
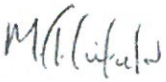




Starts with you

Starts with you Website Privacy Policy

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Managing Director Signature:	
Approval Date:	01/11/2022
Board Chair Signature:	

This policy should be read in conjunction with the following policies, procedures, and guidance:

- Data Protection Policy

1. Introduction

Starts with you Ltd. is committed to protecting your privacy and to maintaining the trust of our customers, clients, employees, and job applicants. This Privacy Notice explains how Starts with you (or “SWY” “we” or “our” or “us”) use any personal information that we may collect about you when you interact with us. It also explains how we will store, handle, and keep that data safe to provide confidence that we are handling your personal data, in accordance with the Data Protection Act 2018 (DPA) and General Data Protection Regulation (GDPR).

2. Policy Statement

This Privacy Policy is for this website www.startswithyou.org.uk and managed by Starts with you and governs the privacy of its users who choose to use it.

The Policy sets out the different areas where user privacy is concerned and outlines the obligations & requirements of the users, the website and website owners. Furthermore, the way this website processes, stores and protects user data and information is also included in this policy.

For the purpose of the General Data Protection Regulation (GDPR), the data controller is Starts with you Ltd., 98 Waters Meeting Road, Bolton, BL1 8SW.

Our Data Protection Officer can be contacted at info@startswithyou.org.uk.

3. Relevant Law

As of 1 January 2021, the law relating to data protection in the UK is governed by:

- The Data Protection Act 2018
- the retained EU General Data Protection Regulation 2016/679 (UK GDPR)
- the governing/supervisory body for upholding data protection rights is the Information Commissioners Office (the ICO).

4. When Do We Collect Your Information and What Information Do We Collect?

We collect your information:

- when you engage with us on social media
- when you use the “contact us” facility on our website with queries or complaints, or to report a problem with our website
- when you complete any surveys that we to send you
- when you book an appointment with us
- when you fill in any forms
- when you share information with us in writing or on the phone – that may be inputted to our systems
- when you permit a third party to share with us the information that they hold about you
- we collect data from publicly available sources (such as Companies House) where the information is made public as a matter of law
- when you apply for a job with us.

The kind of information and our reasons for processing it is listed at Appendix 1.

Where you do not provide sufficient personal data to allow us to respond to your enquiry, this may affect the service or response we are able to provide

5. Reasons for Collecting Personal Information

The type of information that we collect is limited to that which is necessary and is summarised in appendix 1.

5.1 To Deal with your Enquiries: For online or telephone enquiries, we will generally require basic information such as your name and contact details to be able to deal with your enquiry.

5.2 Business Purposes: When you enter a business relationship with us, the information that we will require will be of a more detailed nature and may include data such as your business address and contact details. We will need this information to ensure that we provide the requested services to you, and for general administrative purposes (e.g., managing your account, undertaking customer satisfaction surveys).

5.3 Website Registration: To register online to receive, for example, email alerts or access to certain documentation, we will require certain basic information from you together with confirmation of the alerts or documentation that you wish to receive.

6. Use of Cookies

Our website www.startswithyou.org.uk currently does not use cookies to better the users experience while visiting the website.

Other cookies may be stored to your computer’s hard drive by external vendors when the Starts with you website uses referral programs, sponsored links, or adverts. Users will need to check the third-party cookie policies for further information.

Our Site may, from time to time, contain links to and from the websites of our partner networks, advertisers, social media pages, and affiliates and platform support providers. If you follow a link to any other websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for their own policies. Please check the site's own policies before you submit any personal data to third party websites.

7. Sharing Your Information

We sometimes share your personal data with trusted third parties, including:

7.1 Any member of the Bolton at Home group of companies, which means our ultimate holding company and its subsidiaries, as defined in section 1159 of the UK Companies Act 2006.

