# Privacy policy

Citizens Advice Oxfordshire (CAOX) has tried to ensure that the information on this website is accurate. However, CAOX will not accept liability for any loss, damage or inconvenience arising as a consequence of any use of or the inability to use any information on this website. Citizens Advice endeavours to provide a service of the highest quality. However, we cannot guarantee that our service will be uninterrupted or error-free. We are not responsible for claims brought by third parties arising from your use of this website.

For Citizens Advice latest Privacy Policy, please look here.

CAOX assumes no responsibility for the contents of linked websites. The inclusion of any link should not be taken as endorsement of any kind by Citizens Advice, of the linked website or any association with its operators. Further, we have no control over the availability of the linked pages.

# **CAOX Privacy Policy**

At CAOX, we collect and use your personal information to help solve your problems, improve our services and tackle wider issues in society that affect people's lives.

This privacy policy explains how we use your information and what your rights are. We handle and store your personal information in line with data protection law and our confidentiality policy. The following pages tell you more about how we use your information in more detail.

#### Our network

Citizens Advice is a membership organisation made up of the national Citizens Advice charity and many local offices across England and Wales, including CAOX. CAOX is an independent charity and a member of the national Citizens Advice charity.

All members of the Citizens Advice network are responsible for keeping your personal information safe and making sure data protection law is followed.

Members of the network also run some jointly designed services and use some of the same systems to process your personal data. In these instances we are joint data controllers for these activities.

### Jointly controlled data

All offices in the Citizens Advice network use some joint systems to carry out our activities. These include joint case management systems, telephony platforms and more.

Staff from a different local Citizens Advice can only access your personal information in a joint system if they have a good reason. For example when:

- you go to a different office to seek advice
- more than one office is working together in partnership
- they need to investigate a complaint or incident

We have rules and controls in place to stop people accessing or using your information when they shouldn't.

Tell an adviser if you're worried about your details being on a national system. We'll work with you to take extra steps to protect your information – for example by recording your problem without using your name.

National Citizens Advice has a <u>privacy notice</u> available on their website that covers general advice and nationally managed systems, including our case management systems. This policy covers the processing we carry out in our office.

## How we use your data for advice

This section covers how we use your data to provide you with advice.

For general advice and nationally funded advice programmes please see the national Citizens Advice <u>privacy notice</u>.

#### How we collect your information

**Direct Collection**: This involves gathering information directly through forms, applications, surveys, or during interactions such as meetings, emails, or phone calls.

**When you email us**, your emails are stored in our secure cloud storage, provided by Google Workspace – see below under "How We Store Your Information".

When you talk to an adviser about your case either in person or on the phone, any notes they make on your case will be stored in hard copy (for instance, in a notebook) or in secure electronic format temporarily, until the information is uploaded to our national case management system, Casebook. When the information has been uploaded to Casebook, any temporary electronic copies are deleted and any paper copies are securely destroyed by shredding.

When we see you face to face you may be asked to complete a Client Details form to obtain up to date information about your circumstances. This physical form along with any other physical paperwork will be stored in a secure filing cabinet for no longer than the statutory retention period for the type of data the information relates to.

For any other ways we collect your data, we use the <u>national Citizens Advice privacy policy</u>

#### What information we collect

For locally delivered advice, we typically collect the following types of information:

- **Personal Identification**: Name, contact details (email, phone number, IP address), and address for communication purposes.
- **Demographic Information**: Age, gender, ethnicity, and other characteristics that may be relevant for tailoring the advice or identifying specific local programs.
- Health or Social Care Information: In some cases, more specific data related to health conditions, disabilities, or social care needs may be collected, especially when the advice involves welfare, benefits, or health-related services.

- Local Context: This includes information about the individual's local circumstances such as employment status, housing situation, or any area-specific issues (e.g., local housing programs, community services).
- **Financial Information**: In certain cases, especially for advice on benefits, housing, or financial assistance, financial details like income, debts, and expenses may be gathered to assess eligibility for local support.

For more information on what we ask for see the national Citizens Advice privacy policy.

#### What we use your information for

We use the information collected for locally delivered advice for the following specific purposes:

- 1. **Personalised Advice**: Tailoring advice to an individual's unique circumstances, such as financial support, housing solutions, or health-related services, to ensure it is relevant and practical for their needs.
- 2. **Eligibility Assessment**: Determining whether individuals qualify for local programs or assistance, such as welfare benefits, housing assistance, or social care services, based on their personal, financial, and health-related information.
- 3. **Referral to Local Services**: Guiding individuals to appropriate local resources or services (e.g., healthcare, employment support, community programs) by using information about their specific needs or local area.
- 4. **Monitoring & Follow-Up**: Keeping track of individuals' progress and ensuring they receive the necessary support by collecting updates on their situation, such as changes in income, health, or housing status.
- 5. **Targeted Outreach**: Identifying individuals who may benefit from particular local services or outreach initiatives based on demographic or situational data.

