

Privacy Notice

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Pass Amendments to	
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Implementation and Quality Assurance

Implementation is immediate and this notice shall stay in force until any alterations are formally agreed.

The notice will be reviewed every two years by the Board of Trustees, sooner if legislation, best practice or other circumstances indicate this is necessary.

All aspects of this Policy shall be open to review at any time. If you have any comments or suggestions on the content of this policy, please contact:

- Adrian Kirk; adrian@careaftercombat.org or
- Amy Barnett; amy.barnett@careaftercombat.org

Care After Combat, Office 12, Newark Beacon Centre, Cafferata Way, Newark NG24 2TN.
01636 557 543

		It is important that you read this notice, together with any other privacy notice that is provided on specific occasions when we are collecting or processing personal information about you, so that you are aware of how and why we are using such information.
1.		Who are we
		<p>Care after Combat gather and process your personal information in accordance with this privacy notice and in compliance with the relevant data protection Regulation and laws. This notice provides you with the necessary information regarding your rights and our obligations, and explains how, why, and when we process your personal data.</p> <p>Care after Combat's registered office is Office 12, Newark Beacon Centre, Cafferata Way, Newark, NG24.</p> <p>We are a 'Registered Charity' England and Wales (1159342)</p> <p>We are a company registered in England and Wales under company number (09152620).</p> <p>We are registered on the Information Commissioner's Office Register; registration number (ZA897233), and act as the data controller and data processor when processing your data. We have a dedicated Data Protection Controller who can be contacted at Care after Combat, Office 12, Newark Beacon Centre, Cafferata Way, Newark, NG24 2TN. Email enquiries@careaftercombat.org</p>
2.		Data Protection Principles
		<p>We will comply with the data protection principles under the data protection legislation. This says that the personal information we hold about you must be:</p> <ul style="list-style-type: none"> • used lawfully, fairly and in a transparent way • collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes • relevant to the purposes we have told you about and limited only to those purposes • accurate and kept up to date • kept only as long as necessary for the purposes we have told you about • kept securely
3		Information That We Collect
		<p>Care after Combat processes your personal information to meet our legal, statutory and contractual obligations and to provide you with our services. We will never collect any unnecessary personal data from you and do not process your information in any way, other than as specified in this notice. The personal data that we collect from is:</p>

		<ul style="list-style-type: none"> • Full Name • Title and Rank • Service • Date of Birth • Service Number • Enlistment Date • Discharge Date • Campaigns Served • Employment History • Home Address • Personal Email • Business Email • Financial Problems • Evidence of your right to work in the UK/immigration status • Family, lifestyle and social circumstances • Copies of driving licence, passport, birth and marriage certificates, decree absolute • Home Telephone Number • Mobile Telephone Number • Special Category Data – i.e. health/medical information, information about criminal convictions/allegations and offences etc. (not in all cases; only where applicable to the service programme offered). <p>We collect information in the below ways:</p> <ul style="list-style-type: none"> • Paper and Website Registrations • Telephone Disclosures • Employment CVs • Employee Data • Review meetings • Group Events • Email • Referral Information • Web chat and Webinars
4		How We Use Your Personal Data (Our Legal Basis For Processing)
		<p>Care after Combat takes your privacy very seriously and will never disclose or share your data outside our Partners listed in this notice without your consent, unless required to do so by law. We only retain your data for as long as is necessary and for the purposes specified in this notice. Where you have consented to us providing you with marketing, you are free to withdraw this consent at any time.</p> <p>The purposes and reasons for processing your personal data are detailed below:</p> <ul style="list-style-type: none"> • We collect and process your personal data in the performance of a contract or to provide a service to you as a client/beneficiary with your consent. • We collect and process your personal data in the performance of a government contract to provide a service to you as a client/beneficiary under legitimate interest.

		<ul style="list-style-type: none"> • We collect and store your personal data as part of our legal obligation for business accounting and tax purposes. • We will occasionally send you marketing information where we have assessed that it is beneficial to you as a client/beneficiary and in our interests. Such information will be non-intrusive and is processed on the grounds of legitimate interests.
5		Your Rights
		<p>The law requires us to tell you about your rights and our obligations to you regarding the processing and control of your personal data. We do this now by requesting you read the information provided at www.knowyourprivacyrights.org.</p> <p>You have the right to access any personal information that Care after Combat processes about you and to request information about:</p> <ul style="list-style-type: none"> • What personal data we hold about you • The purposes of the processing • The categories of personal data concerned • The recipients to whom the personal data has/will be disclosed • How long we intend to store your personal data for • If we did not collect the data directly from you, information about the source/provider <p>If you believe that we hold any incomplete or inaccurate data about you, you have the right to ask us to correct and/or complete the information and we will strive to do so as quickly as possible; unless there is a valid reason for not doing so, at which point you will be notified.</p> <p>You also have the right to request erasure of your personal data or to restrict processing (where applicable) in accordance with the data protection laws; as well as to object to any direct marketing from us. Where applicable, you have the right to data portability of your information and the right to be informed about any automated decision-making we may use (currently Care after Combat does not use any automated decision-making processes).</p> <p>If we receive a request from you to exercise any of the above rights, we will ask you to verify your identity before acting on the request; this is to ensure that your data is protected and kept secure.</p>
6		Sharing And Disclosing Your Personal Information
		<p>We do not share or disclose any of your personal information without your consent, other than for the purposes specified in this notice or where there is a legal requirement. Care after Combat uses third parties (partners) to provide and enhance our services and business functions; however, all processors acting on our behalf only process your data in accordance with instructions from us and comply fully with this privacy notice, the data</p>

