

SAFER LIVES LTD PRIVACY POLICY

We are committed to protecting your privacy when dealing with your personal information. This Privacy Policy sets out details of the information that we may collect from you and how we may use that information. Please read this Privacy Policy carefully. When using our website (the "**Website**"), this Privacy Policy should be read alongside, and in addition to, the Website terms and conditions.

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1. About us

1	About Us ▶
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2	<p>In this Privacy Policy references to "we" or "us" or "Safer Lives" are to:</p> <p>Safer Lives Ltd, a company registered in England and Wales (company number 11488488) with registered address at Dale House 64 Fink Hill, Horsforth, Leeds, England, LS18 4DH.</p> <p>We act as a data controller in respect of your personal information that we process.</p> <p>We have appointed a data protection representative to oversee our handling of personal information. If you have any questions about how we collect, store or use your information, you may contact our data protection representative by e-mailing us at dataprotection@saferlives.com.</p>
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2. What personal information do we process?

1	What personal information do we process? ►
2	The information that we collect and process will depend on our relationship with you. You can click the below for more information.

2	Clients ►
3	<i>Personal information ►</i>
4	<ul style="list-style-type: none"> • Your name • Your address • Your telephone number • Your email address • Your date of birth • Your bank details
3	<i>Special categories of personal information ►</i>
4	<ul style="list-style-type: none"> • Details of your physical or mental health (if relevant) • Details of your race and/or ethnicity

	<ul style="list-style-type: none"> Your political opinions, religious or philosophical beliefs, or trade-union membership Data concerning your sex life and/or sexual orientation
3	<i>Personal information relating to criminal convictions and offences</i> ►
4	<ul style="list-style-type: none"> Criminal offence data that relates to you (including offences and alleged offences and any court sentence or criminal conviction)

2	Family of clients ►
3	<i>Personal information</i> ►
4	<ul style="list-style-type: none"> Your name Your telephone number Your email address

2	Stakeholders such as solicitors, police officers, social services, counsellors/therapists, GP surgery ►
3	<i>Personal Information</i> ►
4	<ul style="list-style-type: none"> Your name Your telephone number Your email address

2	Suppliers and/or research partners ►
3	<i>Personal Information</i> ►
4	<ul style="list-style-type: none"> Your name Your telephone number Your email address

3. How do we collect that information?

1	How do we collect that information? ►
2	We collect personal information:

2	<ul style="list-style-type: none"> • face to face (directly from you and through third parties) • by telephone • by email
	<ul style="list-style-type: none"> • via our website

4. Who do we collect information from?

1	Who do we collect information from? ►
2	We collect personal information:
2	<ul style="list-style-type: none"> • from you • from your relatives (in case of clients)
2	<ul style="list-style-type: none"> • from other (internal) departments ►
3	Data is collected by accessing information held by our other internal departments. This includes access by the majority of departments to personal information held in our IT systems.
2	<ul style="list-style-type: none"> • from third parties ►
3	Stakeholders such as solicitors, police officers, social services, counsellors/therapists, GP surgery (in case of clients).
2	<ul style="list-style-type: none"> • from publicly available sources ►
3	In rare cases we use publicly available sources (e.g., Internet search engines and social media) to complete the conviction data we hold on our client data base.

5. What will we use your personal information for? ►

1	What will we use your personal information for? ►
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2	<p>We may use your personal information for a number of different purposes. In each case, we must have a "legal ground" to do so. We will rely on the following "legal grounds" when we process your personal information:</p> <ul style="list-style-type: none"> • We need to use your personal information to facilitate you entering into an agreement with us. • We need to use your personal information in order to protect the vital interests of the person whose personal information is being processed or of another person. • We need to use your personal information for a legitimate business purpose
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	<p>(e.g. to keep business and accounting records, manage our business operations and to develop and to improve our services). When using your personal information for these purposes, we will always consider your rights and interests.</p> <ul style="list-style-type: none"> • We have a legal or regulatory obligation to use your personal information. • We have your explicit consent. <p>If we use certain types of personal information known as "special categories of personal information" or "personal information relating to criminal convictions and offences", data protection law provides additional protections. We can rely on the following legal grounds when processing special categories of personal information or personal information relating to criminal conviction and offences data:</p> <ul style="list-style-type: none"> • You have given your explicit consent. • Schedule 1, Part 1, Sections 2 (health or social care purposes) and 4 (research) of the Data Protection Act 2018 ("DPA 2018"). • Schedule 1, Part 2, Sections 17 (counselling etc) and 18 (safeguarding of children and of individuals at risk) of the DPA 2018. • Schedule 1, Part 3, Sections 29 (consent) and 30 (protecting individual's vital interests) of the DPA 2018.
2	Purposes and legal grounds ►

