SWAN: Keeping Communities Connected

SWAN Advice Network customer privacy notice

This privacy notice tells you what to expect us to do with your personal information.

- Contact details
- What information we collect, use, and why
- Lawful bases and data protection rights
- Where we get personal information from
- How long we keep information
- Who we share information with
- How to complain

Contact details

Post
SWAN Advice Network, Unit B, 1 Waterloo Road, Radstock, BANES, BA3 3EP, GB
Telephone
01761 439548
Email
office@swan-transport.co.uk

What information we collect, use, and why

We collect or use the following information to **provide services and goods, including delivery and third party referrals**:

- Names and contact details
- Gender
- Pronoun preferences
- Addresses
- Date of birth
- Emergency contact details
- Next of kin details
- Photographs or video recordings
- Service use history
- Health information (including medical conditions, test results, allergies, medical requirements and medical history)
- Dietary information (including allergies and health conditions)
- Information about care needs (including disabilities, home conditions, dietary requirements and general care provisions)
- Information about work, home and living conditions
- Information about support requirements
- Information about lifestyle, interests or personal history
- Criminal offence data

- Records of meetings and decisions
- Information about income and financial needs for funding or personal budget support
- Payment details (including card or bank information for transfers and direct debits)
- Website user information (including user journeys and cookie tracking)
- Information relating to compliments or complaints

We also collect or use the following special category information to **provide services and goods, including delivery and third party referrals.** This information is subject to additional protection due to its sensitive nature:

- Health information

We collect or use the following information to **receive donations or funding and organise fundraising activities**:

- Names and contact details
- Addresses
- Payment or banking details
- Donation history
- Health information
- Tax payer information (for Gift Aid purposes)
- Visitors to our stores and website

We also collect or use the following special category information to **receive donations or funding and organise fundraising activities.** This information is subject to additional protection due to its sensitive nature:

- Health information

We collect or use the following personal information for **service updates or marketing purposes**:

- Names and contact details
- Addresses
- Marketing preferences
- Recorded images, such as photos or videos
- Website and app user journey information
- Records of consent, where appropriate

We also collect or use the following special category information **for service updates or marketing purposes.** This information is subject to additional protection due to its sensitive nature:

- Health information

We collect or use the following personal information to **comply with legal requirements**:

- Name
- Contact information
- Identification documents
- Financial transaction information
- Any other personal information required to comply with legal obligations

- Health and safety information
- Safeguarding information
- Criminal offence data

We also collect or use the following special category information to **comply with legal requirements.** This information is subject to additional protection due to its sensitive nature:

- Health information

We collect or use the following personal information for **recruitment purposes**:

- Contact details (eg name, address, telephone number or personal email address)
- Date of birth
- National Insurance number
- Copies of passports or other photo ID
- Employment history (eg job application, employment references or secondary employment)
- Education history (eg qualifications)
- Right to work information
- Details of any criminal convictions (eg Disclosure Barring Service (DBS), Access NI or Disclosure Scotland checks)
- Security clearance details (eg basic checks and higher security clearance)

We also collect or use the following special category information for **recruitment purposes.** This information is subject to additional protection due to its sensitive nature:

- Racial or ethnic origin
- Health information

We collect or use the following personal information for **dealing with queries, complaints or claims**:

- Names and contact details
- Address
- Payment details
- Account information
- Purchase or service history
- Video recordings of public areas
- Audio recordings of public areas
- Video recordings of private or staff only areas
- Audio recordings of private or staff only areas
- Dashcam footage - outside vehicle
- Dashcam footage - inside vehicle
- Witness statements and contact details
- Relevant information from previous investigations
- Customer or client accounts and records
- Financial transaction information

- Information relating to health and safety (including incident investigation details and reports and accident book records)
- Correspondence

We also collect or use the following special category information for **dealing with queries, complaints or claims.** This information is subject to additional protection due to its sensitive nature:

- Health information

Lawful bases and data protection rights

Under UK data protection law, we must have a "lawful basis" for collecting and using your personal information. There is a list of possible lawful bases in the UK GDPR. You can find out more about lawful bases on the ICO's website.