	<p>protection laws and any other appropriate confidentiality and security measures.</p> <p>We only share your data with recognised partners that are appropriate to your specific support programme. Our partners may include those listed below, but there is a wider support network that we may work with to support individual cases. We will keep you informed of partners linked within your specific programme:</p> <p>Contract Partners</p> <ul style="list-style-type: none"> • The NHS. As a sub-contractor, delivering an in prison provision, we process data for those beneficiaries we work with. • Forces Employment Charity. Details of their Privacy Policy are at https://www.forcesemployment.org.uk/privacy-policy/#:~:text=We%20do%20not%20share%20or,there%20is%20a%20legal%20requirement. <p>Charitable and Social Enterprise Partners</p> <ul style="list-style-type: none"> • Greenwich Hospital. Details are at http://www.grenhosp.org.uk/ • The Royal Navy and Royal Marines Charity (RNRMC). Details of their Privacy Policy are at https://www.rnrmc.org.uk/Handlers/Download.ashx?IDMF=2945558f-f9df-487c-860a-94c65107818b • The Royal British Legion. Details of their Data Protection, Privacy and Communications Policy are at https://www.britishlegion.org.uk/quick-links/our-privacy-policy-and-promise • ABF The Soldiers' Charity. Details of their Privacy Policy are at https://www.soldierscharity.org/privacy/ • RAF Benevolent Fund. Details of their Privacy Policy are at https://www.rafbf.org/privacy • Department for Work. Details of their Privacy Policy are at https://www.gov.uk/government/organisations/department-for-work-pensions/about/personal-information-charter • Lloyds Patriotic Fund. Details can be found here https://www.lloyds.com/help/privacy The Veterans' Foundation. Details of their Privacy Policy are at https://www.veteransfoundation.org.uk/docs/VETERANS_FOUNDATION_LEGAL_NOTICE_AND_DATA_PROTECTION.pdf • SSAFA. Details can be found here https://www.ssafa.org.uk/policy-hub/privacy-policy <p>Employers and Training Provided</p> <ul style="list-style-type: none"> • Training providers – To support your job searching activities, we will only share information you have consented to share.
7	Safeguarding Measures
	Care after Combat takes your privacy seriously and takes every reasonable measure and precaution to protect and secure your personal data. We work

		<p>hard to protect you and your information from unauthorised access, alteration, disclosure, or destruction and have several layers of security measures in place, including:</p> <ul style="list-style-type: none"> • Restricted Access • IT Authentication • Data Encryption • Firewalls • Controlled Anti-virus/malware • Pseudonymisation
8		How We Store Personal Data
		<p>Your personal data will be stored in a secure Information Technology system. We have put in place appropriate security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed.</p> <ul style="list-style-type: none"> • In addition, we limit access to your personal information to only Care after Combat personnel, agents, contractors and other third parties who have a business need to know. They will only process your personal information on our instructions. Details of these measures are available upon request from our Data Protection Controller. • Third parties will only process your personal information on our instructions and where they have agreed to treat the information confidentially and to keep it secure, in a contractual arrangement. • We have put in place procedures to deal with any suspected data security breach and will notify you and the Information Commissioner's Office (ICO) of a suspected breach where we are legally required to do so. <p>Contracted Supplier Care after Combat contract a small number of suppliers to assist in ensuring your personal data is stored securely. All contractors meet GDPR, Data Protection Act 2018 and ISO 27001 requirements.</p> <ul style="list-style-type: none"> • Salesforce
9		Consequences Of Not Providing Your Data
		<p>You are not obligated to provide your personal information to Care after Combat, however, as this information is required for us to provide you with our services and legitimate interests, we will not be able to offer some/all our services without it.</p>
10		Legitimate Interests
		<p>As noted in the 'How We Use Your Personal Data' section of this notice, we occasionally process your personal information under the legitimate interests' legal basis. Where this is the case, we have carried out a thorough Legitimate Interests' Assessment (LIA) to ensure that we have weighed your interests and any risk posed to you against our own interests; ensuring that they are proportionate and appropriate.</p>
11		How Long We Keep Your Data
		<p>Care after Combat only ever retains personal information for as long as is necessary and we have strict review and retention policies in place to meet</p>

