



This comprehensive privacy notice combines information relevant to clients, website users, donors and candidates for volunteer roles of The Cellar Trust (TCT). Sections are marked to indicate the intended audience.

1. **General Information**

1.1. **Who we are**

TCT is a charity working in Bradford District and Craven to support people struggling with their mental health move forward in their recovery and live independent, fulfilling lives.

References to “we”, “us” or “our” in this Privacy Notice are references to TCT, a company limited by guarantee registered in England and Wales, registered company number: 2304802; and a charity registered in England and Wales, registered charity number: 701982.

Your privacy is very important to us and we are committed to letting you know how we use your personal information and how we use your data responsibly. We will never give out or sell the information we have to a third party unless we have your consent or are required to by law in special circumstances.

We are a “data controller” for the purposes of the UK General Data Protection Regulation (GDPR) 2016. This means that we are responsible for, and control the processing of, your personal information.

2. **Privacy Notice Overview**

2.1. **What is a Privacy Notice?**

A Privacy Notice is a statement by TCT which tells you how we use the personal information we hold about you. We are committed to being transparent about how we collect and use your data to meet our obligations under the Data Protection Act 2018 and the UK General Data Protection Regulation (GDPR).

2.2. **What information do we collect and why?**

Data protection laws require us to inform you about the purposes for which we use your personal data. We are also required to have, and to inform you of, the legal basis we rely upon for such use. ‘Legal bases’ are the legal reasons for our use of your personal data – these are set out in data protection laws. We cannot use your personal data if we do not have a valid legal basis for such use.

The Cellar Trust

Privacy Notice



Category of Personal data	Purpose of Processing	Legal Basis for Processing
Clients of TCT		
First name, last name, initials, title, contact details (work or personal) and information related to reason for using our services	To register you with TTCT and provide our services to you.	It is in our legitimate interests to collect this information to provide our services to you.
All other users		
First name, last name, initials, title, contact details (work or personal) and work history and skills.	If you have visited the website or our premises and provided your information to The Cellar Trust to volunteer, to apply for a job, to donate to TCT, or sign up to receive communications from TCT.	To perform the contract, we have with you or because it is in our legitimate interests to ensure we know who is visiting our premises or who we are recruiting, and to uphold our policies and ensure a fair and safe working environment. We rely on consent where you have signed up to receive communications from TCT.
Ethnicity, religion, sexual orientation, gender at birth, gender identity, disability, age, health condition.	Diversity monitoring.	Consent.



Medical/health information, including your GP practice and National Health Service number.	To provide you with the relevant services from TCT based on the information you have submitted.	It is our legitimate interests to process this information to provide our services. We may also collect your consent. There may be a regulatory requirement for us to collect this information, and it may be in your vital interests that we process this information.
Financial/banking information	To provide you with paid for services from TCT or to enable donations to TCT	It is in our legitimate interests to collect this information in order to deliver our services to you or delivery performance of a contract.
Images and video recordings.	For visitors of TCT premises, we operate close-circuit television (CCTV) outside the building and in the main reception.	It is in our legitimate interests to process this data for safety and security reasons.
Technical information and log and usage information.	To improve the user's experience when using this website.	Where you have consented/opted in to the use of cookies when accessing the website.

3. Special Category Data

Some types of personal information in the table above are more sensitive and have been identified as 'Special Category Data' under the law. We are legally



required to handle it with more protection. The purposes for processing and the lawful basis on which we hold this data are set out in the table above.

4. **Data Retention**

We will only retain your personal information for as long as necessary to fulfil the purposes we collected it for, including the purposes of satisfying any legal, accounting or reporting requirements.

5. **Access to Your Data**

Your information may be shared internally, including with staff members responsible for managing, delivering and administering services. It may also be shared with external services and professionals such as the Community Mental Health Team, your job centre worker, your GP or your care coordinator. This will only be done with your explicit consent or where we believe you are at risk of harm and it is in your best interest to do so. We may have to share your data with other third parties, including third-party service providers, for example in connection with supporting our client management system and IT network (including remote support) and professional advisers where necessary, who may be party to confidential discussions related to an individual. We will share your information with third parties where required by law, where it is necessary to administer our relationship with you or where we have another legitimate interest. All our third-party service providers are required to take appropriate security measures to protect your personal information in line with our policies. We only permit them to process your personal data for specified purposes and in accordance with our instructions.