This approach ensures that the advice is both relevant and actionable, ultimately helping individuals access the right services in their local community.

To find out more about how we use your information see the national Citizens Advice privacy policy.

## How we store your information

We use a secure cloud storage system provided by Google Workspace to store any emails you send us, and written documents about your case before they are uploaded to our national case management system, Casebook, which you can read about in <u>our national Citizens Advice privacy policy</u>.

- When you email us for advice, we keep this information for as long as we need to progress
  your case by transferring it to our national case management system, Casebook. The original
  email is stored for no longer than the statutory retention period of the type of data the
  information relates to,
- Physical files are stored in a secure filing cabinet for no longer than the statutory retention period for the type of data the information relates to.

### Our confidentiality policy

At Citizens Advice we have a confidentiality policy which states that anything you tell us as part of advice will not be shared outside of the Citizens Advice network unless you provide your permission for us to do so.

There are some exceptions to this such as needing to share:

- to prevent an immediate risk of harm to an individual
- In select circumstances if it is in the best interests of the client
- where we are compelled to do so by law (e.g. a court order or meeting statutory disclosures)
- where there is an overriding public interest such as to prevent harm against someone or to investigate a crime
- to defend against a complaint or legal claim
- to protect our name and reputation for example to provide our side of a story reported in the press

### Who we share your information with

We share your information when we refer you to partner organisations, but we only ever do this with your explicit consent. For example, if we think a partner organisation would be a better fit to handle your issue, we will ask you if you are happy for us to pass on your details to them.

We share data and case studies with our funders, so that they can see we are using the money that they have given us to help the people we have agreed to help. All statistical data shared with funders is anonymous, and all case studies are pseudonymised.

We share telephone numbers with 'text anywhere' for the purpose of communicating with you. See their website for details of how they process this data:

https://www.textanywhere.com/policy-documents/privacy-policy/

### Our lawful basis for using your information

Purpose	Personal data	Special category data
Advice, information and guidance provision:	Article 6(f) – Legitimate interests	Article 9(2)(f) – establishment, exercise or defence of legal claims
Publication of client stories:	Article 6(a) – Consent	Article 6(a) – Consent

EDI monitoring	Article 6(1)(f) – Legitimate interests	Article 9(2)(g) – substantial public interest
Statistical purposes and research (including feedback)	Article 6(1)(f) – Legitimate interests	Article 9(2)(j) Archiving, research and statistics
Complaints	Article 6(1)(f) – Legitimate interests	Article 9(2)(f) – establishment, exercise or defence of legal claims
		Article 9(2)(g) – substantial public interest
Legal claims	Article 6(1)(f) – Legitimate interests	Article 9(2)(f) – establishment, exercise or defence of legal claims
Individual rights requests	Article 6(1)(c) – Legal obligation	Article 9(2)(g) – substantial public interest
Safeguarding	Article 6(1)(e) – Public task	Article 9(2)(g) – substantial public interest
Fraud prevention	Article 6(1)(f) – Legitimate interests  Article 6(1)(c) – Legal obligation	Article 9(2)(g) – substantial public interest
Responding to an life threatening emergency	Article 6(1)(d) – Vital interests	Article 9(2)(g) – Vital interests

## How we use your data for research, feedback and statistics

This section covers how we use your data to carry out our research, feedback and statistical work.

National Citizens Advice covers their use of data for this purpose in their <u>privacy notice</u>.

#### How we collect your information

**Direct Collection**: This involves gathering information directly through feedback forms, complaint forms, applications, surveys, or during interactions such as meetings, emails, or phone calls.

When you use any of the forms on our website (for example, the "Email Advice Form" form. Data from these forms is stored in our secure cloud storage, provided by Google Workspace – see below under "How We Store Your Information".

**When you email us**, your emails are stored in our secure cloud storage, provided by Google Workspace – see below under "How We Store Your Information".

When you talk to an adviser about your case either in person or on the phone, any notes they make on your case will be stored in hard copy (for instance, in a notebook) or in secure electronic format temporarily, until the information is uploaded to our national case management system, Casebook.

When we see you face to face you may be asked to complete a Client Details form to obtain up to date information about your circumstances. This physical form along with any other physical paperwork will be stored in a secure filing cabinet for no longer than the statutory retention period for the type of data the information relates to.

