

# **Thurrock Lifestyle Solutions**

# **A Community Interest Company**

7<sup>th</sup> floor Thameside Complex, Orsett Road, Grays Essex RM17 5DX



# **Privacy Policy**

May 2025

PATT ADHD Support is wholly owned and operated by Thurrock Lifestyle Solutions and is therefore bound by Thurrock Lifestyle Solutions policies.

Review date May 2027



#### 1. Introduction

Thurrock Lifestyle Solutions (TLS) is committed to protecting the personal data of the individuals it supports and those working within the organisation. This policy outlines how TLS collects, stores, uses, and protects personal data in compliance with the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018.

The General Data Protection Regulation (GDPR) is a key piece of legislation that governs the collection, processing, and storage of personal data within the UK and across the EU. As a small UK social enterprise, we are committed to ensuring that all personal data we handle is processed lawfully, fairly, and transparently, in accordance with GDPR requirements.

We only collect data that is necessary for our operations, ensure it is kept secure, and retain it only for as long as necessary. Individuals have the right to access their data, request corrections, or ask for it to be deleted. We regularly review our data protection practices and provide staff, freelancers and directors with appropriate training to maintain compliance and safeguard our customers' and employees' personal information.

## 2. Scope

This policy applies to:

- All directors, freelancers, employees (including the apprentice), and volunteers of TLS.
- All personal data processed in relation to individuals and organisations supported by TLS.
- All data systems, including cloud-based storage, used to manage personal data.

#### 3. What Personal Data We Collect

**TLS** holds limited personal data, primarily:

- Names
- Email addresses
- Phone numbers
- Business or organisation names (if applicable)
- Business postal addresses

This information is collected directly from individuals who seek or have received support from TLS and much of it is publicly available.

## 4. Purpose of Data Processing

Personal data is processed solely for the following purposes:

- To communicate with individuals who have sought support as a social entrepreneur
- To provide ongoing support and resources to social entrepreneurs
- To keep individuals informed about services and relevant updates (where consent has been given)

## 5. Legal Basis for Processing

**TLS** processes personal data under the following legal TLS:

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- **Consent** where individuals have opted in to receive communications
- **Legitimate Interests** to deliver support services to individuals who have requested them
- **Legal Obligation** for maintaining accurate records required by law (e.g., for grant reporting or compliance)

# 6. Data Storage and Security

- All personal data is stored on secure, cloud-based systems with restricted access.
- Access to data is limited to authorised personnel only, including directors, freelancers, and the apprentice as necessary.
- Password protection and two-factor authentication are used to secure cloud access.
- Devices used to access data are regularly updated and protected with antivirus software.

# 7. Data Sharing

**TLS** does **not** sell or share personal data with third parties unless:

- It is required by law
- The individual has given explicit consent
- A data processing agreement is in place with any third-party service providers (e.g., cloud storage platforms)

#### 8. Data Retention

**TLS** retains personal data only for as long as necessary for the purposes for which it was collected. Typically:

Contact information will be retained for up to 3 years after the last point of contact unless the individual requests deletion sooner.

# 9. Data Subject Rights

Under the UK GDPR, individuals have the right to:

- Access the personal data TLS holds about them
- Request correction of inaccurate or incomplete data
- Request erasure of their data ("right to be forgotten")
- Object to or restrict processing
- Withdraw consent at any time
- Lodge a complaint with the Information Commissioner's Office (ICO)

To exercise any of these rights, individuals can contact:

Email: info@choiceandcontrol.co.uk

Address: 7th Floor, Thameside Complex, Orsett Road, Grays RM17 5DX

#### 10. Data Breaches

Any suspected data breach will be investigated promptly. If a breach is likely to result in a risk to individual rights and freedoms, it will be reported to the ICO within 72 hours, and affected individuals will be informed where appropriate. S@CiAL WE'RE A

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# 11. Roles and Responsibilities

- **Directors** are responsible for ensuring compliance with this policy.
- Freelancers, employees and volunteers must follow this policy and report any concerns immediately.
- A designated data protection lead may be appointed for ongoing oversight (optional).

# 12. Review and Updates

This policy will be reviewed annually or sooner if significant changes occur in legislation, data processing activities, or organisational structure.

Approved by: Neil Woodbridge, CEO

