

PRIVACY NOTICE

Contact details

Post: Talking Money, 1 Hide Market, West Street, St. Philips, Bristol, BS2 0BH, GB

Telephone: 01179 543990, 0800 1214511

Email: mail@talkingmoney.org.uk

Introduction

Talking Money is committed to protecting your privacy and security. This notice explains how and why we use your personal data, to ensure you remain informed and in control of your information.

Questions?

Any questions you have in relation to this privacy notice or how we use your personal data should be sent to mail@talkingmoney.org.uk or addressed to The Data Controller, Talking Money, 1 Hide Market, West Street, St Philips, Bristol BS2 0BH

What is personal data?

Personal data is information that can be used to help identify an individual, such as name, address, phone number or email address.

Special category data is "Sensitive Personal Data" revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, trade-union membership; data concerning health or sex life and sexual orientation; genetic data or biometric data

The policy in brief

Here is a brief summary:

- We collect personal data (as outlined above) to be able to carry out work on behalf of service users, to fundraise for our work and for administration, research and analysis purposes.
- We do our very best to keep your personal information safe and secure.
- We only share data where we are required by law or with carefully selected partners who do work for us or fund the work that we do. We never sell your data, and we will never share it with another organisation for marketing purposes.
- We will only retain your data for as long as it is required.

These are the basics, but you can read the full Privacy Notice below. We have broken down the information into the following sections.

[Data we collect to operate our services](#)

[Data we collect for marketing purposes](#)

[Data we collect for recruitment and HR purposes](#)

[How we keep your data safe and your rights](#)

1. Data we collect to operate our services

1.1 What information we collect and why?

To **provide services** we may collect and process personal information about you such as:

- Name, address and contact details (e.g., phone number, email address)
- Date of birth
- National Insurance Number
- Spoken languages
- Household and employment details
- Credit reference information
- Call recordings with consent
- Records of meetings and casework specific notes
- Identification documents
- Payment details (including bank information for transfers)
- Information relating to compliments or complaints

Providing we have explicit consent; we also collect and use the following information to **provide and improve our services**:

- Gender identity and if this is different to sex assigned at birth
- Racial or ethnic origin
- Religion or faith beliefs
- Sexual identity/orientation
- Health information (including health conditions and disabilities)

It is your choice what information you share with us, however if you do choose to withhold requested information that is needed to progress your case, we may not be able to provide you with certain services.

We will only collect personal information where this is strictly necessary for legitimate organisational purposes, and we will only collect the minimum personal information required for these purposes.

We may collect Special Category Data 'Sensitive Personal Data' for the purposes of creating statistics to report to funders and improve accessibility and representation. This data will always be anonymised.

With your consent, we may use Special Category Data 'Sensitive Personal Data used to advance your case. An example of this is using health information to help with a claim for health-related benefits.

To help us continually improve the services we provide, we may contact you to ask for feedback. You do not have to provide this. If you do, we will analyse this information to improve the quality and effectiveness of our work.

We produce internal documents using your data in order to monitor and improve our activities.

We may process data contained in or relating to any communication that persons or entities have with us. The correspondence data may include the communication content and metadata associated with the communication. The correspondence data may be processed for the purposes of communicating with them and record-keeping.

When necessary by law, data may be used for the establishment, exercise, or defence of legal claims, whether in court proceedings, or in an administrative or out-of-court procedure, or in order to protect your vital interests or the vital interests of another natural person.

1.2 Lawful bases

Our lawful bases for collecting or using personal information to **provide our services** are (at least one of the following):

- The legitimate interest of the charity: We collect and use personal information to provide a service to clients to fulfil the charity's obligations. For example, we use your personal details to keep in contact with you while you are using our services, without these we would not be able to contact you.
- Consent: when we ask for special category data, we explain why we are asking and seek clear consent to process that data.
- Legal obligation: We are regulated by the Financial Conduct Authority, and they require us to collect some personal information.