#### What information we collect

We typically collect the following types of information:

- **Personal Identification**: Name, contact details (email, phone number, IP address), and address for communication purposes.
- **Demographic Information**: Age, gender, ethnicity, and other characteristics that may be relevant for tailoring the advice or identifying specific local programs.
- **Health or Social Care Information**: In some cases, more specific data related to health conditions, disabilities, or social care needs may be collected, especially when the advice involves welfare, benefits, or health-related services.
- **Local Context**: This includes information about the individual's local circumstances such as employment status, housing situation, or any area-specific issues (e.g., local housing programs, community services).
- **Financial Information**: In certain cases, especially for advice on benefits, housing, or financial assistance, financial details like income, debts, and expenses may be gathered to assess eligibility for local support.

### What we use your information for

This approach ensures that the advice is both relevant and actionable, ultimately helping individuals access the right services in their local community.

We may also use your information to provide evidence of issues within the local community that helps us to campaign for policy change.

### Who we share your information with

All statistical data and information shared with 3rd parties is anonymous, and all case studies are pseudonymised.

# How we use your data for fundraising and donations

This section covers how we use your data to carry out our fundraising activities.

National Citizens Advice covers their use of data for fundraising in their <u>privacy notice</u>.

#### How we collect your information

We use 'Give as you Live' (Online) to collect information about donations. See their website for details about how your personal data is processed: <a href="https://www.giveasyoulive.com/privacy">https://www.giveasyoulive.com/privacy</a>

## How we use your data when applying to work or volunteer

#### How we collect your information

Direct Collection: This involves gathering information directly from our application forms and/or via emails. We store the data in our secure cloud storage system provided by Google Workspace for no longer than the statutory retention period of the type of data the information relates to.

#### What information we collect

Personal information including EDI data

### What we use your information for

- To request references
- Onboarding into systems and platforms

#### Who we share your information with

Referees

### Our lawful basis for using your information

Legitimate Interest

# How we use your data when using our website

#### What information we collect

- **Personal Identification**: Name, contact details (email, phone number, IP address), and address for communication purposes.
- **Demographic Information**: Age, gender, ethnicity, and other characteristics that may be relevant for tailoring the advice or identifying specific local programs.
- **Health or Social Care Information**: In some cases, more specific data related to health conditions, disabilities, or social care needs may be collected, especially when the advice involves welfare, benefits, or health-related services.

#### How we collect your information

- The Email Advice Form. Data from these forms is stored in our secure cloud storage, provided by Google Workspace see below under "How We Store Your Information".
- The chatbot
- We ask for your consent to collect data using cookies, which are small lines of data which our website stores on your computer. We try to use as few cookies as possible, and on any page of our website, you can click the picture of a cookie in the bottom left to choose which cookies you want to use.

### What we use your information for

- Tailoring advice to an individual's unique circumstances, such as financial support, housing solutions, or health-related services, to ensure it is relevant and practical for their needs.
- Assessing what the advice needs are in the local community
- Assessing the effectiveness of the 'chat bot ' on the website

### Who we share your information with

Landbot: See their website for details of their privacy policy: <a href="https://landbot.io/privacy-policy">https://landbot.io/privacy-policy</a>

# How long we keep your data for

National Citizens Advice is responsible for managing any data in joint client case records. For more information please see their <u>privacy notice</u>.

Data	Purpose	Retention

Personal data: Physical records	To give advice/ investigate complaints	6 or 16 years
Personal data: Electronic records	To give advice/investigate complaints	6 or 16 years

## Your data protection rights

You have rights in relation to your personal data that we hold. Your rights include being able to request:

- Access to copies of your data
- Corrections are made to inaccurate data
- Deletion of your personal data
- Object to how we use your personal data

These rights are not absolute and may not apply in every circumstance. For more information about your rights you can visit the <u>ICO website</u>.

To make a data protection rights request you can do so by emailing admin@cawo.org.uk

### Raising a concern about how we use your information

If you are concerned about how we have handled your personal information please contact us at admin@cawo.org.uk.

You can also contact the national charity if you are unhappy with how we have used your personal data or wish to raise a concern about how a local office has handled your personal data. To do so you can email us at DPO@citizensadvice.org.uk

## **Contacting the Information Commissioner's Office (ICO)**

You can also raise your concern with the Information Commissioner's Office which regulates data protection law in the UK. if you are unhappy with how we have used your personal information. They will normally expect you to have made a complaint to us directly in the first instance.

- Visit the ICO website.
- Address: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF
- Helpline number: 0303 123 1113

### **About cookies**

A cookie is a file containing an identifier (a string of letters and numbers) that is sent by a web server to a web browser and is stored by the browser. The identifier is then sent back to the server each time the browser requests a page from the server.