Which lawful basis we rely on may affect your data protection rights which are set out in brief below. You can find out more about your data protection rights and the exemptions which may apply on the ICO's website:

- **Your right of access** - You have the right to ask us for copies of your personal information. You can request other information such as details about where we get personal information from and who we share personal information with. There are some exemptions which means you may not receive all the information you ask for. Read more about the right of access.
- **Your right to rectification** - You have the right to ask us to correct or delete personal information you think is inaccurate or incomplete. Read more about the right to rectification.
- **Your right to erasure** - You have the right to ask us to delete your personal information. Read more about the right to erasure.
- **Your right to restriction of processing** - You have the right to ask us to limit how we can use your personal information. Read more about the right to restriction of processing.
- **Your right to object to processing** - You have the right to object to the processing of your personal data. Read more about the right to object to processing.
- **Your right to data portability** - You have the right to ask that we transfer the personal information you gave us to another organisation, or to you. Read more about the right to data portability.
- **Your right to withdraw consent** – When we use consent as our lawful basis you have the right to withdraw your consent at any time. Read more about the right to withdraw consent.

If you make a request, we must respond to you without undue delay and in any event within one month.

To make a data protection rights request, please contact us using the contact details at the top of this privacy notice.

Our lawful bases for the collection and use of your data

Our lawful bases for collecting or using personal information to **provide services and goods, including delivery and third party referrals** are:

- Consent - we have permission from you after we gave you all the relevant information. All of your data protection rights may apply, except the right to object. To be clear, you do have the right to withdraw your consent at any time.
- Contract – we have to collect or use the information so we can enter into or carry out a contract with you. All of your data protection rights may apply except the right to object.
- Legal obligation – we have to collect or use your information so we can comply with the law. All of your data protection rights may apply, except the right to erasure, the right to object and the right to data portability.
- Legitimate interests – we're collecting or using your information because it benefits you, our organisation or someone else, without causing an undue risk of harm to anyone. All of your data protection rights may apply, except the right to portability. Our legitimate interests are:
    - SWAN Transport has a legitimate interest in collecting, using and retaining personal information where it is necessary to provide safe, effective and accessible community transport services and related community support. As a registered charity supporting older people, disabled people, vulnerable adults and other members of the community who may face barriers to accessing essential services, processing personal information is fundamental to fulfilling our charitable objectives and delivering the services individuals have requested. We collect personal information to register passengers and service users, arrange and manage transport bookings, communicate about journeys, assess eligibility for services, respond to enquiries, maintain accurate records, ensure the safety of passengers, volunteers and staff, and administer our transport operations efficiently. We also collect information that enables us to understand and meet individual needs, such as mobility requirements, accessibility needs, communication preferences and emergency contact details. Where appropriate and relevant, we may also process limited health information where this is necessary to ensure journeys can be provided safely. In some circumstances, we process personal information to make or receive referrals to or from trusted partner organisations, including local authorities, NHS services, social care providers, community organisations and other