2	Purpose for processing	Legal grounds for using your personal information	Legal grounds for using your special categories of personal information and/or personal information relating to criminal convictions and offences
	To set you up as a client	<ul style="list-style-type: none"> • It is necessary to enter into your agreement with us. • We have a relevant legal or regulatory obligation. • We have a legitimate 	<ul style="list-style-type: none"> • You have given your consent. • Schedule 1, Part 1, section 2 of the DPA 2018. • Schedule 1, Part 2, sections 17 and 18 of

		<ul style="list-style-type: none"> • business purpose. You have given your consent. 	<ul style="list-style-type: none"> • the DPA 2018. Schedule 1, Part 3, Sections 29 and 30 of the DPA 2018.
	To provide (intervention) services to you	<ul style="list-style-type: none"> • It is necessary to enter into your services agreement with us. We • have a relevant legal or regulatory obligation. • We have a legitimate business purpose. • You have given your consent. 	<ul style="list-style-type: none"> • You have given your consent. • Schedule 1, Part 1, section 2 of the DPA 2018. • Schedule 1, Part 2, sections 17 and 18 of the DPA 2018. • Schedule 1, Part 3, Sections 29 and 30 of the DPA 2018.

Communicating with you	<ul style="list-style-type: none"> • It is necessary to enter into your services agreement with us. We have a legitimate business purpose (to send you communications and to record and investigate communications). 	<ul style="list-style-type: none"> • You have given your consent. • Schedule 1, Part 1, section 2 of the DPA 2018. • Schedule 1, Part 2, sections 17 and 18 of the DPA 2018. • Schedule 1, Part 3, Sections 29 and 30 of the DPA 2018.
Complying with our legal or regulatory obligations	<ul style="list-style-type: none"> • We have a relevant legal or regulatory obligation. 	<ul style="list-style-type: none"> • Schedule 1, Part 1, sections 2 and 4 of the DPA 2018. • Schedule 1, Part 2, sections 17 and 18 of the DPA 2018. • Schedule 1, Part 3, Sections 29 and 30 of the DPA 2018.

Managing our business operations such as maintaining accounting records, receiving professional advice (e.g., tax or legal advice) or facilitating payment of our services	<ul style="list-style-type: none"> • We have a relevant legal or regulatory obligation. • We have a legitimate business purpose (to effectively manage our business operations). 	
Reviewing, assessing, tailoring and improving our service offerings	<ul style="list-style-type: none"> • We have a legitimate business purpose (to develop and improve our services to ensure client satisfaction) 	

	Investigating or detecting the unauthorised use of our systems, to secure our system and to ensure the effective operation of our systems	<ul style="list-style-type: none"> We have a legitimate business purpose (to ensure the integrity and security of our systems). 	
	Research and evaluation purposes, including sharing information with research partners	<ul style="list-style-type: none"> We have a legitimate business purpose (to discover trends, improve future services and understanding client group risks and needs) 	Schedule 1, Part 1, section 4 of the DPA 2018.
	Transferring or selling part of our business or reorganising our company structure	<ul style="list-style-type: none"> We have a legitimate business purpose (to manage our business portfolio and reorganise our company). We have a relevant legal or regulatory obligation. 	

6. Who do we share your information with?

1	Who do we share your information with? ►
2	Disclosures to other colleagues ►
3	Personal information is shared between our internal departments, for the purposes described in the privacy policy including:
3	<ul style="list-style-type: none"> Via internal reports Via access to central IT systems
2	Disclosures to third parties ►

3	In some cases, we also disclose your information to the third parties listed below for the purposes described in this privacy policy. You can contact us for details of specific disclosures made in respect of your information
2	• Auditors
2	• Solicitors
2	• Tax advisors/accountant
2	• Research partners
2	• Relevant authorities such as police officers, social services, counsellors/therapists, GP surgery
2	• IT providers / hosted IT solution providers

7. Marketing

1	Marketing ►
2	At the moment Safer Lives does not use your personal information to undertake direct marketing. We do however provide service flyers to police forces and solicitor firms which are distributed as part of welfare packs, and upon request.

8. How long do we keep personal information for?

1	How long do we keep personal information for? ►
2	We only keep personal information for as long as reasonably necessary to fulfil the relevant purposes described in this Privacy Policy or as otherwise required by law.

