Citizens Advice Camden

**Privacy Policy**

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### Introduction

At Citizens Advice Camden (CAC), 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 CAC. CAC 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 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 [privacy notice](https://www.citizensadvice.org.uk/wales/about-us/information/citizens-advice-privacy-policy/) available on their website that covers general advice and nationally managed systems, including our case management system (e.g. Casebook). 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 [privacy notice](https://www.citizensadvice.org.uk/wales/about-us/information/citizens-advice-privacy-policy/).

CAC uses your data in the same ways as described in the national Citizens Advice privacy notice. Please refer to that privacy notice [here](https://www.citizensadvice.org.uk/wales/about-us/information/when-you-get-advice-from-an-adviser/).

### How we collect your information

We collect information directly from you when you make contact with us. This may be when we speak to you on the phone, or at a face-to-face meeting, or via email or other electronic means. This data is held in the National Citizens Advice system called Casebook.

### What information we collect

We'll only ask for information that's relevant to your problem. Depending on what you want help with, this might include:

* your name and contact details - so we can keep in touch with you about your case
* personal information - for example about family, work, or financial circumstances, or if you're vulnerable or at risk of harm
* details about services you get that are causing you problems - like energy or post
* details of items or services you've bought and traders you've dealt with
* information like your gender, ethnicity or sexual orientation

We occasionally ask for details about someone else like a neighbour or your partner so we can deal with an enquiry. We'll only do this if we have a legitimate interest in the information, or we need it to protect someone's life.

If you don't want to give us certain information, you don't have to. For example, if you want to stay anonymous we'll only record information about your problem and make sure you're not identified.

We’ll always ask for your consent to store information about your:

* health conditions
* ethnic origin
* religion
* trade union membership
* sexual orientation

You can withdraw your consent at any time. [Contact your local Citizens Advice](https://citizensadvice.org.uk/about-us/contact-us/contact-us/contact-us/) and tell them what personal information you don't want us to store - we'll delete it.

We might ask your permission to contact you later with an online survey about your experience getting help from us. This is called the ‘Client Experience’ survey.

### ****What we use your information for****

The main reason we ask for your information is to help solve your problem. We only access your information for other reasons if we really need to. Data protection law lets us do this as long as we either get your consent or we have a legitimate interest. For example we have a legitimate interest to access your data:

* for training and quality purposes
* to investigate complaints
* to get feedback from you about our services
* to help us improve our services

All advisers and staff accessing data have had data protection training to make sure your information is handled sensitively and securely.

### ****Understanding people's problems****

We use some information to create statistics about who we're helping and what problems are the most common. We might use the information you’ve told us and your answers to the Client Experience survey. This information is always anonymised – you can't be identified.

We share these with funders, regulators, government departments and publicly on our blogs, reports, social media and press releases.

The statistics also inform our policy research, campaigns, or media work.

We might use a research company to help us analyse the information. We have an agreement with them to make sure they store data securely and follow data protection laws. We’re still responsible for keeping your personal information safe and making sure we follow data protection law. This means we're the ‘data controller' for your information.

### ****Our confidentiality policy****

At CAC 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 specific 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****

With your permission, we might share your information with other organisations so we can:

* help solve your problem - for example, if you ask us to contact your creditors we might need to share your name, address and financial details with them
* refer you quickly to another organisation for more advice or support, if relevant
* help you access certain services – for example, food banks or Trading Standards
* monitor the quality of our services

Organisations we share your data with must store and use your data in line with data protection law. They'll have their own privacy policies for how they handle your information and keep it safe.

There might be specific organisations we share your information with, depending on what service you access.

### ****If we're concerned about your or someone else's safety****

If something you've told us makes us think you or someone you know might be at serious risk of harm, we could tell the police or social services - for example if we think you might hurt yourself or someone else.

### ****If you need a food bank voucher****

We’ll ask your permission to share your information with the Trussell Trust - they run food banks across the country. You can [check the Trussell Trust’s privacy policy](https://www.trusselltrust.org/privacy/) on their website [here](https://www.trussell.org.uk/privacy).

