The Omega Course

Data Privacy Notice

Course applicants, attendees and interested parties

Personal Data as defined by GDPR

Personal data relates to a living individual who can be identified from that data. Identification can be by the information alone or in conjunction with any other information in the data controller's possession or likely to come into such possession. The processing of personal data is governed by the General Data Protection Regulation (the "GDPR").

The purpose of this Notice is to inform you what personal data we need to hold about you to enable us to run The Omega Course, provide you with updates and news, and send you invitations to future social and training events.

Our scope

The Omega course aims to enable people to think and discuss matters of death and dying, in a safe atmosphere, so fears can be addressed and plans made, such that people are freed to live life to the full for themselves, whilst reaching out and being good relatives, friends and neighbours to those that are sick, dying or bereaved.

In this way we aim to deliver increasing skill and confidence to populations to develop compassionate villages, towns and cities.

Our legal basis for processing your data

Consent

We shall seek consent from applicants & attendees for The Omega Course to hold their data. This will assist us in communicating with those people and passing on details about the course.

People who have attended the course may wish to remain on our contact list to receive follow up material and other information. We ask people for their consent to keep their contact details.

Other people, with an interest in the subject, are welcome to join our mailing list. We specifically ask their consent to keep their contact details for this purpose.

Personal Data we hold

Data will be confined to the minimum necessary, typically comprising: name, address, phone number, email address.

In addition, no data regarding children will be held but for bespoke courses for adults with learning disabilities data held will also include details about a responsible adult (typically: name, address, contact number, email address, relationship to the subject).

We may, in some circumstances need to keep a record of health information, for Health & Safety purposes;

For people giving donations to The Omega Course, we need to record some financial data to satisfy HMRC tax requirements. This data will be retained for 6 years.

Data processing

We shall use your personal data for the following purposes:

- To enable us to provide effective information giving and course administration for the benefit of attendees and, more widely, to invite people to future social and educational events
- To raise funds
- To manage our employees and volunteers
- For Health & Safety and Safeguarding purposes (where necessary)
- To maintain our own accounts and records (including the processing of Gift Aid applications to meet our legal obligations)
- To inform you of news, issues, events, activities and services this will typically be performed through the News Sheets
- To be able to invite you to take part in evaluations of the course and later events

Note that the facilitators, admin assistant and accounts assistant and Trustees are included in this notice, as they will access personal data in conducting various roles on behalf of The Omega Course under the legal basis for processing set out above.

Third parties

Information we hold may be disclosed to third parties in the following circumstances:

- To UK public authorities in the discharge of their lawful duties
- To healthcare bodies if during a course or afterwards in discussion a person was found to be a danger to themselves or to another person and required medical assistance and safeguarding

The Omega Course uses the personal computer of the lead facilitator which is password protected.

There is an exclusive email for the course use hosted by Zoho.com <u>courses@omega.rip</u>

Omega data is backed up to Dropbox.

Dropbox offers Europe-based storage of file blocks for qualified customers. The Dropbox infrastructure is hosted by Amazon Web Services (AWS) in Frankfurt, Germany and replicated within the Frankfurt region to ensure redundancy and protect against data loss. Metadata and Paper docs are stored in the United States for all customers.

To see the Dropbox approach to GDPR, click on this link: <u>https://aem.dropbox.com/cms/content/dam/dropbox/www/en-us/security/dropbox_gdpr_compliance_journey.pdf</u>

To see the Dropbox Security Whitepaper, click on this link: <u>https://open.spotify.com/user/119228500/playlist/3CltyKVgVND6XdPv6IsUMK?si=ZWIY7</u> <u>3M6RVCqJ_DgVseA2g</u>

To see the Dropbox Privacy Paper, click on this link: <u>https://www.dropbox.com/privacy</u>

We shall not disclose your personal data in any other circumstances without seeking your prior consent. For example, we shall not share your data with third parties to allow them to contact you about their events or activities separately (even if they are endorsed by The Omega Course.)

Security & Confidentiality

Your personal data will be treated as strictly confidential and will only be shared with other members of The Omega Course in order to carry out activities you have opted into. Printed data, where there is any, is kept securely in The Omega Course office. Electronic data is kept securely on a password protected computer.

Special Category data

As mentioned above, we may, in some circumstances need to keep a record of health information, for Health & Safety purposes (e.g. vulnerable adults).

Retention of your data

Your data will be held for seven years after which time it will be destroyed. https://ico.org.uk/for-organisations/guide-to-data-protection/principle-5-retention/#

Your rights

Unless subject to an exemption under the GDPR, you have the following rights with respect to your personal data: -

- The right to request a copy of your personal data which The Omega Course holds about you
- The right to request that The Omega Course corrects any personal data if it is found to be inaccurate or out of date
- The right to request your personal data is erased where it is no longer necessary for The Omega Course to retain such data
- The right, where there is a dispute in relation to the accuracy or processing of your personal data, to request a restriction is placed on further processing until the dispute is resolved
- The right to lodge a complaint with the Information Commissioners Office if you are not satisfied with the response you receive from The Omega Course

Whom to contact

To exercise all relevant rights, queries or complaints please in the first instance contact The Omega Course lead facilitator at <u>courses@omega.rip</u>

If your query or complaint cannot be satisfactorily handled, you can contact the Information Commissioner's Office on 0303 123 1113 or via email <u>https://ico.org.uk/global/contact-us/email/</u> or at the Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire. SK9 5AF.

Changes to this Data Privacy Notice

If it becomes necessary to use your personal data for a new purpose, not covered by this Data Privacy Notice, then we will provide you with a new notice explaining this new use prior to commencing the processing and setting out the relevant purposes and processing conditions.

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