9. International data transfers

1	International data transfers ►
2	We will not transfer your personal information outside the United Kingdom.

10. Your rights

1	Your rights ►
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2	<p>Under data protection law you have a number of rights in relation to the personal information that we hold about you. These rights might not apply in every circumstance. You can exercise your rights by contacting us at any time using the details set out in this Privacy Policy (in the section 'About Us').</p> <p>Please note that although we take your rights seriously, there may be some circumstances where we cannot comply with your request such as where complying with it would mean that we couldn't comply with our own legal or regulatory requirements. In these instances we will let you know why we cannot comply with your request.</p> <p>When you contact us to exercise one of these rights, we may need to ask you for specific information to confirm your identity. This is a security measure to ensure that your personal information is not disclosed to any person who does not have the right to receive it. We may also contact you to ask for more information about your request to speed up our response.</p>
2	<ul style="list-style-type: none"> • The right to access your personal information ►
3	<p>Subject to any relevant exemptions, you are entitled to see a copy of the information we hold about you and request details of the processing undertaken including any disclosures made. To exercise your rights to access your personal information, please contact us on the details above.</p> <p>Your information will usually be provided to you in writing, unless otherwise requested, or where you have made the request by electronic means, in which case the</p>
	<p>information will be provided to you by electronic means where possible.</p>
2	<ul style="list-style-type: none"> • The right to rectification ►
3	<p>We take reasonable steps to ensure that the information we hold about you is reliable and as accurate and complete as is necessary for its intended use but you are entitled to ask us to update or amend any inaccuracies in the personal information that we hold about you. To request us to update or amend any information we hold about you, please contact us via the details set out in the 'About Us' section.</p>
2	<ul style="list-style-type: none"> • The right to erasure ►

3	<p>This is sometimes known as the 'right to be forgotten'. It entitles you, in certain circumstances, to request deletion of your personal information. For example, where we no longer need your personal information for the original purpose, we collected it for or where you have exercised your right to withdraw consent.</p> <p>Whilst we will assess every request, there are other factors that will need to be taken into consideration. For example, we may be unable to erase your information as you have requested because we have a regulatory obligation to keep it.</p>
2	<ul style="list-style-type: none"> • The right to restrict processing ►
3	<p>In certain circumstances, you are entitled to ask us to stop using your personal information, for example where you think that the personal data we hold about you may be inaccurate or where you think that we no longer need to use your personal information.</p>
2	<ul style="list-style-type: none"> • The right to withdraw your consent ►
3	<p>Where we rely on your consent in order to process your personal information, you have the right to withdraw such consent to further use of your personal information.</p> <p>Should you request your information is deleted and then wish to reengage for aftercare work we will likely need to revisit the work completed in paid for sessions.</p>
2	<ul style="list-style-type: none"> • The right to data portability ►
3	<p>In certain circumstances, you can request that we transfer personal information that you have provided to us to a third party.</p>
2	<ul style="list-style-type: none"> • The right to object to processing ►
3	<p>In certain cases you have the right to object to our processing, this arises in relation to where we process your personal data based on our legitimate business interests.</p>
	<p>Where we do so, you can object to such processing, unless our purpose outweighs any prejudice to your privacy rights.</p>
2	<ul style="list-style-type: none"> • Rights relating to automated decision making ►
3	<p>We do not carry out any automated decision making.</p>
2	<ul style="list-style-type: none"> • The right to object to marketing ►
3	<p>As set out in the 'Marketing' section, Safer Lives does not use your personal information to undertake direct marketing activities.</p>

2	<ul style="list-style-type: none"> • The right to make a complaint ►
3	<p>You have a right to file a complaint with the UK Information Commissioner's Office (ICO) if you believe that we have breached data protection laws when using your personal information.</p> <p>You can visit the ICO's website at https://ico.org.uk/ for more information. Please note that lodging a complaint will not affect any other legal rights or remedies that you have.</p>

11. Security

1	Security ►
2	<p>Information provided through our website is stored on our secure servers or those of any third party we engage to provide our IT platform, and is encrypted using standard technology, adhering to UK legislation.</p> <p>We have put in place procedures to deal with any suspected personal data breach, which means a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data transmitted, stored or otherwise processed. We will notify you and any applicable regulator (for example the Information Commissioner's Office) where we are legally required to do so.</p> <p>Where we have given you, or you have chosen, a password which enables you to access your account or certain parts of our website, you are responsible for keeping the password confidential and must not share it with anyone. You are responsible for any actions carried out using your password except where there has been fraud.</p>

12. Cookies

1	Cookies ►

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Cookies are small text files which are transferred from our website and stored on your computer's hard drive. They are widely used in order to make websites work, or work more efficiently, as well as to provide general usage information to website owners.

You can set your browser to refuse some or all browser cookies, or to alert you when a website sets or accesses cookies. If you disable or refuse cookies, some parts of our website may become inaccessible or not function properly. For information, please see our cookie policy.