

Privacy Notices

Legally you must give the following information in a privacy notice to Grant Applicants

- Your identity and contact details (as data controller).
- Specify each category of data and the purpose and legal basis for you processing each category of data. This is why you collect each category of personal data in the first place and what you do with it as well as the legal gateway you are relying on. There could be more than one.
- If legitimate interest is the legal gateway relied on you must specify whether it is your own or those of a third party (or both) the legitimate interests which either you or a third party are pursuing.
- Who are recipients of the different categories of personal data when you share data with others - you should identify an actual named recipient wherever you can; otherwise you can specify the category into which they fall
- Details of any country outside the EU to which data can be transferred. This could well include a situation where you keep information when using emails or storage "in the cloud" that is stored in servers outside the EU. Our privacy notice assumes that you could hold data outside of the EU as most email servers such as Gmail, Hotmail, Yahoo, etc are outside.
- At present the EU has recognised Andorra, Argentina, Canada (for commercial organisations), Faroe Islands, Guernsey, Israel, Isle of Man, Jersey, New Zealand, Switzerland, Uruguay and the USA as states with adequate data protection. For servers hosted by companies in the United States you must ensure that they are listed as compliant with the [Privacy Standard Framework](#). If you cannot establish this then you should move your email account to a provider that meets the adequacy standard, such as [Google](#) or [Microsoft](#) or to a server hosted with the EU.
- How long you store data for - data must not be stored for excessive periods and you either need to state how long you will keep the data for or explain how this is to be calculated. For instance,).
- The rights of a data subject - we include these in our model notice.
- The right to lodge a complaint with the ICO - again this is included in our notice.
- Where there is a statutory or contractual obligation to provide information.

Distributing privacy notices

CS Disabled Holidays Ltd must:

- Give a privacy notice to all existing individuals who have received grants before 25th May 2018. If CS Disabled Holidays Ltd have missed this deadline (it will) it should give them one as quickly as possible. This can be done electronically or by post.
- Put CS Disabled Holidays Ltd privacy notice up on the website. If you use a website the privacy notice should be designed in two parts so it can be presented in two layers. The "Your Information" part should appear first with links through to the various sections.

It is important to be open and transparent about the information CS Disabled Holidays collect and holds.

How should CS Disabled Holidays give its Privacy Notices in the Future?

The privacy notice is a lengthy document.

The recommendation is to include the short form in the application form – this is belts and braces but is best practice – it may not need to be done in the long term but is what is being recommended currently.

The full privacy notice which is a very long document should be placed on the website with a prominently displayed link from the home page.

For current contacts – a simple message should be sent – electronic where possible – along the following lines:-

Dear ---

By law CS Disabled Holidays Ltd are required to give you a privacy notice to tell you what information we collect about you and what we do with it. This is a requirement of GDPR after 25th May 2018. You can access our privacy notice [insert as appropriate].

by going to our website at [give website address] and look for "privacy notice" by clicking onto this link [give link].

It is important that you read this privacy notice.

Make sure you get and keep proof that you have given the privacy notice.

CS Disabled Holidays Ltd

Privacy notice

Section 1 – Information

We care about your privacy. This Privacy Notice explains how we collect and use your personal data. Please read it carefully. If you have any questions about this Privacy Notice, or if you want to enforce your rights, please contact CS Disabled Holiday Ltd's Privacy Officer Joanna Lees at info@cdisabledholidays.co.uk

Please note that we can only respond to you once we have received your letter safely, and that our response may therefore be slower if you use post.

CS Disabled Holidays Ltd is a Charity based in England and Wales. Our Registered Address is **Hunters, 9 New Square, Lincoln's Inn, London WC2A 3QN**. Administration is conducted from **12 Cambria Street, London SW6 2EE** and Financial Matters are managed from **The Grange, Folly Hill, Itchen Stoke, Alresford, Hampshire, SO24 9TF**.

The controller of personal data collected through our Website and offline is CS Disabled Holidays Ltd at 12 Cambria Street, London SW6 2EE. "**Personal data**" in this Privacy Notice has the same meaning as in the EU General Data Protection Regulation 2016/679/EU (**GDPR**). Essentially, it means information which is connected to a living individual who can be identified from that information, either by itself or when combined with other data likely to come into our possession. Personal data can include information collected by certain cookies or tracking technologies if it builds up a profile of you.

