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1. Introduction

- 1.1 At Citizens Advice South West Surrey (CASWS) we collect and use your personal information to help solve your problems, improve our services and tackle wider issues in society that affect people’s lives.
- 1.2 This privacy policy explains how we use your information and what your rights are. We handle and store your personal information in line with data protection law and our confidentiality policy. The following pages tell you more about how we use your information in more detail.
- 1.3 Citizens Advice is a membership organisation made up of the national Citizens Advice charity and many local offices across England and Wales, including CASWS. CASWS is an independent charity and a member of the national Citizens Advice charity. All members of the Citizens Advice network are responsible for keeping your personal information safe and making sure data protection law is followed. Members of the network also run some jointly designed services and use some of the

same systems to process your personal data. In these instances we are joint data controllers for these activities.

- 1.4 All offices in the Citizens Advice network use some joint systems to carry out our activities. These include joint case management systems, telephony platforms and more. Staff from a different local Citizens Advice can only access your personal information in a joint system if they have a good reason. For example when:
- you go to a different office to seek advice
 - more than one office is working together in partnership
 - they need to investigate a complaint or incident
- 1.5 We have rules and controls in place to stop people accessing or using your information when they shouldn't. Tell an adviser if you're worried about your details being on a national system. We'll work with you to take extra steps to protect your information - for example by recording your problem without using your name.
- 1.6 National Citizens Advice has a privacy notice available on their website that covers general advice and nationally managed systems, including our case management systems. This policy covers the processing we carry out in our office.

2. How we use your data for advice

- 2.1 This section covers how we use your data to provide you with advice. For general advice and nationally funded programmes please see the national Citizens Advice [privacy notice](#).

How we collect your information

- 2.2 We collect personal data through our website, emails, third-party texting software, from third party referring organisation who may be providing your information to enable us to support you.

What information we collect

- 2.3 We collect the following information about you:
- Your name, address, date of birth, gender and contact details and preferences.
 - Information about the situation you are looking for help with.
 - Information about your household type, status, employment, nationality and first language.
 - Information about your ethnicity and health.

What we use your information for

- 2.4 We use your information to be able to provide you with advice and support.

Our confidentiality policy

- 2.5 At Citizens Advice we have a confidentiality policy which states that anything you tell us as part of advice will not be shared outside of the Citizens Advice network unless you provide your permission for us to do so. There are some exceptions to this such as needing to share:
- to prevent an immediate risk of harm to an individual;
 - In select circumstances if it is in the best interests of the client;
 - where we are compelled to do so by law (e.g. a court order or meeting statutory disclosures)

- where there is an overriding public interest such as to prevent harm against someone or to investigate a crime;
- to defend against a complaint or legal claim; and
- to protect our name and reputation for example to provide our side of a story reported in the press.

Who we share your information with

2.6 Third-party text companies.

Our lawful basis for using your information

- 2.7 There are a number of grounds under GDPR that we rely on as the lawful basis for using your information for giving you advice, information and guidance:
- For your personal data:
 - Article 6(f) – Legitimate interest
 - For your special category and criminal offence data:
 - Article 9(2)(f) – Establishment, exercise or defence of legal claims; and
 - Article 9(2)(g) – Substantial public interest (confidential counselling, advice or support)

3. How we use your data for research, feedback and statistics

3.1 This section covers how we use your data to carry out our research, feedback and statistical work. National Citizens Advice covers their use of data for this purpose in their [privacy notice](#).

How we collect your information

3.2 We collect your data through paper and online feedback surveys.

What information we collect

- 3.3 We collect the following information about you:
- Your name
 - Your satisfaction with our service

What we use your information for

3.4 We use this information to monitor our service and identify areas for improvement.

Who we share your information with

3.5 Anonymised data may be shared with funders.

Our lawful basis for using your information

- 3.6 There are a number of grounds under GDPR that we rely on as the lawful basis for using your information for research, feedback and statistics:
- For your personal data:
 - Article 6(f) – Legitimate interest

- For your special category and criminal offence data:
 - Article 9(2)(j) Archiving, research and statistics

4. How we use your data when applying to work or volunteer

4.1 See Volunteer and Staff Privacy Notices.

5. How we use your data when using our website

5.1 See 2. How we use your data for advice above.

6. How long we keep your data for

6.1 National Citizens Advice is responsible for managing any data in joint client cases records. For more information please see their [privacy notice](#).

6.2 For other data we hold, please see our Data Retention Policy.

7. Third party processors

7.1 Third party processors are other organisations that carry out data processing on our behalf. Third party processors don't use data for their own purposes and we have agreements in line with data protection law.

7.2 Our third party processors include our IT support provider and our payroll provider.

8. Your data protection rights

8.1 You have rights in relation to your personal data that we hold. Your rights include being able to request:

- Access to copies of your data
- Corrections are made to inaccurate data
- Deletion of your personal data
- Object to how we use your personal data

8.2 These rights are not absolute and may not apply in every circumstance. For more information about your rights you can visit the [ICO website](#).

8.3 To make a data protection rights request you can do so by emailing advice@casws.org.uk.

Raising a concern about how we use your information

8.4 If you are concerned about how we have handled your personal information please contact us at advice@casws.org.uk

8.5 You can also contact the national charity if you are unhappy with how we have used your personal data or wish to raise a concern about how a local office has handled your personal data. To do so you can email us at DPO@citizensadvice.org.uk

Contacting the Information Commissioner's Office (ICO)

8.6 You can also raise your concern with the Information Commissioner's Office which regulates data protection law in the UK. if you are unhappy with how we have used your personal information. They will normally expect you to have made a complaint to us directly in the first instance.

- [Visit the ICO website.](#)
- Address: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF
- Helpline number: 0303 123 1113