### ****Our lawful basis for using your information****

We use various provisions as the lawful basis for processing your personal data when you dealing with you request for advice, as set out in the table below.

| **Personal data** (UK GDPR Article 6 requirement) | **Special category and criminal offence data** (UK GDPR Article 9 or 10 requirement) |
| --- | --- |
| **Article 6(1)(f) – Legitimate interests**  Where processing is not based on any public function. We have carried out a Legitimate Interests Assessment for this processing.  **Article 6(1)(e) – Public task**  Where processing is based on official authority laid down by law or a statutory function. For example in relation to our consumer service functions. | **Article 9(2)(f) – establishment, exercise or defence of legal claims**  Where the processing relates to the establishment or defence of legal claims including legal rights including but not limited to those such as those in relation to benefits, debt, energy and housing. For criminal offence data the same provision is outlined in Data Protection Act 2018, Schedule 1, Part 3 (33).  **Article 9(2)(g) – substantial public interest (statutory)**  Where our advice, information or guidance relates to a statutory function, such as in our consumer service we rely on Data Protection Act 2018, Schedule 1, (6) ‘Statutory etc and government purposes’. This condition also applies to criminal offence data  **Article 9(2)(g) - substantial public interest (confidential counselling, advice or support)**  Where our advice, information or guidance relates to confidential wellbeing support. For example if supporting a client with issues relating to loneliness. The specific substantial public interest condition we rely on is in Data Protection Act 2018, Schedule 1, (17) ‘Counselling etc’. This condition also applies to special category data and criminal offence data. |

## 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.

With your permission, we might ask you to fill in an online survey about your experience getting help from us – this is called the ‘Client Experience’ survey. This service is run by National Citizens Advice and they cover their use of data for this purpose in their [privacy notice](https://www.citizensadvice.org.uk/wales/about-us/information/citizens-advice-privacy-policy/).

At CAC, we also use anonymised data for research and campaigns purposes, feedback and statistical work. We do this to improve our services and also to try and bring about change for the wider community on issues identified during our advice work. For this work we never use information that would identify you unless you gave us permission to do so.

## 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 [privacy notice](https://www.citizensadvice.org.uk/wales/about-us/information/citizens-advice-privacy-policy/).

### ****How we collect your information****

For donations through our [CAC website](https://www.camdencabservice.org.uk/get-involved/donate/), we use the Charities Aid Foundation online platform CAF Donate. The [privacy policy here](https://www.cafonline.org/privacy#whyweprocess) on the CAF Donate website explains how they keep your data safe and how they use your data.

### ****What information we collect****

Your name, address and your bank details, but these are held by CAF and Citizens Advice Camden do not hold your bank details.

### ****What we use your information for****

CAF Donate collect this information so they can process your donation. Occasionally, we may contact you if you have asked us to keep you updated following your donation. However, we cannot access any of your bank details.

### ****Who we share your information with****

We do not share information regarding our donors. We would only do so if you gave us express permission. For example, you agreed to help us publicise a fundraising campaign.

### ****Our lawful basis for using your information****

**Article 6(1)(a) of the UK GDR – Consent.** We’re only collecting data from those people who have freely decided to donate and given us their data for that purpose.

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

### ****How we collect your information****

*Applying for paid jobs*

When you apply for a paid job with us, we collect your personal information through your application form, interview or references so we can process your application.  We have a ‘legitimate interest’ to do this under data protection law. This means it lets us carry out our aims and goals as an organisation. We need to use your personal information to recruit people and make sure our recruitment processes are inclusive.

We collect your details through a third party online recruitment system called  *Access People HR*. *Access* is the ‘data processor’ but Citizens Advice Camden is responsible for keeping your personal information safe and making sure we follow data protection law. This means we're the ‘data controller' for your personal information. You can read *Access*’ privacy notice on their website [here.](https://www.theaccessgroup.com/en-gb/privacy-notice-for-access-products/#three)

*Applying to be a volunteer*

When you apply to volunteer, you may apply direct to us through the CAC website, by emailing or contacting us in another way. Alternatively, you submit your details through the Citizens Advice website volunteering pages giving your details so we can contact you.

### ****What information we collect****

We collect personal information about you sufficient t

o deal with your application, this could include (but is not restricted to):

* Your full name
* Home address
* Phone number (home, mobile)
* Email address
* Gender
* Date of birth
* Ethnicity
* Disability/Medical conditions
* Languages spoken
* Employment status (and employer if relevant).

### ****What we use your information for****

We only use this information for the recruitment process. If someone is employed or is accepted as a volunteer, then we will hold personal data about you, and our use of this data is covered by a separate internal policy.

### ****Who we share your information with****

We may share your data for the purposes of undertaking DBS checks and to seek references for new recruits or volunteers.