		<p>these obligations. We are required under UK tax law to keep your basic personal data (name, address, contact details) for a minimum of 6 years plus current year.</p> <p>Where you have consented to us using your details for direct marketing, we will keep such data until you notify us otherwise and/or withdraw your consent.</p>
12		Change Of Purpose
		<p>We will only use your personal information for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If we need to use your personal information for an unrelated or new purpose, we will notify you and we will explain the legal basis which allows us to do so.</p>
13		Special Categories Data
		<p>Owing to the provision requirements of some of our more specialised services, Care after Combat sometimes needs to process sensitive personal information (known as special category data) about you; for example, information about your health. Where we collect such information, we will only request and process the minimum necessary for the specified purpose and identify a compliant legal basis for doing so.</p>
14		Do We Need Your Consent?
		<p>We do not need your consent if we use special categories of your personal information in accordance with our reasons outlined above.</p> <p>In limited circumstances, if the need arises, we will approach you for your written consent to allow us to process certain particularly sensitive data. If we do so, we will provide you with full details of the information that we would like and the reason we need it, so that you can carefully consider whether you wish to consent. You should be aware that it is not a condition of your contract with us that you agree to any request for consent from us.</p>
15		Information About Criminal Convictions
		<p>We will only use information relating to criminal convictions or alleged criminal behaviour where the law requires us to do so. This can arise when it is necessary for us to comply with the law or for another reason where there is a substantial public interest in us doing so.</p> <p>Less commonly, we will, if necessary, use information relating to criminal convictions or alleged criminal behaviour where it is necessary in relation to legal claims, where it is necessary to protect your interests, or someone else's interests and you are not capable of giving your consent, or where you have already made the information public.</p> <p>We will only collect information about criminal convictions or allegations of criminal behaviour where it is appropriate given the nature of the role and where we are legally able to do so. Where appropriate, we will collect information about criminal convictions/allegations as part of the specific</p>

		programme or if we are notified of such information directly by you while you are on one of our programmes.
16		Recruitment
		<p>We will collect your personal details, including but not limited to your name and contact details (together with your e-mail address) and other relevant information from your Curriculum Vitae ("CV"). On occasion this will also include sensitive personal information such as details of criminal convictions and ethnic origin. When we receive your details and CV electronically, this may be through a direct application on our website or an application that you have made through a third-party job board.</p> <p>We will likely obtain further personal information about you during our relationship with you. This information will have obtained from you directly.</p> <p>Our standard terms of business state that we retain applicant data such as CVs, interview notes and special category data (information on criminal convictions, biometric data etc) for the purposes of the specific role you apply for and that, as controllers of your data, you will be inform you if we plan to retain your CV on file to notify you about potential future roles.</p> <p>The length of time we will hold or store your personal information is for 6months once the position has been successfully filled.</p>
17		Duty To Inform
		It is important that the personal information we hold about you is accurate and current. Please keep us informed if your personal information changes during your time with us.
18		Lodging A Complaint
		<p>Care after Combat only processes your personal information in compliance with this privacy notice and in accordance with the relevant data protection laws. If, however you wish to raise a complaint regarding the processing of your personal data or are unsatisfied with how we have handled your information, you have the right to lodge a complaint with the supervisory authority.</p> <p>Care after Combat Data Protection Coordinator Office 12 Newark Beacon Centre Cafferata Way Newark NG24 2TN</p> <p>Information Commissioner's Office Wycliffe House Water Lane Wilmslow Cheshire</p>

		SK9 5AF Tel: 0303 123 1113 (local rate) or 01625 545 745 (National Rate) Fax: 01625 524 510
19		Cookie Notice
		<p>A 'cookie' is a small piece of data sent from a website and stored on the user's computer by the user's web browser while the user is browsing. When you visit a site that uses cookies for the first time, a cookie is downloaded onto your computer/mobile device so that the next time you visit that site, your device will remember useful information such as visited pages or logging in options.</p> <p>Cookies are widely used to make websites work, or to work more efficiently, and our site relies on cookies to optimise user experience and for features and services to function properly.</p> <p>Most web browsers allow some control to restrict or block cookies through the browser settings, however if you disable cookies, you may find this affects your ability to use certain parts of our website or services. For more information about cookies visit https://www.aboutcookies.org.</p>
20		Review Of This Privacy Notice
		<p>We may update this privacy notice from time to time as necessary. The terms that apply to you are those posted here on our website on the day you use our website. We advise you to print a copy for your records.</p> <p>If you have any question regarding our privacy policy, please contact us by email: enquiries@careaftercombat.org</p>