

## RHA BENEVOLENT FUND

### GENERAL PRIVACY POLICY

This document sets out what information the Road Haulage Association Benevolent Fund (RHA-BF) collects from applicants, how it uses the information, how it protects the information and your rights.

RHA-BF is committed to ensuring your privacy is protected in accordance with Data Protection Standards.

RHA-BF is using the following definition for Personal Data:

Personal data	Information relating to identifiable individuals, such as job applicants, current and former employees, agency, contract and other staff, clients, suppliers and marketing contacts.  <i>Personal data we gather may include: individuals' contact details, addresses, dependent information, employment history, financial and pay details.</i>
Sensitive personal data	<i>Personal data about an individual's racial or ethnic origin, political opinions, religious or similar beliefs, trade union membership (or non-membership), physical or mental health or condition, criminal offences, or related proceedings—any use of sensitive personal data will only ever be carried out with the express permission of the individual.</i>

RHA-BF may change this policy from time to time by updating this page. This policy is effective from **25<sup>th</sup> May 2018** but we ask you to check this page from time to time. Any updates or changes to the use of your personal data will be advised to you, prior to that change of use.

#### Who We Are?

**Road Haulage Association Benevolent Fund, Roadway House, Bretton Way, Bretton, Peterborough, PE3 8DD (Registered Charity 1082820)**

#### Contact Us

On-Line : <https://www.rha.uk.net/about-us/rha-benevolent-fund>

Email : benevolentfund@rha.uk.net

Phone : 01733 261 131

Post: The Secretary to the Trustees, Road Haulage Association Benevolent Fund, Roadway House, Bretton Way, Bretton, Peterborough, PE3 8DD

## **What services do we provide?**

We provide the following services:

- Process applicant claims for financial assistance in accordance with the fund rules ('Trust Deed')

## **What we collect**

The specific information that we collect will vary depending on what services we provide you, or what you either provide us explicitly e.g. making a request for assistance, donating, signing up to a newsletter.

Typical information will include some or all the following depending on the services we are providing you:

Identification and contact data – Email Address, Name, Phone Number, Postal Address

Financial Data – your financial status – in order that we can assess your claim for assistance

Employment Data – relating to your employment to a past or present RHA member. This may include payslips.

Health Data – Where there is a need to protect you, our clients or other members of staff we may need to collect specific health data.

Criminal Records – Where there is a need for us to undertake enhanced verification or legal checks for you to work in our sector or for us to undertake specific services on your behalf.

## **Collecting Personal Data**

When we collect personal data, you will be provided with a Privacy Notice that will detail:

1. Who we are
2. What personal information we are collecting
3. Why we need it
4. Legal Basis under which we are processing (typically 'Consent', 'Contractual Obligations' and/or 'Legitimate Interest') (<https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/lawful-bases-for-processing/>)
5. What we are going to use it for and any decisions (automated or human) that it will be used for
6. Who that information will be shared with
7. The safeguards we have put in place to protect your information
8. Our standard retention period or legal need to retain that information
9. Your rights

Some of the information we collect is provided here:

- Personal Identification Data – Email Address, Name, Phone Number, Postal Address

- Sensitive Personal Data – Health/Medical/Wellbeing, Religious, Racial. *Whilst this is not explicitly requested by us, we often find that individuals provide this on claim application forms for assistance.*
- Legal Status – your legal status in respect of the services we are undertaking for you, and/or the status of those that can act on your behalf.
- Financial Status – due to the nature of our fund, we must undertake a basic financial assessment before being able to consider claims. We do not share this information with any third-parties.

### **How we collect Personal Data**

Depending on the nature of our engagement we may collect personal data in a variety of ways.

- We may collect this information directly from you
- We may collect this information from your relative or a provider making a claim on your behalf

### **What we use that Personal Data for**

The specific use of Personal Data will be detailed in the relevant Privacy Policy for the specific service(s) we are providing you.

But as a general guide we use Personal Data to:

1. Deliver the services that we have contracted with you to provide. In these circumstances the legal basis of processing is likely to be Contractual Obligation which will be detailed in the relevant Privacy Policy for that service. Depending on how you have asked us to communicate with you e.g. Phone, Text Message, Email, or how we are required to communicate with you e.g. secure Royal Mail deliveries we will use one or many of the methods you have provided us with. In some cases, we may be required by law or for security reasons to communicate with you in a specific manner. This will be made clear in the relevant Privacy Policy.
2. To pass your details on to third-parties so that they may provide you the services that we have financed e.g. paying an invoice or charge, delivering goods/services that we are funding following a successful application for assistance.

This list is not exhaustive but designed to provide you indicative uses of your personal data. Please ensure you read the appropriate Privacy Policy for the product or service we are providing you for specific information.

### **Automated Decision Making**

We do not undertake any automated decision making. All decisions on claims are assessed by a human being with the appropriate degree of consideration, respect and security.

### **Links to other sites**

We may provide, from time to time, links to other sites via our newsletter, blog article or other web links.

