



Data Protection and Privacy Policy

HERE FOR GOOD

JUNE 2023



Privacy Policy

At Here for Good we take your privacy very seriously. Please read this privacy policy carefully as it contains important information on who we are and how and why we collect, store, use and share your personal data. It also explains your rights in relation to your personal data and how to contact us or supervisory authorities if you have a complaint.

When we use your personal data we are regulated under the General Data Protection Regulation (GDPR) and the Data Protection Act 2018 and we are responsible as 'controller' of that personal data for the purposes of the GDPR. Our use of your personal data is subject to your instructions, the GDPR, other relevant UK and EU legislation and our professional duty of confidentiality.

Scope of this Privacy Policy

Here for Good is a charity that was set up to provide free high quality immigration advice and vital support to vulnerable migrants where there are gaps in legal aid provision.

This Privacy Policy applies to your use of Here for Good's services, including when you request information from us and when you engage our advice services.

Data controller

When we use personal information about you or others in connection with providing our services to clients we do so as a data controller.

The types of information we process

We will process personal information we receive directly from you, on your behalf, other organisations or persons with whom you have dealings, government and judicial agencies, publicly available records and certain third parties.

We may collect current and historical personal information including/relating to, including:

- Your name, nationality and date of birth;
- Your address and contact details;
- Your photograph and identification documentation;
- Your marital status and details of your spouse / partner and other family



members



- Your travel and immigration history, both in the UK and overseas;
- Your employment status and history, including details of your current and past salary and benefits;
- Details of you and your family members' finances, savings, accommodation, income and expenses;
- Your national insurance and tax details;
- Your bank and/or building society details;
- Details of your online presence;
- Details of your personal history, including family life, studies and employment history;
- Your racial or ethnic origin, gender and sexual orientation, religious or similar beliefs;
- Your medical history and records;
- Details of criminal convictions, including spent convictions;
- Other personal information, including sensitive personal information, which may be relevant to your immigration matter.

How and why we use the information

Under data protection law, we can only use your personal data if we have a legitimate reason for doing so. It may be necessary for us to use your personal data in the following circumstances:

- For the performance of our contract with you or to take steps at your request before entering into a contract.
- In connection with a legal obligation (e.g. when we are carrying out conflict checks).
- You have provided your consent to such use (e.g. you have approved the use of a specific third party to assist on your matter).
- Where, within your reasonable expectations, we consider such use of your information as not detrimental to you, it is necessary to fulfil our legitimate interests or those of a third party (e.g. to be as efficient as we can so we can deliver the best service to you).
- To comply with our legal and regulatory obligations.

We also use your information to:

- Provide and improve our services to you;
- Maintain and develop our relationship with you;
- Facilitate our internal charitable operations;
- Fulfil our legal requirements and professional obligations;
- Monitor and analyse our services;
- Operational reasons, such as improving efficiency, training and quality control.



- Special Category Personal Data

We may collect from you Special Category Personal Data which includes personal data revealing racial or ethnic origin, political opinions, religious beliefs, philosophical beliefs or trade union membership, genetic and biometric data, and data concerning health, sex life or sexual orientation.

We will only use such Special Category Personal Data where it is necessary for the performance of our contract with you or to take steps at your request before entering into a contract, and where you have either provided your explicit consent to such use or its use is necessary for the establishment, exercise or defence of legal claims.

How we share the information

We may share your personal data with:

- Professional advisers who we instruct on your behalf or refer you to, e.g. barristers, other solicitors, medical professionals, accountants, tax advisors or other experts;
- Other third parties where necessary to carry out your instructions, e.g. courier services, translation / interpreting services, UK Visas and Immigration (the Home Office), HM Passport Office, HM Courts and Tribunals Service and third parties instructed on their behalf;
- Our insurers and insurance brokers;
- External auditors, e.g. in relation to the audit of our accounts;
- Our bank;
- We only allow our service providers to handle your personal data if we are satisfied they take appropriate measures to protect your personal data.