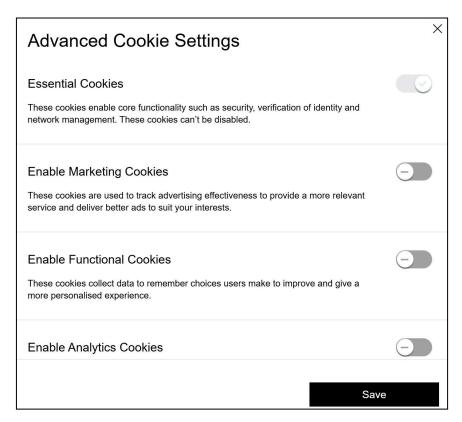
Cookies may be either "persistent" cookies or "session" cookies: a persistent cookie will be stored by a web browser and will remain valid until its set expiry date, unless deleted by the user before the expiry date; a session cookie, on the other hand, will expire at the end of the user session, when the web browser is closed.

Cookies do not typically contain any information that personally identifies a user, but personal information that CAOX stores about you may be linked to the information stored in and obtained from cookies.

### Cookies used by CAOX

When you first display the CAOX website, a cookie banner appears at the bottom with two buttons - 'Manage cookies' and 'Accept'.

If you click 'Manage cookies', this dialog box appears:



Essential cookies cannot be disabled. You can opt in to the other cookie types by clicking the buttons beside them.

If you click 'Accept' all the cookie types are selected. You can change the selection at any time by clicking the 'Manage cookies' link at the bottom left of the screen.

#### Cookies used by our service providers

Our service providers use cookies and those cookies may be stored on your computer when you visit our website.

CAOX uses Google Analytics to analyse the use of our website. Google Analytics gathers information about website use by means of cookies. This data may be stored outside the EU, under a EU-US Privacy Shield agreement. The information gathered relating to our website is used to create reports about the use of our website. Google's privacy policy is available at:

https://policies.google.com/technologies/cookies?hl=en-US

### Managing cookies

Most browsers allow you to refuse to accept cookies and to delete cookies. The methods for doing so vary from browser to browser, and from version to version. You can however obtain up-to-date information about blocking and deleting cookies via these links:

- <a href="https://support.google.com/chrome/answer/95647?hl=en">https://support.google.com/chrome/answer/95647?hl=en</a> (Chrome);
- <a href="https://support.mozilla.org/en-US/kb/enable-and-disable-cookies-website-preferences">https://support.mozilla.org/en-US/kb/enable-and-disable-cookies-website-preferences</a>

   (Firefox);
- <a href="https://help.opera.com/en/latest/web-preferences/#cookies">https://help.opera.com/en/latest/web-preferences/#cookies</a> (Opera);
- <a href="https://help.apple.com/safari/mac/8.0/en.lproj/sfri11471.html">https://help.apple.com/safari/mac/8.0/en.lproj/sfri11471.html</a> (Safari);
- <a href="https://privacy.microsoft.com/en-us/windows-10-microsoft-edge-and-privacy">https://privacy.microsoft.com/en-us/windows-10-microsoft-edge-and-privacy</a> (Edge).

Blocking all cookies will have a negative impact upon the usability of many websites.

If you block cookies, you will not be able to use all the features on our website.

#### **Our details**

This website is owned and operated by Citizens Advice Oxfordshire (CAOX).

CAOX is registered as a charity in England and Wales under registration number 04361560 and our registered office is at The Old Print House, Marlborough Lane, Witney, OX28 6DY.

Our principal place of business is at The Old Print House, Marlborough Lane, Witney, OX28 6DY.

#### You can contact us:

by post, using the postal address given above;

### Representative within the European Union

We have no need of representation in the EU.

#### **Data protection officer**

Our data protection officer's contact details are: Teresa Archer, The Old Print House, Marlborough Lane, Witney, OX28 6DY.

#### **Data protection registration**

CAOX is registered as a data controller with the UK Information Commissioner's Office.

Our data protection registration number is Z6952531.

### **Complaints**

If you have a complaint about us, or the treatment of your data, you can contact the Charity Commission. The Charity Commission is the independent watchdog for charities. You can make a complaint about a charity on their website at <a href="http://www.charity-commission.gov.uk">http://www.charity-commission.gov.uk</a>

If you've got a complaint about our fundraising activities you can also complain to the Fundraising Regulator. To find out how to go about making a complaint, go to the Fundraising Regulator website at <a href="https://www.fundraisingregulator.org.uk/make-a-complaint/complaints/">https://www.fundraisingregulator.org.uk/make-a-complaint/complaints/</a>