Because we have no control over these sites, we cannot take responsibility for the practise they may undertake in respect of privacy and/or protecting your Personal Data. We would therefore

advise you to satisfy yourselves that these sites are operating privacy policies that inform you how they handle and protect your data – as we cannot take any responsibility for this.

### Social Media Widgets and Links

You are probably familiar with the Facebook “Like” button and the various “Share” buttons that are available to users of the internet.

We sometimes use these to allow us to promote our services to other people as well as get feedback as to what articles, pages or blogs are of interest.

These other service providers may collect Personal Data about you, such as IP address, pages you visit on our site and may set their own cookies to enable them to function properly. In much the same way as *Links to other sites* do not allow us to enforce our policies, we would suggest that you undertake the same checks regarding the privacy policy of the company providing those features.

### Third Parties – Service Providers, Business Partners and others

During the provision of the service to you, we may be required to pass your details onto third parties either to verify your identity or to deliver goods or services that we have agreed to fund, some examples are:

Service Provider or Provider Type	Service Provided to us or you
Road Haulage Association	The Road Haulage Association Benevolent Fund is managed and run by the Road Haulage Association (RHA). Limited numbers of staff from the RHA have access to the claims made to the charity and this information is only provided in order to process such claims.
Credit Agencies	To pay invoices or arrears – this information will be provided by the claimant
Government Agencies e.g. Council Tax Office, HMRC, Housing Association etc	To pay invoices or arrears – this information will be provided by the claimant
Misc/ Third Parties	Where you have nominated a third-party to provide goods or services, we may need to pass on your details (name, address, contact details e.g. phone, email) in order to allow them to deliver the goods or services to you. We will do this on the basis of contractual obligation

In most cases you will be made aware of the parties that we share information with, prior to us sharing this information.

## **Trustee's**

Because we are a charity, we are governed by a team of trustee's who may be involved in the decision-making process relating to claims.

All applications are anonymised prior to consideration by the trustee board and at no time will any member of the board be aware of an individual's identity.

Once a decision is made, the application is passed back to the finance team to undertake the necessary arrangements.

## **Where we may share your information without your explicit consent**

We may be required or chose to share your information in certain circumstances without obtaining your explicit consent, some examples of this would be:

- To comply with any legal process, applicable law or governmental request e.g. warrant, summons, statutory reporting, court documents, sharing of evidence, sector specific compliance etc.
- To enforce/administer our agreements
- To protect your vital interests in the event you are unable to provide your consent
- To protect our organisation or the public from harm or illegal activities
- For fraud prevention, investigation, risk assessment
- To protect the rights and property of our company
- To defend ourselves against third-party claims or allegations
- To protect the rights or freedoms of other data subjects

In any event, we will consider your rights and privileges before sharing this information.

## **Your Rights as a Data Subject**

Available to view online :

<https://www.rha.uk.net/about-us/rha-benevolent-fund>

## **How you can help protect your Personal Data**

In all cases, the information we require to obtain for you is necessary in the provision or assessment of the provision of services to you. We rely on this information being accurate and up to date, which is in part our responsibility as well as yours.

We only record information relevant to the provision of the service we are delivering to you. However, in many cases you can limit the use of your information for services that do not require your data e.g. you can opt-out of receiving our newsletter.

## **Changes to your Personal Data**

In the event that your Personal Data, that we use to provide you goods or services, changes e.g. your surname, address, email address or Sensitive Personal Data E.g. Religion, Health Data – it is critical that you inform us of these changes to ensure we have the correct information on our

systems. Where you have access to administer these changes yourself we would expect you, if you are able, to update these details accordingly or else inform us of changes as soon as possible.

You should inform us in writing, by email, by telephone or in person – however we may also need to undertake further identity verification depending on the nature of the requested update.

## **Security**

RHA-BF operates against a Privacy by Design and By Default policy. This means that before we use your data we have already considered the potential impact on you were your data to be lost, stolen, shared or compromised.

We undertake routine reviews of our processes and security policies to ensure that we can take all reasonable precautions in protecting your data.

Where at all possible we encrypt all information that is either stored or transmitted to third-parties. Where data is stored or transmitted to a Third Country (any country outside of the European Economic Area (EEA)) we will ensure appropriate adequacy protection is in place in accordance with Data Protection Legislation.

Consequently, we may also need to sometimes undertake further security and screening questions when undertaking our routine dealings with you these are there to protect your personal data and security.

Whilst we undertake all reasonable precautions, encryption, software updates and patches, we cannot guarantee the safety of data transmitted over the internet.

## **Data Breach**

In the event of a Data Breach of your Personal Data, which means:

“The unintended loss, destruction amendment or disclosure of Personal Data”

We will first do all that is necessary to minimise the impact on you, identify any potential malicious third-party, identify any third-parties that may also be impacted and take all reasonable efforts to ensure that you are notified.

In the event that we are notified by a third-party of a breach, in their systems, we will undertake the same level of efforts.

We will undertake this communication either directly with you as an individual or by sending out a public notification.

At the same time, we will comply with the current law in respect of informing the appropriate Supervisory Authority which is currently the Information Commissioners Office (ICO). We are under a legal requirement to report Data Breaches to the ICO.