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Elizabeth Vande Putte t/a Actually Autistic Adult <u>customer privacy notice</u>

This privacy notice tells you what to expect us to do with your personal information.

- ! Contact details
- ! What information we collect, use, and why
- ! <u>Lawful bases and data protection rights</u>
- ! Where we get personal information from
- ! How long we keep information
- ! Who we share information with
- ! How to complain

Contact details

Email

lvputte@gmail.com

What information we collect, use, and why

We collect or use the following information to **provide and improve products** and services for clients:

!	Names and contact details
!	Addresses
!	Gender
!	Pronoun preferences
!	Occupation
!	Date of birth
!	Marital status
!	Third party information (such as family members or other relevant parties)
!	Payment details (including card or bank information for transfers and direct debits)
!	Transaction data (including details about payments to and from you and details of products and services you have purchased)
!	Usage data (including information about how you interact with and use our website, products and services)
!	Employment details (including salary, sick pay and length of service)
!	Health information (such as medical records or health conditions)
!	Information relating to compliments or complaints
!	Video recordings
!	Audio recordings (eg calls)
!	Records of meetings and decisions
!	Website user information
We also collect or use the following information to provide and improve	

products and services for clients:

!

Racial or ethnic origin

! Trade union membership Health information We collect or use the following personal information for the operation of client or customer accounts: ! Names and contact details Addresses ! 1 Purchase or service history Account information, including registration details ! ! Information used for security purposes ! Marketing preferences Technical data, including information about browser and operating systems We collect or use the following personal information for information updates or marketing purposes: Names and contact details ! Addresses ! Profile information Marketing preferences Purchase or account history ! ! Website and app user journey information IP addresses We collect or use the following personal information to comply with legal requirements:

!

!

Name

Contact information

! Identification documents Client account information ! Any other personal information required to comply with legal obligations We also collect or use the following information to comply with legal requirements: ! Racial or ethnic origin ! Trade union membership Sexual orientation information ! We collect or use the following personal information to **protect client welfare**: ! Names and contact information Client account information ! Health and wellbeing information ! ! **Emergency contact details** We also collect or use the following information to **protect client welfare**: ! Racial or ethnic origin ! Political opinions Religious or philosophical beliefs ! Health information Sexual orientation information We collect or use the following personal information for dealing with queries, complaints or claims:

!

Names and contact details

Address

- ! Payment details
- ! Account information
- ! Purchase or service history
- ! Video recordings of public areas
- ! Video recordings of private or staff only areas
- ! Call recordings
- ! Witness statements and contact details
- ! Photographs
- ! Relevant information from previous investigations
- ! Customer or client accounts and records
- ! Financial transaction information
- ! Information relating to health and safety (including incident investigation details and reports and accident book records)
- ! Correspondence

Lawful bases and data protection rights

Under UK data protection law, we must have a "lawful basis" for collecting and using your personal information. There is a list of possible lawful bases in the UK GDPR. You can find out more about lawful bases on the ICO's website.

Which lawful basis we rely on may affect your data protection rights which are in brief set out below. You can find out more about your data protection rights and the exemptions which may apply on the ICO's website:

Your right of access - You have the right to ask us for copies of your personal information. You can request other information such as details about where we get personal information from and who we share personal information with. There are some exemptions which means you may not receive all the information you ask for. <u>You can read more about this right here</u>.

Your right to rectification - You have the right to ask us to correct or delete personal information you think is inaccurate or incomplete. You can read more about this right here.

Your right to erasure - You have the right to ask us to delete your personal information. <u>You can read more about this right here</u>.

Your right to restriction of processing - You have the right to ask us to limit how we can use your personal information. <u>You can read more about this right here.</u>

Your right to object to processing - You have the right to object to the processing of your personal data. <u>You can read more about this right</u> here.

Your right to data portability - You have the right to ask that we transfer the personal information you gave us to another organisation, or to you. <u>You can read more about this right here</u>.

Your right to withdraw consent – When we use consent as our lawful basis you have the right to withdraw your consent at any time. <u>You can read more about this right here</u>.