We collect and use personal data in order to carry out a business which provides Charitable services. Any other activities and processing which we carry out is to support this primary aim. Our purposes and lawful grounds for processing your personal data vary, depending on our relationship with you and on the activity in question.

We will never sell your personal data.

We will only keep your personal data for as long as necessary to fulfil the purposes for which we collected and continue to process it, and to satisfy any legal, accounting or reporting requirements.

Section 2 - What Data we collect and how we use it

Visitors to our websites

When someone visits www.csdisabledholidays.co.uk we use a third party service, Google Analytics, to collect standard internet log information and details of visitor behaviour patterns. We do this to find out things such as the number of visitors to the various parts of the site. This information is only processed in a way which does not identify anyone. We do not make, and do not allow Google to make, any attempt to find out the identities of those visiting our website. If we do want to collect personally identifiable information through our website, we will be up front about this. We will make it clear when we collect personal information and will explain what we intend to do with it.

Use of cookies by the CS Disabled Holidays Ltd

You can read more about how we use cookies on our Cookies page.

Search engine

Our website search and decision notice search is powered by ???????. Search queries and results are logged anonymously to help us improve our website and search functionality. No user-specific data is collected by either CS Disabled Holidays Ltd or any third party

WordPress

We use a third party service, WordPress.com, to publish our blog, and some of our conference microsites. These sites are hosted at WordPress.com, which is run by Automattic Inc. We use a standard WordPress service to collect anonymous information about users' activity on the site, for example the number of users viewing pages on the site, to monitor and report on the effectiveness of the site and help us improve it. WordPress requires visitors that want to post a comment to enter a name and email address. For more information about how WordPress processes data, please see Automattic's privacy notice.

People who call our helpline

When you call the CS Disabled Holidays Ltd's helpline we collect Calling Line Identification (CLI) information. We use this information to help improve its efficiency and effectiveness.

People who email us

We monitor any emails sent to us, including file attachments, for viruses or malicious software. Please be aware that you have a responsibility to ensure that any email you send is within the bounds of the law.

People who make a complaint to us

When we receive a complaint from a person we make up a file containing the details of the complaint. This normally contains the identity of the complainant and any other individuals involved in the complaint.

We will only use the personal information we collect to process the complaint and to check on the level of service we provide. We do compile and publish statistics showing information like the number of complaints we receive, but not in a form which identifies anyone.

We usually have to disclose the complainant's identity to whoever the complaint is about. This is inevitable where, for example, the accuracy of a person's record is in dispute. If a complainant doesn't want information identifying him or her to be disclosed, we will try to respect that. However, it may not be possible to handle a complaint on an anonymous basis.

We will keep personal information contained in complaint files in line with our retention policy. This means that information relating to a complaint will be retained for two years from closure. It will be retained in a secure environment and access to it will be restricted according to the 'need to know' principle.

Similarly, where enquiries are submitted to us we will only use the information supplied to us to deal with the enquiry and any subsequent issues and to check on the level of service we provide.

Individuals applying for a grant under the CS Disabled Holidays Ltd Grants Programme

We process personal data about individuals who apply under CS Disabled Holidays Ltd grants programme, including individuals who apply on behalf of those individuals, their carers, the professionals who support those applications and individuals linked to the holidays that they are interested in undertaking.. This section includes information about both current and past clients.

What information do we ask for, and why?

We do not collect more information than we need to fulfil our stated purposes and will not retain it for longer than is necessary.

We may collect the following kinds of information about you where relevant.

The information we ask for is used to assess your suitability for a grant. You don't have to provide what we ask for but it might affect your application if you don't.

Grant Applicants

Types of data	Sources
Identity Data First name, last name, title, date of birth, gender	From you or your designated assistant
Contact Information Home addresses Home telephone and mobile numbers, email addresses How you would like to be contacted in the future	From you or your designated assistant
Payment information To who the Cheque should be made payable Your bank details	From you or your designated assistant
Main Cause of Disability	From you or your designated assistant
Other Contributing Conditions	From you or your designated assistant
Levels of Physical Disability Do you use a wheelchair - manual / power driven - Do you use a Hoist – Yes / No - Do you use any other Mobility Aids - Do you use a Ventilator -At night only/Day and Night / Only when ill / Other Please tick if you need help with any of the following - Eating /Dressing / Washing / Night checks or turning / bathing / toileting Do you need - PEG feeding / Bladder care / Bowel care / Stoma care / Tracheostomy care / Pressure area care / Other special needs - any other information you provide	From you or your designated assistant
Confirmation as to accuracy of details provided	From your designated Health Care professional
Holiday Details Date and duration of Holiday Accompanying Persons Contribute to care – not at all / partly / all of my care Plan to go to With – Venue / Organisation Address of the Venue Telephone of the Venue Email of the Venue	From you or your designated assistant

Web Address of the Organisation Total Holiday Cost Amount of the Grant that is being applied for from CS Disabled Holidays	
Declaration	Signature confirmation accuracy as to contents and confirming acceptance of T & Cs including Privacy notice

How do we use your personal data and on what lawful bases?

