

Open Age Member Privacy Notice

This section applies to Members of Open Age ONLY.

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1. Purpose

Open Age is committed to protecting the privacy and security of your personal information.

This privacy notice describes how we collect and use personal information about you during and after your membership relationship with us, in accordance with data protection legislation, including the General Data Protection Regulation (GDPR) and Data Protection Act 2018, and may be amended from time to time.

Open Age is a “data controller”. This means that we are responsible for deciding how we hold and use personal information about you. We are required under data protection legislation to notify you of the information contained in this privacy notice.

As part of the services we offer, we are required to process personal data about our staff, our service users and, in some instances, the friends or relatives of our service users and staff. “Processing” can mean collecting, recording, organising, storing, sharing or destroying data.

2. What information does Open Age collect?

Open Age collects and processes a range of information about you. This includes:

- your name, address and contact details, including email address and telephone number, date of birth and gender;
- the terms and conditions of your membership;
- information about your employment status and entitlement to benefits;
- information about your emergency contacts;
- Health and social care data about you, which might include both your physical and mental health data.

- We may also record data about your race, ethnic origin, sexual orientation or religion.
- your bank or credit card details. If you make a donation online, your card information is not held by us, it is collected by our third party payment processors, who specialise in the secure online capture and processing of credit/debit card transactions;
- information as to whether you are a UK taxpayer so we can claim gift aid;

3. Why does Open Age process personal data?

We need this data so that we can provide high-quality services and support.

- providing you with the services or information you asked for.
- keeping a record of your relationship with us;
- conducting analysis and market research to better understand how we can improve our services or information;
- checking for updated contact details;
- dealing with entries into a competition;
- seeking your views or comments on the services we provide;
- notifying you of changes to our services;
- sending you communications which you have requested and that may be of interest to you. These may include information about campaigns, fundraising appeals and activities;
- checking donations for the purposes of prevention of fraud or other crime;
- processing grant applications.

We may also process your data with your consent. If we need to ask for your permission, we will offer you a clear choice and ask that you confirm to us that you consent. We will also explain clearly to you what we need the data for and how you can withdraw your consent at any time.

4. Who has access to data?

Your information may be shared internally, including with our finance team, staff members, tutors and volunteers, access to the data is necessary for the purpose of providing activities.

We do not sell or rent your information to third parties for marketing purposes.

Open Age will not transfer your data to countries outside the European Economic Area.

We may pass your information to our third party service providers, suppliers, agents, subcontractors and other associated organisations for the purposes of completing tasks and providing services to you on our behalf (for example to process donations and send you mailings).

However, when we use these third parties, we disclose only the personal information that is necessary to deliver the services and we have a contract in place that requires them to keep your information secure and prevents them from using it for their own direct marketing purposes.

Please be reassured that we will not release your information to third parties for them to use for their own direct marketing purposes, unless you have requested us to do so, or we are required to do so by law, for example, by a court order or for the purposes of prevention of fraud or other crime.

5. Lawful Processing

Data protection law requires us to rely on one or more lawful grounds to process your personal information. We consider the following grounds to be relevant:

- Where you have provided specific consent to us using your personal information in a certain way, such as to send you email, text and/or telephone marketing.
- Where necessary so that we can comply with a legal or regulatory obligation to which we are subject, for example where we are ordered by a court or regulatory authority like the Charity Commission or Fundraising Regulator.
- Where it is necessary to protect life or health (for example in the case of medical emergency suffered by an individual at one of our events) or a safeguarding issue which requires us to share your information with the emergency services.
- Where it is reasonably necessary to achieve our or others' legitimate interests (as long as what the information is used for is fair and does not duly impact your rights).

We consider our legitimate interests to be running Open Age as a charitable organisation in pursuit of our aims and ideals. For example to:

- send postal communications which we think will be of interest to you;
- conduct research to better understand our supporters and to improve the relevance of our fundraising;
- understand how people choose/use our services and products;
- determine the effectiveness of our services, promotional campaigns and advertising;
- provide you with information about the vital work we do for older people, our fundraising appeals and opportunities to support us by post.
- monitor who we deal with to protect the charity against fraud, money laundering and other risks;
- enhance, modify, personalise or otherwise improve our services /communications for the benefit of our members;
- better understand how people interact with our website.

When we legitimately process your personal information in this way, we consider and balance any potential impact on you (both positive and negative), and your rights under data protection laws.

We will not use your personal information where our interests are overridden by the impact on you, for example, where use would be excessively intrusive (unless, for instance, we are otherwise required or permitted to by law).

6. How does Open Age protect data?

Open Age takes the security of your data seriously. We have 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 authorised employees in the performance of their duties.

Where we engage third parties to process personal data on our 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.

7. For how long does Open Age keep data?

We keep your information for no longer than is necessary for the purposes it was collected for. The length of time we retain your personal information for is determined by operational and legal considerations. For example, we are legally required to hold some types of information to fulfil our statutory and regulatory obligations (e.g. health/safety and tax/accounting purposes).

We review our retention periods on a regular basis.

If you would like to know more about how long we hold your personal data for – please email us on mail@openage.org.uk to receive a copy of our data protection policy.

8. 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 Open Age to change incorrect or incomplete data;
- require Open Age 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 Open Age is relying on its legitimate interests as the legal ground for processing.

If you would like to exercise any of these rights, please contact the Operations Manager ccampbell@openage.org.uk. If you believe that Open Age has not complied with your data protection rights, you can complain to the Information Commissioner.

9. Marketing

You have a choice about whether or not you wish to receive information from us. If you do not want to receive direct marketing communications from us **BY POST** about the vital work we do for older people then you can let us know by using the contact information below. **PLEASE NOTE THIS DOES NOT INCLUDE OUR ACTIVITIY PROGRAMMES**

If you do not want to receive direct marketing communications from us **BY EMAIL or PHONE** about the vital work we do for older people then you can let us know by using the 'opt out' option on the form that you complete when signing up. **PLEASE NOTE THIS DOES NOT INCLUDE OUR ACTIVITIY PROGRAMMES**

We're committed to putting you in control of your data so you're free to change your marketing preferences (including to tell us that you don't want to be contacted for marketing purposes) at any time using: mail@openage.org.uk, or by telephone: 020 4516 9978, or post: Operations Manager, Open Age, St Charles Centre for Health and Wellbeing, Exmoor Street, London, W10 6DZ.

We will not use your personal information for marketing purposes if you have indicated that you do not wish to be contacted and will retain your details on a suppression list to help ensure that we do not continue to contact you. However, we may still need to contact you for administrative purposes like where we are processing a donation or thanking you for your participation in an event.

We will endeavour to respond fully to all requests within one month of receipt of your request, however if we are unable to do so we will contact you with reasons for the delay.

Please note that exceptions apply to a number of these rights, and not all rights will be applicable in all circumstances. For more details we recommend you consult the guidance published by the UK's [Information Commissioner's Office](#).