### ****Our lawful basis for using your information****

Under UK GDPR, we rely on **Article 6(1)(f) – Legitimate interests** of the UK GDPR to process your personal data when you apply for a job or to volunteer. This means that CAC as employer has a legitimate interest in processing personal data to assess potential candidates for a job or volunteering, provided this processing is necessary and proportionate to achieve that goal. 

## How we use your data when using our website

### ****What information we collect****

The CAC website uses Google Analytics. This is a web analytics service offered by Google that tracks and reports website traffic. Google Analytics is now the most widely-used web analytics service on the internet. Google is a third party service and we recommend you read [Google’s privacy notice](https://support.google.com/analytics/answer/6004245?hl=en) to see how your personal information is used.

Nothing that can identify an individual user; we have no access to the IP address of the user.

### ****How we collect your information****

Google Analytics is third party software so CAC does not collect any personal information. Google, however, does collect information and then uses it to present CAC with statistics about how users interact with our website. There is no way for CAC to identify individual users as the information is not presented to us with any identifiable personal information.

Google Analytics is a data processor under GDPR because Google Analytics collects and processes data on behalf of our clients, pursuant to their instructions. CAC is the data controller, and we retain full rights over the collection, access, retention, and deletion of their data at any time.

The information CAC see about users includes:

* Country.
* Referring site.
* Time spent on page.
* Device type such as mobile or desktop.
* Browser.
* Operating system.

The information Google collects includes:

* Internet Protocol address – a unique number for each device on the internet.
* A unique ID number given to you by Google.
* Device ID.

CAC don’t have access to this information so we recommend you read Google’s privacy notice (link above) to see how they do with your personal information.

### ****What we use your information for****

We use the anonymised reports generated from your personal information to:

* Better understand how content is being used.
* Improve engagement.
* Understand trends.
* Improve the website.
* Provide quicker and easier access to online services.

### ****Who we share your information with****

As stated above, we share data with Google Analytics, for the purposes outlined above.

### ****Our lawful basis for using your information****

The legal basis for processing data collected with Google Analytics on the CAC website is your consent. The data that Google Analytics comes via Cookies on our website, and users are presented with a message asking if they agree to the use of Cookies. If you agree, then you have given your consent to the processing of your data for the purposes of Google Analytics.

### ****How we use cookies on our website****

Our policy explaining how we use cookies, including those for Google Analytics on the CAC website, is available [here](https://www.citizensadvice.org.uk/about-us/information/how-we-use-cookies/) (<https://www.citizensadvice.org.uk/about-us/information/how-we-use-cookies/>).

## 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 [privacy notice](https://www.citizensadvice.org.uk/wales/about-us/information/citizens-advice-privacy-policy/).

| **Data** | **Retention** |
| --- | --- |
| Data for advice | In accordance with National Citizens Advice data retention policy [here](https://docs.google.com/document/d/1wAlD_qcwx74RHoJxkuOiaCHEZfJ2_0Gfq4VMWtGPiCk/edit?tab=t.0). Six years, from last substantive action. We may keep information longer in some circumstances depending on the nature of the case. |
| Data for research, feedback and statistics | In accordance with National Citizens Advice data retention policy [here](https://docs.google.com/document/d/1wAlD_qcwx74RHoJxkuOiaCHEZfJ2_0Gfq4VMWtGPiCk/edit?tab=t.0). |
| Data for fundraising and donations | CAF Donate keep details of donations received for 18 months after received. |
| Data when applying for a job or to volunteer | One year. |
| Data when using our website | Google Analytics keeps personal information collected from CAC website for up to 14 months from the date of collection. |

## Third party processors

Third party processors are other organisations that carry out data processing on our behalf. Third party processors don’t use data for their own purposes and we have agreements in line with data protection law.

| **Processor name** | **Activities** |
| --- | --- |
| Google Analytics | If you agree to cookies when using our website, then Google produce statistics based on those who use the website. |
| National Citizens Casebook | See the national Citizens Advice [privacy notice](https://www.citizensadvice.org.uk/wales/about-us/information/citizens-advice-privacy-policy/). |

## 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 [ICO website](https://ico.org.uk/global/privacy-notice/your-data-protection-rights/).

To make a data protection rights request you can do so by emailing [administrator@camdencabservice.org.uk](mailto:administrator@camdencabservice.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 [administrator@camdencabservice.org.uk](mailto:administrator@camdencabservice.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](mailto: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.](https://ico.org.uk/make-a-complaint/data-protection-complaints/)
* Address: Information Commissioner’s Office, Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF
* Helpline number: 0303 123 1113