We do process 'special category' data as a matter of course and we are very careful to maintain your privacy. This is of utmost importance to us. All data that is moved between member of the Board is done so in an anonymised form. Forms are received by the Administrator as sent in by the Applicant. All emails are screened by an anti virus software, but individuals are reminded that it is their responsibility to ensure that email contents are lawful. They are filed on a manual filing system as the most secure and private system. Applications are then anonymised by the Administrator before being scanning and sent to the Grants committee for review. All Applications are allocated a numeric code by which members of the committee can discuss them.

Purpose	Type of Data	Lawful basis for processing	Who we share it with
To review an application for a Grant, To ensure an application is made as per our conditions To make payments for successful Applications	Identity Contract Payment Disability Contributing Factors Levels of Physical Disability Confirmation from Health Care Worker Holiday Details	Assessment of the Application (in Anonomised Form) Making of payments Legal and Regulatory Requirements Statistical Data (Anonomised form)	You UK Law and regulatory Bodies such as the Charities Commission

Opting Out

You can ask us to stop sending you messages at any time by contacting us at info@csdisabledholidays.co.uk.

All other contacts

Types of data	Sources
Identity Data First name, last name, title, date of birth, gender	From you or which ever third party provided the information (a record of the third party is kept.)
Contact Information Company where relevant Address Telephone and mobile numbers, email address(es) How you would like to be contacted in the future	From you or which ever third party provided the information (a record of the third party is kept.)
Financial Information If a donation has been made, how much and when	From you or which ever third party provided the information (a record of the third party is kept.)

How do we use your personal data and on what lawful bases?

We do process not process special category of data as a matter of course for this category of individuals. We are however very careful to to maintain your privacy. This is of utmost importance to us.

Purpose	Type of Data	Lawful basis for processing	Who we share it with
To make direct contact for transfer of information	Identity Contact	Dual interest provision Consent Legal and Regulatory Requirements Statistical Data (Anonomised form)	You UK Law and regulatory Bodies such as the Charities Commission

Opting Out

You can ask us to stop sending you messages at any time by contacting us at info@csdisabledholidays.co.uk.

DATA SECURITY

In order to prevent unauthorised access, distortion or disclosure of your personal data we have put in place appropriate physical, technical and organisational measures. Our service providers are required to do the same. Some of our security measures include:

We regularly review our procedures with regards to the IT standards that are in place including the use of passwords, where items are stored and how our IT is being managed.

Our finance department processes all other transaction types via an external cloud based provider which is compliant with all required security standards.

Administration is conducted on a MacBook which is protected by Bitdefender Antivirus for Mac which is run on a daily basis and kept up to date. Up dates are run on a daily basis to prevent security breaches.

We will make any legally-required disclosures of any breach of the security, confidentiality, or integrity of your electronically stored personal data to you either directly or by posting a clear notice on our Website without undue delay

Data Retention

We only keep your personal data for as long as necessary to fulfil the purposes for which we collected and continue to process it, and to satisfy any legal, accounting or reporting requirements.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

If you would like more information on our retention of the different aspects of your personal data please contact our Privacy Officer Joanna Lees at info@csdisabledholidays.co.uk

YOUR RIGHTS

If you are based in the EEA you have a number of rights under the GDPR. These rights apply to any processing carried out by CS Disabled Holidays Ltf. Please see more information below on what we will require from you before we can respond to such requests.

Right to object to direct marketing

You have the right to ask us not to process your personal data for marketing purposes, including profiling (eg. tracking your usage of our Website) to the extent that it is related to direct marketing. Within a reasonable time after receipt and consideration of your objection we will no longer process your personal data for direct marketing purposes. You can exercise your right to prevent such processing by ticking certain boxes on the forms we use to collect your personal data, or by contacting us at any time.