7.2 Carefully selected third parties including:

- business partners and suppliers for the performance of any contract we enter into with you
- technology companies who support our website and other online systems (for example, our software hosting and development partners)
- analytics and search engine providers that assist us in the improvement and optimization of our website
- suppliers who carry out market research and customer satisfaction surveys on our behalf to ensure we are delivering a good service as well as identifying ways we can improve our services
- debt collection agencies, for the purpose of recovering unpaid debts due under our contract with you.

We may disclose your personal information to third parties for their own purposes in very specific circumstances, including if we are under a duty to disclose or share your personal data to comply with any legal obligation; or to protect the rights, or safety of Starts with you Ltd., our customers, or others.

This includes exchanging information with other organisations for the purposes of fraud protection.

8 How Do We Keep Your Personal Data Safe?

We have implemented appropriate technical and organisational measures to protect the confidentiality, integrity, and availability of your personal data against unauthorised, unlawful, or accidental loss, destruction, or damage, including:

- training for SWY employees in the importance of information security
- conducting a Data Protection Impact Assessment (DPIA) when the intended processing of your personal data is likely to result in a substantial risk to your rights and freedoms
- restricting access to your personal data
- contracts and data sharing agreements with other organisations to help them understand what they are allowed to do with your personal data
- regular system back-ups
- secure deletion and / or secured confidential waste disposal when your personal data is no longer required
- use of secure electronic transfer (e.g., email).

9 How Long Do We Keep Your Information?

Whenever we collect or process your personal data, we will only keep it for as long as is necessary for the purpose for which it was collected. At the end of that retention period, your data will either be deleted completely or anonymised (e.g., by aggregating it with other data so that it can be used in a non-identifiable way for business planning).

In certain cases, the law requires us to keep personal data for a specific period (e.g., The default standard retention period for HMRC records is 6 years plus current, otherwise known as 6 years +).

10 Your Data Protection Rights

Under data protection law, you have rights regarding your personal data:

- **your right of access:** you have the right to ask us for copies of your personal information
- **your right to rectification:** you have the right to ask us to rectify personal information you think is inaccurate. You also have the right to ask us to complete information you think is incomplete
- **your right to erasure:** you have the right to ask us to erase your personal information in certain circumstances
- **your right to restriction of processing:** you have the right to ask us to restrict the processing of your personal information in certain circumstances
- **your right to object to processing:** you have the right to object to the processing of your personal information in certain circumstances
- **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, in certain circumstances.

10.1 Access to Information

Data Protection Legislation gives you the right to access information held about you. If you would like to exercise your other rights in respect of, your personal data, you can make a subject access request to Starts with you, please complete our [Contact Form](#).

Please send your form to: info@startswithyou.org.uk or write to us:

Starts with you
Suite 2, Oceanic House
Navigation Business Park
94 Waters Meeting Road
Bolton
BL1 8SW

Please ensure that you follow the instructions within the form, such as the requirement to provide proof of your identity, as failure to do so may delay our processing of your request. You are not required to pay any charge for exercising your rights. If you make a request, we have one month to respond to you.

11 Why are We Not Subject to Freedom of Information?

We are a private social enterprise company and do not constitute a public authority under the Freedom of Information Act 2000 (FOIA) and Environmental Information Regulations 2004 (EIR). Therefore, we are not obliged, and we will not respond to, requests under such legislation as a matter of course. However, you can find corporate information that we have chosen to make publicly available in the 'About us' section of our website.

If you would like independent advice regarding our status under the FOIA and EIR, you may wish to contact the Information Commissioner's Office, which is the regulator for this legislation, by writing to:

Information Commissioner's Office
Wycliffe House,
Water Lane,

Wilmslow,
Cheshire,
SK9 5AF
or casework@ico.org.uk.

12 Questions or Complaints

If you have any questions or complaints about how we handle your personal data, please write to us at:

Starts with you

Suite 2, Oceanic House

Navigation Business Park

94 Waters Meeting Road

Bolton

BL1 8SW

Or email us at: info@startswithyou.org.uk

You also have a right to lodge a complaint with a Supervisory Authority, for example the Information Commissioner's Office:

Information Commissioner's Office

Wycliffe House

Water Lane

Wilmslow

Cheshire

SK9 5AF

Helpline number: 0303 123 1113

ICO website: <https://www.ico.org.uk>

13 Changes to Our Privacy Notice

Any changes we may make to our privacy notice in the future will be posted on this page and, where appropriate, notified to you by e-mail.