1.3 Where we get personal information from

- People directly: we will ask for information when you contact us to access our service.
- Referrals: we may receive referrals from other organisations with whom we have data-sharing agreements, or where there is explicit consent from the individual to share their information with our service.

1.4 How we'll store your information

We'll store the record of your case in a secure case management system Advice Pro, which is only accessed by Talking Money staff. Paper copies of your information may also be stored securely and accessed by staff and volunteers of Talking Money.

1.5 How long we keep information

- Records held on our case-management software, Advice Pro, are automatically deleted after six years.
- Client files are deleted from our network drive after a case has been closed for six years.
- Printed data will be shredded as soon as possible. Confidential waste bins are provided for the collection and subsequent shredding/destruction of confidential documents.

1.6 Who we share information with:

- With consent, we may need to share personal data with other organisations or partner agencies to advance a case.
- We may share anonymised statistical data with our funders to evidence our work.
- We will only share information with those that abide by the requirements of the General Data Protection Regulation.
- Disclosures required by law - the law can require the disclosure of information for various reasons, in such circumstances Talking Money must comply with those requests.

We allow some external companies access to our data so they can store and process it on our behalf. We share data with the following Data processors:

➤ **IT support**

This data processor does the following activities for us: They manage our IT system and manage the storage of our digital data online.

➤ **Web-based case management company Advice Pro**

This data processor does the following activities for us: They provide a case-management system that stores and processes client data.

➤ **Others we share personal information with**

- Organisations we need to share information with for safeguarding reasons
- External auditors or inspectors

2. Data we collect for marketing purposes

2.1 What information we collect and why?

For **marketing purposes**, we may collect and process personal information such as:

- Name, address and contact details (e.g., phone number, email address)
- Marketing preferences
- Records of consent, where appropriate
- Website user information (including cookie tracking and location data)
- Photographs or video recordings

2.2 Lawful bases

Our lawful bases for collecting or using personal information for **service updates or marketing purposes** are:

- Consent: We ensure that individuals actively opt-in to receive marketing communications so we will only keep this data if you have signed up to our mailing list.

2.3 Where we get personal information from

- People directly: we will ask for information when you sign up to our mailing list

2.4 How long we keep information

- As long as consent is not withdrawn, your details will be retained indefinitely. We will provide frequent reminders and opportunities to withdraw consent.

2.5 Who we share data with

We allow some external companies access to our data so they can store and process it on our behalf. We share data with the following Data processors:

2.6 IT support

This data processor does the following activities for us: They manage our IT system and manage the storage of our digital data online.

3. Data we collect for recruitment and HR purposes

For **recruitment purposes** we may collect and process personal information about you such as:

- Name, address and contact details (e.g., phone number, email address)
- Date of birth
- National Insurance number
- Copies of passports or other photo ID
- Employment history (eg CV, job application, employment references or secondary employment)
- Education history (eg qualifications)
- Evidence of right to work in the UK
- Details of any criminal convictions (eg Disclosure Barring Service (DBS), Access NI or Disclosure Scotland checks)
- Induction information such as contract of employment, confirmation of job offer, bank account details and emergency contacts
- Correspondence – including disciplinary procedures, appraisals and resignations
- Arrangements relating to periods of leave – paid or unpaid e.g., parental leave
- Training information
- Supervision notes/Appraisal notes

Providing we have explicit consent; we collect and use the following information for **recruitment purposes** to drive our equalities agenda and increase diversity and representation.

- Gender identity and if this is different to sex assigned at birth
- Racial or ethnic origin
- Religion or faith beliefs
- Health information including disability
- Sexual identity/orientation

After induction and with consent, we may also hold documents relating to staff disability and health conditions where related to reasonable adjustments in the workplace and/or extended periods of absence due to sickness, including Statements of Fitness for Work and Self-Certification Sickness forms.

We will only collect personal information where this is strictly necessary for legitimate organisational purposes, and we will only collect the minimum personal information required for these purposes.

When necessary by law, data may be used for the establishment, exercise, or defence of legal claims, whether in court proceedings, or in an administrative or out-of-court procedure, or in order to protect your vital interests or the vital interests of another natural person.