We do not currently use the services of any supplier outside the United Kingdom (UK) and European Economic Area (EEA) so no personal information is transferred, processed and stored outside the UK or EEA. You should be aware that, in general, legal protection for personal information in countries outside the UK/EEA may not be equivalent to the level of protection provided in the UK/EEA. If we do decide to use a supplier outside the UK/EEA we will take steps to put in place suitable safeguards to protect your personal information.

We will only pass on your information without your consent when there is a situation that indicates you may be a danger to yourself or someone else, or information about a child at risk of harm or neglect.



6. Automated Decision Making

We do not expect that any decisions will be taken about you using automated means, however we will notify you if this position changes.

7. Your Legal Rights

You have various rights relating to the data we hold about you (however some of these depend on the legal basis on which we hold your data):

- You can request copies of all the personal information that we hold about you.
- You can withdraw your consent for us to use your personal information (where we rely on your consent to process it – see the table above).
- You can ask us to change inaccurate data.
- You can ask us to delete your personal information where it is no longer necessary for us to use it, you have withdrawn consent, or where we have no legal basis for keeping it.
- You can ask for us to transfer your data to another party or restrict its use.

We ask for your personal information as part of the referral/assessment process to enable access to our services. If you have provided your consent to the collection, processing and transfer of your personal information for a specific purpose, you have the right to withdraw your consent at any time. Once confirmed, we will no longer process your information for the purpose you originally agreed to, unless we have another legitimate basis for doing so in law.

8. Accessing Your Data

You will not have to pay a fee to access your personal information. However, if we think that your request is unfounded or excessive, we may charge a reasonable fee or refuse to comply with the request. We may need to confirm your identity or ensure your right to exercise your legal rights. This is another appropriate security measure to ensure that personal information is not disclosed to any person who has no right to receive it.

If you wish to access the personal data we hold about you, please complete the Subject Access Request (SAR) form [here](#).



9. **Changes to this Privacy Notice**

We reserve the right to update this Privacy Notice at any time. The latest copy of our Privacy Notice will be on our website. We may also notify you in other ways from time to time about the processing of your personal information.

10. **How we obtain your data**

10.1. **When you interact with us directly**

This could be if you ask us about our activities, register with us for our newsletter, make a donation to us, apply for a job or volunteering opportunity or otherwise provide us with your personal information. This could be contact in person, over the phone or by email.

10.2. **When you visit our premises**

Visitors to TCT are required to sign in and out at reception, this helps us know who is in the building. We also operate closed-circuit television (CCTV) outside the building and in the main reception area. We use a third-party security company to monitor CCTV. CCTV recordings are retained for 30 days unless we are required to retain a recording for longer. The purpose for processing this information is for security and safety reasons.

10.3. **When you visit our website**

We gather general information which might include which pages you visit most often and which services, events or information is of most interest to you. We may also track which pages you visit when you click on links in emails from us. We also use "cookies" to help our site run effectively. There are more details below – see the section on 'Cookies'. We use this information to personalise the way our website is presented when you visit to make improvements and to ensure we provide the best service and experience for you. Wherever possible we use anonymous information which does not identify individual visitors to our website.

11. **Cookies**

We use cookies on our website. A cookie is a small file which asks permission to be placed on your computer's hard drive, and it helps us to recognise and track users to provide them with a better online experience. Once you agree, the file is added, and the cookie helps analyse web traffic or lets us know when



you visit a particular site. Cookies mean that websites respond to you as an individual and can adapt to your needs, likes and dislikes by gathering and remembering information about your preferences.

We only use this information for statistical analysis purposes and then the data is removed from the system. Cookies help us provide you with a better website because we can monitor which pages you find useful and which you do not. A cookie will never give us access to your computer or any information about you; other than the data you choose to share with us.

You can choose to accept or decline cookies. Most web browsers automatically accept cookies, but you can usually modify your browser setting to decline cookies if you want to.

11.1. **When you interact with us directly**

This could be if you ask us about our activities. This could be contact in person, over the phone or by email.

11.2. **Where you have been referred to us**

Your GP or another third party may have provided us with your details through our referral process. Where this is the case, the referrer should discuss with you prior to submitting your personal information with TCT.

12. **Contact Details**

For further information about our privacy practices, please contact Helen Horsman our Data Protection Officer by:

- Writing to The Cellar Trust, Farfield, Farfield Road, Shipley BD18 4QP
- Calling on 01274 586474
- Emailing informationgovernance@thecellartrust.org

If you have concerns about how we are holding and processing your data you can also make a complaint to the Information Commissioner's Office by visiting: <https://ico.org.uk>