Appendix 1: Data collection

Data Subjects	Categories of Personal Data`	Purposes for Processing	Basis / Condition for Processing
Customers and clients	Personal data and / or special category data	Property repair and maintenance services	Because it is necessary as part of service delivery agreements
Customers	Personal data and / or Special category data	Support into work	With your consent ; or with your explicit consent relating to the support received to help you back to work
Customers	Personal data and / or Special category data	Welfare support (e.g., debt advice)	With your consent ; or with your explicit consent relating to the welfare support that you accessed
Customers and clients	Personal data and / or Special category data	General service enquiries	With your consent; or with your explicit consent relating to your service enquiry
Customers and clients	Personal data and / or Special category data	Legal requirements (e.g., criminal offences, court proceedings, insurance claims).	Because it is necessary for a legal obligation under the Criminal Justice Act 2015; or because it is necessary for the establishment, exercise, or defence of legal claims or where courts are acting in their judicial capacity. With your explicit consent relating to your legal requirements.
Customers and clients	Personal data and / or Special category data	Customer complaints, feedback, and service evaluation (e.g., in relation to service accessed)	With your consent; or because it is necessary for our legitimate interests which are linked to the service you accessed. With your explicit consent relating to your access to our services.
Employees	Personal data and / or Special category data	Payroll services (e.g., expenses, salaries).	Because it is necessary for our contract of employment with you. To carry out obligations under employment and social security and social protection law
Employees	Personal data and / or Special category data	Training & development	Because it is necessary for our contract of employment with you; or Because it is necessary for our legitimate interests which are

			<p>linked to your job.</p> <p>With your explicit consent relating to your job</p>
Employees	Personal data and / or Special category data	Health and safety (e.g., health and safety and / or risk assessments, occupational health, and public health)	<p>Because it is necessary for a legal obligation under health and safety regulation</p> <p>With your explicit consent relating to occupational health and safety.</p> <p>Where it is in your vital interests (GDPR Article 9 (2) (c)) To collect it for public health and or to fulfil a legal obligation (GDPR Article 9 (2) (i) as per the Coronavirus Act 2020 and for a COVID-19 Purpose, as defined by the Health Service (Control of Patient Information) Regulations 2002 To analyse your information (GDPR Article 9 (2) (j))</p>
Employees	Personal data and / or Special category data	Facilities management (e.g., access fobs, identity badges)	<p>Because it is necessary for our legitimate interests which are linked to your job.</p> <p>With your explicit consent</p>
Employees	Personal data and / or Special category data	Human resources (e.g., absence, employment contracts performance monitoring)	<p>Because it is necessary for our contract of employment with you.</p> <p>Because it is necessary for the purposes of preventive or occupational medicine, for assessing the working capacity of an employee, medical diagnosis, the provision of health or social care or treatment or management of health or social care systems and services on the basis of EU or Member State law or a contract with a health professional.</p>
Employees	Personal data and / or Special category data	Partnerships and communications (e.g., corporate events, corporate social media accounts, filming, and photographs for marketing)	<p>With your consent; or</p> <p>Because it is necessary for our legitimate interests which are linked to your job.</p>
Employees	Personal data and / or	On boarding new	Because it is necessary for our

	Special category data	starters (induction process)	contract of employment with you. With your explicit consent relating to your job.
Job Applicants	Personal data and / or Special category data	Recruitment and selection	Because it is necessary for our contract of employment with you. With your explicit consent relating to your job.
Others	Personal data and / or Special category data	Health and safety	Because it is necessary for a legal obligation under the Health & Safety at Work Act 1974. Because it is necessary for the purposes of carrying out the obligations and exercising SWY's or SWY workers' specific rights in the field of employment law.