3.1 Lawful basis

Our lawful bases for collecting or using personal information for **recruitment purposes** are:

- Contract: where we need to take steps at your request prior to entering into a contract.
- Legal obligation: where we need to comply with employment law
- Legitimate interest: pursuing the objectives of the charity by employing staff and contractors; managing the recruitment process; conducting due diligence on prospective staff and performing effective internal administration.

3.2 Where we get personal information from

- People directly: we will ask for information in the job application process
- In some instances, we may have been provided with your details from a third party such as a recruitment agency
- If we offer you a job, we may also collect personal information from other external third parties, such as references from current and former employers and criminal record checks from the Disclosure and Barring Service (DBS); depending on the job you have been offered

3.3 How long we keep information

We will only retain your personal information for as long as is necessary to fulfil the purposes of the recruitment process. If your application for employment or engagement is unsuccessful, we will hold your personal information for twelve months after the end of the relevant recruitment process. It will

be destroyed after this date. Applicants can ask us to remove your data before this time if you do not want us to hold it.

If you have provided consent for Talking Money to keep your personal information on file for in case there are future suitable employment opportunities with us, this will be held for an indefinite period or until you withdraw your consent.

If your application for employment or engagement is successful, personal information gathered during the recruitment process will be retained for the duration of your employment or engagement and in accordance with the privacy notice for employees, workers and contractors. Once your employment with Talking Money has ended, we will retain the file for six years before deleting it unless you request for it to be deleted before this time.

Personal information which is no longer to be retained will be securely and effectively destroyed or permanently erased from our IT systems.

3.4 Who we share data with

If you are offered a position, we may share your data, such as gathering references, obtaining a Disclosure and Barring Services/Disclosure Scotland check (depending on the role), or obtaining a prison clearance (depending on the role). You will be informed beforehand unless the disclosure is required by law. On the application form, you are asked to complete the referee details and can tick permission to contact the referee. If you tick yes, once offered a role, we will automatically send out reference requests. If tick no, we will contact the successful candidate for permission first.

We also allow some external companies access to our data so they can store and process it on our behalf. We share data with the following Data processors:

3.5 IT support

This data processor does the following activities for us: They manage our IT system and manage the storage of our digital data online

4. How we keep your data safe and your rights

4.1 Keeping your information safe and secure

We place great importance on the security of all personally identifiable information. We have security measures in place to protect against the loss, misuse and alteration of personal data under our control.

4.2 Your data protection rights

Under data protection law, you have rights including:

- **Your right of access** - You have the right to ask us for copies of your personal data.
- **Your right to rectification** - You have the right to ask us to rectify personal data 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 data in certain circumstances.

- **Your right to restriction of processing** - You have the right to ask us to restrict the processing of your personal data in certain circumstances.
- **Your right to object to processing** - You have the right to object to the processing of your personal data in certain circumstances.
- **Your right to data portability** - You have the right to ask that we transfer the personal data you gave us to another organisation, or to you, in certain circumstances.
- **Your right to withdraw consent** – When we use consent as our lawful basis you have the right to withdraw your consent.

You don't usually need to pay a fee to exercise your rights. If you make a request, we have one calendar month to respond to you.

To make a data protection rights request, please contact us using the contact details at the top of this privacy notice.

To find out more about what these rights mean for you, refer to the Information Commissioner's website: <https://ico.org.uk/>

How to complain

If you have any concerns about our use of your personal data, you can make a complaint to us using the contact details at the top of this privacy notice.

If you remain unhappy with how we've used your data after raising a complaint with us, you can also complain to the ICO.

The ICO's address:

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

Helpline number: 0303 123 1113

Website: <https://www.ico.org.uk/make-a-complaint>

Other websites

Our website contains links to other websites. This privacy policy only applies to this website so when you link to other websites you should read their own privacy policies.

Changes to our Data Protection Policy

We keep our Data Protection Policy under regular review and we will place any updates on this web page. This Data Protection Policy was last updated in December 2024.