



# Privacy Notice

Spotlight is run by Poplar HARCA. This Privacy Notice explains how Spotlight and Poplar HARCA uses and protects your information. Poplar HARCA's privacy notice is available here: <https://www.poplarharca.co.uk/privacy-notice>

## **What personal information do we collect**

Poplar HARCA is registered with the Information Commissioners Office.

We collect personal and sensitive information to deliver services.

When we ask you for information, we will tell you how we will use it.

If you agree, we will use your information to tell you about services, products, events, news or other information. If you do not agree, we will not send you this type of information.

## **How do we use your personal information?**

We will collect, use and store information only when allowed for by the GDPR through:

- Consent
- Contract
- Legal Obligation
- Legitimate Interest
- Public Tasks
- Vital Interests

Examples of how information will be used include:

- get feedback
- in response to requests allowed for by the GDPR e.g. Local Authority or Government agency
- investigate complaints
- provide advice or support
- provide education, employment and training advice
- provide services
- to communicate about services offered by Spotlight

Information will be shared with others only if:

- another organisation is providing services as Poplar HARCA's agent or contractor
- the law says we have to e.g. safeguarding; or detection and prevention of crime
- you have given permission

### **Websites**

Our websites use Google Analytics to collect information about visitors. This information is processed in a way that does not allow us to identify anyone.

### **Website forms**

When you fill-in an online form, we may collect personal information so we can deal with the enquiry.

### **Website Links**

Clicking on a link to a different website means you leave our website. Each separate website should have a Privacy Notice.

### **Telephoning us**

When you phone Poplar HARCA we collect Calling Line Identification information, and the time and duration of the call. We also record some calls. We use this information to help improve performance.

Translation services are provided by a third party which does not retain information from, nor record, calls.

### **Emailing us**

Symantec Message Labs monitors and scans emails and attachments sent to us. The email sender is responsible to ensure email and attachment contents comply with the law.

### **Complaints and enquiries**

We will ask for information so we can investigate and respond to complaints and enquiries.

The information collected will be used to investigate and respond to complaints and enquiries. It may be shared securely with:

- officers investigating the complaint
- officers responding to the complaint or enquiry
- panel members (including a resident, or a Board or Committee member)
- third parties (if we need information from one of our data processors)

Information related to a complaint will be retained securely for 7 years once the complaint has been closed.

We will assume your consent to share information with an elected Councillor or MP when they make an enquiry on your behalf.

### **Using services**

To provide services, or assess eligibility for a service, Poplar HARCA has to have information about you.

We will use (and sometimes share) information to provide services, or to assess your eligibility for a service e.g. providing a referral to a partner to provide specialist services for your wellbeing, for example the NSPCC.

If you agree, we will use your information to send you a survey about our services. If you do not agree, we will not send you a survey.

## **CCTV**

CCTV systems are used in our buildings and on our estates. They are not usually monitored in real-time, but may be if an on-going incident is reported.

Footage is recorded over after 30 days. Downloads are restricted, but will be shared with the Police or other agencies for the purpose of preventing and detecting crime. Downloaded images are securely stored and access is restricted.

## **Freedom of information**

Poplar HARCA is not a prescribed organisation for the purposes of the Freedom of Information Act. We do not share information requested under the Act's provisions.

## **Your rights**

- Right to be informed
- Right to data portability
- Right to erasure
- Right to object
- Right to rectification
- Right to restrict processing
- Rights related to automated decision making including profiling

You can access information we hold about you by making a 'subject access request'. The request must be in writing, and will be processed after confirming your identity.

We will give you a copy of the information you request, explain why we have the information and who it may be shared with. If there is any information we are not able to give you we will explain why.

## **Contact us**

This privacy notice does not detail all of the types or uses of information. If you have a specific question not covered in this notice, contact us:

- 0800 035 1991
- [dataprotection@poplarharca.co.uk](mailto:dataprotection@poplarharca.co.uk)
- Nazmul Ahmed, Data Protection Officer, Poplar HARCA, 167A East India Dock Road, London E14 0EA