, or scientific and historical research purposes or statistical purposes	For internal purposes relating to equality; statistically monitoring the diversity of our client base.
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6. Sharing your personal data

Your personal data will be treated as strictly confidential and, in most cases, will be shared only with staff of Noah’s Ark Family Project. The only exception to this is that your personal data may be shared with law enforcement, social services, and/or medical & healthcare services, if it is deemed by us that there is an immediate and significant risk to you or someone else, for which sharing your personal data may negate said risk.

7. How long do we keep your personal data?

We keep your personal data for no longer than reasonably necessary. We have determined this to be a period of 24 months from the date of your last receipt of service, in case of any legal claims/complaints; for safeguarding purposes, and to allow any renewed service requirements by the client within that time can include relevant record of previous service and progress.

8. Providing us with your personal data

We require your personal data as it is a requirement necessary to enter into a contract. The information we request is carefully considered as being important for providing an optimal service, necessary for safeguarding purposes, and ensuring equal opportunity.

9. Your rights and your personal data

Unless subject to an exemption under the GDPR, you have the following rights with respect to your personal data:

- The right to request a copy of the personal data which we hold about you;
- The right to request that we correct any personal data if it is found to be inaccurate or out of date;
- The right to request your personal data is erased where it is no longer necessary to retain such data;
- The right to request that we provide you with your personal data and where possible, to transmit that data directly to another data controller, (known as the right to data portability), (where applicable i.e. where the processing is based on consent or is necessary for the performance of a contract with the data subject and where the data controller processes the data by automated means);
- The right, where there is a dispute in relation to the accuracy or processing of your personal data, to request a restriction is placed on further processing;

- The right to object to the processing of personal data, (where applicable i.e. where processing is based on legitimate interests (or the performance of a task in the public interest/exercise of official authority); direct marketing and processing for the purposes of scientific/historical research and statistics).

10. Transfer of Data Abroad

As we are based within the UK, your personal data will be held within the EEA. Any transfer of your personal data outside of the EEA will be subject to safeguarding requirements, with the recipients being deemed the appropriate service providers for continued safeguarding measures, as highlighted in Article 6.

11. Automated Decision Making

We do not use any form of automated decision making in our business.

12. Further processing

If we wish to use your personal data for a new purpose, not covered by this Data Privacy Notice, then we will provide you with a new notice explaining this new use prior to commencing the processing and setting out the relevant purposes and processing conditions.

13. Changes to our privacy policy

Any changes we may make to our privacy policy in the future will be posted on this page and, where appropriate, notified to you by e-mail. Please check back frequently to see any updates or changes to our privacy policy.

14. How to make a complaint

To exercise all relevant rights, queries or complaints please in the first instance contact us directly on enquiries@noahsarkfamilyproject.com or using the 'Contact Us' page of our website, www.noahsarkfamilyproject.com/contact-us.

If this does not resolve your complaint to your satisfaction, you have the right to lodge a complaint with the Information Commissioners Office on 0(+44)3031231113 or via email <https://ico.org.uk/global/contact-us/email/> or at the Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF, England.