

Welcome to the ELKOLET CIO Privacy Notice



This information has been produced to help you understand everything you need to know about the way ELKOLET CIO collects, uses, and shares personal data, what your legal rights are and how to exercise them.

We hope you'll take some time to read this document; we've tried to keep it all as simple as possible and to avoid jargon, and we'll make our best efforts to keep you informed if there are any changes to the way we process your personal data in the future.

ELKOLET CIO takes its responsibility for protecting your data very seriously and we do advise you get to know our practices. If there's anything here you don't understand, or if you want to ask any questions, please feel free to contact us.

Who is the Data Controller?

We are ELKOLET CIO.

Registered Address: The ELKOLET Centre, Mill Lane, Alton, Hampshire, GU342QG

Charity Number: 1172970

In this document ELKOLET CIO may be referred to as "we", "us", or "our".

What Kinds of Personal Data does ELKOLET CIO Process?

We collect personal data for various purposes; with that in mind we have created a list of the types of personal data that we may collect, either directly from yourself or from other sources, in order to achieve those purposes.

Types of People:	Categories of Data:
Employees	Name, address, DOB, telephone, email address, usernames, work experience, CV details, education history, national insurance number, passport details, driver's license information which may include details of driving offenses, vehicle registration details, bank details, health information, gender, pension ID, tax information, work visa documents, national identification documents, criminal background checks, NOK information, job title, Image, religion, ethnicity
Emergency contacts	Name, relationship, telephone number, email address
Job applicants	Name, address, telephone number, email address, educational history, work experience, professional qualifications, CV details
Commissioners	Name, telephone number, email address, job title
Professional contacts	Name, telephone number, email address, job title, bank details, home address
Students	Name, DOB, gender, ethnicity/race, contact addresses, NOK contact details (telephone/email/name/address), health information, education history, professional bodies involved in care, sexual orientation, public protection notices (PPN), image

Special Category Personal Data

Personal data that is considered sensitive in nature are given special consideration in when they may be processed.

We may process the following types of special category personal data, under the included lawful basis.

Data Category:	Relating To:	Lawful Basis:
Racial or ethnic origin	Students	Provision of health or social care
Data concerning sex life or orientation	Students	Provision of health or social care
Racial or ethnic origin	Employees	Employment and social law
Religious or philosophical beliefs	Employees	Employment and social law

Lawful Basis Explained:

Employment and social law	It is necessary for us to carry out our obligations the field of employment and social security and social protection law.
Provision of health and social care	It is necessary for the purposes of preventive or occupational medicine, or for the provision of health or social care or management of healthcare systems and services.

What are the reasons ELKOLET CIO collects Personal Data?

Legal Obligations

We use personal data firstly to fulfil any contractual obligations that exist between us and yourself. Where we request personal data be provided to enter into, or meet the terms of any such contract, you will be required to provide the relevant personal data or we will not be able to deliver the goods or services you want. In such cases the lawful basis of us processing the personal data is that it is necessary for the performance of a contract.

We are required by law to process personal data for purposes relating to our legal obligations, these include:

- To provide for our financial commitments, or to relevant financial authorities.
- To comply with regulatory requirements and any self-regulatory schemes.
- To carry out required business operations and due diligence.
- To cooperate with relevant authorities for reporting criminal activity, or to detect and prevent fraud.
- To investigate any insurance claims, claims of any kind of harassment or of discrimination, or any other claim whereby the organisation may have to defend itself.

Consent

We may process personal data or the following reasons where we have sought your consent to do so:

- To send marketing material that promotes the goods and services of third-party organisations.

Legitimate Interests

We may process personal data for any of the following purposes, which are considered to be within our legitimate business interests:

- To provide goods and services where it has been requested.
- To inform people of other goods and services we provide or offers that may be of interest.
- To send information to people who have asked to be kept informed.
- To send notifications of any changes to the goods and/or services provided that may affect people.
- To recognise when people re-engage with us.
- To allow us to support and maintain our products in active service.
- To provide reference information to third party organisations when necessary.
- To improve our website so content is delivered more efficiently.
- To enhance the security measures in place that protect data we are responsible for.
- To protect our assets.
- To provide for and manage members of staff within the organisation

Where does ELKOLET CIO Obtain Personal Data from?

We collect personal data directly in various ways. This could include when you complete an online form, or if you provide the data directly to a representative of ELKOLET Humanitarian Developers.

Where it is necessary for us to achieve our business objectives, we may collect personal data from publicly accessible sources such as:

- LinkedIn, Social Media

We may also gather personal data by any of the following methods:

- By systems that gather data automatically from your computer equipment when visiting our online platforms.
- From systems that allow geographical location tracking, such as IP Address mapping, WiFi, GPS signals and cell tower positioning.
- From third-party organisations, where it is necessary to deliver a product or service that has been requested.
- From local or national authorities provided for specific purposes.

Who does ELKOLET CIO Share Personal Data with?

To achieve the above stated purposes for which we process your personal data, we may have to share information with certain third-party organisations. This may include where we are legally required to do so, or where it is strictly necessary in order to deliver a particular product or service.

We will make all reasonable efforts to ensure any third-party with whom we share personal data is compliant with data protection law.

The kinds of third-parties we may share your information with include:

- Members of a group of companies to which we belong.
- Organisations where it is necessary to provide goods and services or to achieve our business purposes.
- Government institutions or authorities

Where will ELKOLET CIO Store your Personal Data?

We do not transfer any personal data to countries, or organisations based in countries outside of the EU.

How Long will ELKOLET CIO Keep your Personal Data?

We will keep your personal data only for as long as required to achieve the purposes for which it is gathered.

The following criteria determine the period for which we retain personal data:

- Until we are no longer required to do so to comply with regulatory requirements or financial obligations.
- Until we are no longer required to do so by any law we are subject to.
- Until all purposes for which the data was originally gathered have become irrelevant or obsolete.

Your Rights, Our Responsibility

The Right of Access

This grants you the right to confirm whether or not your personal data is being processed, and to be provided with relevant details of what those processing operations are and what personal data of yours is being processed.

If you would like access to the personal data we have about you, we ask that you contact us using the details below.

The Right to Rectification

This one is fairly straight forward; if you notice that the data we have about you is inaccurate or incomplete, you may request we rectify the mistake. We will make every effort to respond to requests of this type immediately.

The Right to Erasure

Otherwise known as the 'right to be forgotten', this gives you the right to request your personal data be deleted.

This is not an absolute right; if you were to request that we erase your personal data, we would erase as much of that data as we could but may have to retain some information if it is necessary.

Were we have received a request for personal data to be erased, if it is necessary for us to retain some of that information we shall ensure that the remaining data is used only when and where it is absolutely necessary.

The Right to Objection

The right to object is a basic freedom all democracies enjoy. If you wish to object to the way we use, or have used, your personal data you may do so freely.

The Right to Complain

We will always try to maintain the highest standards and encourage the confidence our customers have in us as an organisation. To achieve this, we request that any complaints be first brought to our attention so we can properly investigate matters. If you would like to complain about ELKOLET CIO to a regulatory body, you may do so by contacting your local data protection supervisory authority.

The Right to Portability

This is a legal right afforded to you that states we must pass on all of the details you have provided to us in a machine-readable format, either to your or to another provider of your choosing.

ELKOLET CIO Contact Details

ELKOLET Humanitarian Developers
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The ELKOLET CIO Data Protection Officer

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