If you make a request, we must respond to you without undue delay and in any event within one month.

To make a data protection rights request, please contact us using the contact details at the top of this privacy notice.

Our lawful bases for the collection and use of your data

Our lawful bases for collecting or using personal information to **provide and improve products and services for clients** are:

- Consent we have permission from you after we gave you all the relevant information. All of your data protection rights may apply, except the right to object. To be clear, you do have the right to withdraw your consent at any time.
- Contract we have to collect or use the information so we can enter into or carry out a contract with you. All of your data protection rights may apply except the right to object.
- ! Legitimate interests we're collecting or using your information because it benefits you, our organisation or someone else, without causing an

undue risk of harm to anyone. All of your data protection rights may apply, except the right to portability. Our legitimate interests are:

My legitimate interest relates to the provision of training and coaching services, for which I need personal health and wellbeing information. I may be party to the details of workplace disputes and other legal processes where, although I am not directly involved, my input may be required and I will need all the facts.

Our lawful bases for collecting or using personal information for the **operation of** client or customer accounts are:

Contract – we have to collect or use the information so we can enter into or carry out a contract with you. All of your data protection rights may apply except the right to object.

Our lawful bases for collecting or using personal information for **information updates or marketing purposes** are:

! Consent - we have permission from you after we gave you all the relevant information. All of your data protection rights may apply, except the right to object. To be clear, you do have the right to withdraw your consent at any time.

Our lawful bases for collecting or using personal information to **comply with legal requirements**:

- Consent we have permission from you after we gave you all the relevant information. All of your data protection rights may apply, except the right to object. To be clear, you do have the right to withdraw your consent at any time.
- ! Legitimate interests we're collecting or using your information because it benefits you, our organisation or someone else, without causing an undue risk of harm to anyone. All of your data protection rights may apply, except the right to portability. Our legitimate interests are:
 - My legitimate interest relates to the provision of training and coaching services, for which I need personal health and wellbeing information. I may be party to the details of workplace disputes and other legal

processes where, although I am not directly involved, my input may be required and I will need all the facts.

Our lawful bases for collecting or using personal information to **protect client** welfare are:

- ! Legitimate interests we're collecting or using your information because it benefits you, our organisation or someone else, without causing an undue risk of harm to anyone. All of your data protection rights may apply, except the right to portability. Our legitimate interests are:
 - My legitimate interest relates to the provision of training and coaching services, for which I need personal health and wellbeing information. I may be party to the details of workplace disputes and other legal processes where, although I am not directly involved, my input may be required and I will need all the facts.

Our lawful bases for collecting or using personal information for **dealing with queries, complaints or claims** are:

- Consent we have permission from you after we gave you all the relevant information. All of your data protection rights may apply, except the right to object. To be clear, you do have the right to withdraw your consent at any time.
- Legitimate interests we're collecting or using your information because it benefits you, our organisation or someone else, without causing an undue risk of harm to anyone. All of your data protection rights may apply, except the right to portability. Our legitimate interests are:
 - My legitimate interest relates to the provision of training and coaching services, for which I need personal health and wellbeing information. I may be party to the details of workplace disputes and other legal processes where, although I am not directly involved, my input may be required and I will need all the facts.

Where we get personal information from

- ! Directly from you
- ! Publicly available sources

- ! Previous employment
- ! Providers of marketing lists and other personal information
- ! Suppliers and service providers

How long we keep information

Please contact me for the retention schedule.

Who we share information with

Others we share personal information with

- ! Organisations we're legally obliged to share personal information with
- ! Professional consultants
- ! Third parties:
 - Government schemes such as Access To Work
 - Employers of my clients (with the verbal or written consent of said client)

How to complain

If you have any concerns about our use of your personal data, you can make a complaint to us using the contact details at the top of this privacy notice.

If you remain unhappy with how we've used your data after raising a complaint with us, you can also complain to the ICO.

The ICO's address:

Information Commissioner's Office

Wycliffe House

Water Lane

Wilmslow

Cheshire

SK9 5AF

Helpline number: 0303 123 1113

Website: https://www.ico.org.uk/make-a-complaint

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