Access to Information

The GDPR gives you the right to find out whether we are processing your personal data and, where that is the case, to receive a copy of the personal data we process and information on:

- why we are processing it;
- the categories of personal data we process about you;
- the recipients or categories of recipient to whom the personal data has been or will be disclosed;
- where possible, how long we plan to keep your personal data or the criteria we use to determine that period;
- information on your rights under the GDPR;
- information on where we received your personal data from if we did not receive it directly from you, and
- if we transfer your personal data outside of the EEA, details of the appropriate safeguards we have used to protect your personal data and uphold your personal data protection rights.
- We will not charge you for complying with your request and providing you with a first copy. Any further copies may be subject to a reasonable administrative fee. Where your personal data is inseparable from the personal data of others, we reserve the right to redact or withhold it if it will infringe the rights of those third parties. We also reserve the right to withhold your personal data if permitted by relevant provisions in applicable local laws such as the UK's Data Protection Bill 2017-2019 (which will become the UK's Data Protection Act 2018 once made law).

The right to withdraw your consent to the processing of your personal data

If we process your personal data on the grounds of your consent, you have the right to withdraw your consent at any time. This will not affect the legality of our processing of your personal data up until the point at which you withdraw your consent. Please also note that we may still need to process your personal data on other grounds, for example to fulfil a contract with you or as required by law.

The right to object to processing of your personal data

You have the right to object to our processing of your personal data if we are using the lawful grounds 'legitimate interest' or that the processing is in the

public interest. When we receive your objection we will assess our legal grounds for processing and will stop processing the personal data if we cannot demonstrate compelling legitimate grounds to continue processing the personal data.

The right to request the restriction of your personal data

You have the right to ask us to restrict our processing of (ie. stop using) your personal data if you think that it is inaccurate, that we are processing it illegally, or that we no longer need it for the purposes for which it was collected. While we consider your request we will stop processing your personal data within a reasonable time from the date we receive your request. We will notify you of our decision and any justifications for continuing to process your personal data as soon as we can.

The right to request amendment or erasure of your personal data

You have the right to request the amendment of your personal data at any time if it is inaccurate. If it is incomplete, you have the right to have the information completed, taking into account the purposes of processing. You also have the right to require us to delete your personal data as soon as possible where one of the following applies:

- the personal data is no longer necessary for the purposes for which they were collected or otherwise processed;
- you withdraw your consent to us processing your personal data and we have no other legal grounds for processing it;
- the personal data has been unlawfully processed;
- the personal data must be erased for compliance with a UK or EU legal obligation on us;
- the personal data relates to a child under 16.

The right to personal data portability

You have the right to receive personal data which you have provided to us in a structured, commonly used and machine-readable format and have the right to transmit those personal data to another personal data controller, if we are processing it on the grounds that you have consented to that processing or because it was necessary in order to perform a contract with you, and if we have no other legal bases for processing it. This will not apply to most of our processing of your personal data, but we mention it for completeness.

The right to complain to the Supervisory Authority

If you feel that we have processed your personal data unfairly or unlawfully, you have the right to complain about us to the relevant Supervisory Authority, although please contact us first so that we can put things right.

In the UK the Supervisory Authority for personal data protection is the Information Commissioner's Office. You can contact the Information Commissioner's Office on +44 (0)303 123 1113.

How to exercise your rights

You can exercise your rights at any time by contacting our Privacy Officer, Joanna Lees, at info@cdisabledholidays.co.uk

Please include in your email:

- A clear statement on which rights you are seeking to enforce;
- A full description of the information or type of information that you are writing about; and
- Details which will confirm your identity, such as a scan of your passport or driving licence and a recent utility bill.

This is so that we can keep your personal data secure and respond to you as quickly as possible. If you are asking for a large range of personal data we may ask you to be more specific, so that we can manage your request as quickly and efficiently as possible.

No fee usually required

You will not usually have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

Time limit to respond

We aim to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

LINKS TO EXTERNAL FILES AND WEBSITES

Our Website sometimes contains links to external files and websites. The fact that we link to a file or website is not an endorsement, authorisation or representation of our affiliation with it. We do not exercise control over third party files or websites.

These other websites may place their own cookies or other files on your computer, collect data or solicit personally identifiable information from you. Other websites follow different rules regarding the use or disclosure of the personally identifiable information you submit to them. We encourage you to read the privacy policies or statements of the other websites you visit.

CHANGES TO THIS PRIVACY NOTICE

Any changes we may make to our Privacy Notice in the future will be posted on this page. This version of this Privacy notice is dated 17 September 2018.