We may share your information with third parties where:

- You have consented for us to do so;
- We are under a legal, regulatory or professional obligation to do so (for example, in order to comply with anti-money laundering requirements);
- It is necessary for the establishment, exercise or defence of legal claims;
- It is required or will assist us in providing our services.
- We may disclose and exchange information with law enforcement agencies and regulatory bodies to comply with our legal and regulatory obligations.



Keeping your personal data secure

Information may be held at our places of work, third party agencies, service providers, representatives and agents. We have appropriate security measures to prevent personal data from being accidentally lost, or used or accessed unlawfully.

We limit access to your personal data to those who have a genuine need to access it in line with our charitable objectives. Those processing your information will do so only in an authorised manner and are subject to a duty of confidentiality.

We also have procedures in place to deal with any suspected data security breach. We will notify you and any applicable regulator of a suspected data security breach where we are legally required to do so.

How long your personal data will be kept

We will keep your personal data after we have finished advising or acting for you. We will do so for one of these reasons:

- To respond to any questions, complaints or claims made by you or on your behalf;
- To show that we treated you fairly;
- To assist with future matters that may you instruct us with;
- To keep records required by law;
- We will not retain your data for longer than necessary for the purposes set out in this policy. Different retention periods apply for different types of data. Your data will be kept for at least six years and, for certain relevant immigration matters, may be kept for at least 10 years in order for us to assist appropriately with future matters on your behalf.

When it is no longer necessary to retain your personal data, we will delete or anonymise the data, both in its physical and digital form (where relevant).

Promotional communications

We may use your personal data to send you updates (by email, text message, telephone or post) about legal developments that might be of interest to you and/or information about our services.

We have a legitimate interest in processing your personal data for promotional purposes. This means we do not usually need your consent to send you promotional communications. However, where consent is needed, we will ask for this consent



separately and clearly and you may opt out of receiving promotional communications at any time.

We will always treat your personal data with the utmost respect and never sell or share it with other organisations for marketing purposes.

You have the right to opt out of receiving promotional communications at any time by contacting us via email (contact@hereforgoodlaw.org) or by writing to: Data Protection, Here for Good Law, 15 Crosby Walk, London, E8 3DW.

We may ask you to confirm or update your marketing preferences if you instruct us to provide further services in the future, or if there are changes in the law, regulation, or the structure of the charity.

Your rights

We encourage you to contact us to update or correct your information if it changes or if you believe that any information that we have collected about you is inaccurate. If you would like to discuss or exercise the rights you may have, please contact us.

You have the following rights with respect to your personal data:

- Access to your personal information.
- Require us to correct any mistakes in your information which we hold.
- Require the erasure of personal information concerning you in certain situations.
- Receive the personal information concerning you which you have provided to us, in a structured, commonly used and machine-readable format and have the right to transmit those data to a third party in certain situations.
- Object at any time to processing of personal information concerning you for direct marketing.
- Object to decisions being taken by automated means which produce legal effects concerning you or similarly significantly affect you.
- Object in certain other situations to our continued processing of your personal information.
- Otherwise restrict our processing of your personal information in certain circumstance.

If you would like to exercise any of those rights, please:

- Email or write to us —see below: 'How to contact us'; and



- Let us have enough information to identify you (eg your full name, address and client or matter reference number);
- Let us have proof of your identity and address (a copy of your driving licence or passport and a recent utility or credit card bill); and
- Let us know what right you want to exercise and the information to which your request relates.

How to complain

We hope that we can resolve any query or concern you may raise about our use of your information.

The General Data Protection Regulation also gives you the right to lodge a complaint with a supervisory authority, in particular in the European Union (or European Economic Area) state where you work, normally live or where any alleged infringement of data protection laws occurred. The supervisory authority in the UK is the Information Commissioner who may be contacted at <https://ico.org.uk/concerns> or telephone: 0303 123 1113.

Changes to this privacy policy

If we make any material changes in the way we collect, use, and/or share the personal information that you have provided, we will notify you by posting notice of the changes in a clear and conspicuous manner on our website.

How to contact us

Please contact us by post or email if you have any questions about this privacy policy or the information we hold about you.

Our contact details are shown below:

Address: Data Protection, Here for Good, 15 Crosby Walk, London, E8 3DW

Email: contact@hereforgoodlaw.com