voluntary sector agencies. This enables individuals to access the most appropriate support, prevents unnecessary duplication of information, improves coordination between services and helps ensure that people receive timely assistance. Information is only shared where there is a lawful basis to do so and only the minimum information necessary for the intended purpose is disclosed. The processing of this information is necessary because we would be unable to provide our services safely or effectively without it. For example, we require accurate contact details to confirm bookings or notify passengers of changes; addresses to arrange collections and destinations; mobility information to allocate suitable vehicles or volunteers; emergency contact information should an incident occur; and referral information to ensure that people receive appropriate support. Without processing this information, we would be unable to meet our duty of care, fulfil service requests or operate our services safely and efficiently. Processing personal information under legitimate interests provides significant benefits to service users, volunteers, partner organisations and the wider community. These benefits include improving access to healthcare, shopping, social activities and other essential services; reducing loneliness and social isolation; supporting independence; improving community wellbeing; ensuring vulnerable individuals receive appropriate support; enabling effective partnership working; and making the best use of charitable resources so that more people can benefit from our services. Before relying on legitimate interests, SWAN Transport carefully considers the potential impact on individuals\' privacy and rights. We believe our interests are balanced with those of the individuals concerned because the processing is proportionate, expected and directly related to the services they have requested or are receiving. We only collect information that is relevant, adequate and limited to what is necessary for the specific purpose. Personal information is accessed only by authorised staff and volunteers who require it to carry out their roles and who are trained in confidentiality, safeguarding and data protection. Appropriate technical and organisational measures are in place to protect personal information against unauthorised access, accidental loss, misuse or disclosure. Information is retained only for as long as necessary in accordance with our retention policies and legal obligations.

For more information on our use of legitimate interests as a lawful basis you can contact us using the contact details set out above.

- Recognised legitimate interests - our pre-approved purpose for collecting or using personal information to provide services and goods, including delivery and third party referrals:

  We need to share personal information with a public authority or another organisation because they need it for their public tasks or official functions (the ‘public task disclosure response condition’)., We need to safeguard national security, protect public security, or

for defence reasons (the ‘national security, public security and defence condition’)., We need to respond to, or deal with, an emergency event or situation (the ‘emergencies condition’)., We need to prevent, detect, or investigate a crime, including the apprehension and prosecution of offenders (the ‘crime condition’)., We need to protect the physical, mental or emotional well-being of people who need extra support, or to protect them from harm or neglect (the ‘safeguarding condition’).

- Vital interests – collecting or using the information is needed when someone’s physical or mental health or wellbeing is at urgent or serious risk. This includes an urgent need for life sustaining food, water, clothing or shelter. All of your data protection rights may apply, except the right to object and the right to portability.
- Public task – we have to collect or use your information to carry out a task laid down in law, which the law intends to be performed by an organisation such as ours. All of your data protection rights may apply, except the right to erasure and the right to portability.

Our lawful bases for collecting or using personal information to **receive donations or funding and organise fundraising activities** are:

- Consent - we have permission from you after we gave you all the relevant information. All of your data protection rights may apply, except the right to object. To be clear, you do have the right to withdraw your consent at any time.
- Contract – we have to collect or use the information so we can enter into or carry out a contract with you. All of your data protection rights may apply except the right to object.
- Legal obligation – we have to collect or use your information so we can comply with the law. All of your data protection rights may apply, except the right to erasure, the right to object and the right to data portability.
- Legitimate interests – we’re collecting or using your information because it benefits you, our organisation or someone else, without causing an undue risk of harm to anyone. All of your data protection rights may apply, except the right to portability. Our legitimate interests are:
    - SWAN Transport has a legitimate interest in collecting, using and retaining personal information where it is necessary to receive donations, secure funding and organise fundraising activities that support our charitable objectives. As a registered charity, fundraising and grant funding are essential to sustaining and developing our community transport and other charitable services. Processing personal information enables us to build and maintain relationships with donors, supporters, funders, volunteers and community partners, ensuring we can continue to provide services that benefit local people. We collect and process personal information from individuals and organisations who choose to support SWAN Transport financially or participate in our fundraising activities. This may include names, contact details, donation history, Gift Aid declarations, payment information (where applicable), event registrations, communication preferences and correspondence relating to donations or fundraising. We may also process

information required by funding bodies when applying for grants, reporting on funded projects or demonstrating the impact of our services. This processing is necessary to administer donations, claim Gift Aid from HM Revenue & Customs, issue receipts and acknowledgements, keep accurate financial records, comply with charity and financial regulations, communicate with donors about the use and impact of their support, organise fundraising events and campaigns, and meet the reporting requirements of grant funders. Without processing this information, we would be unable to manage donations effectively, demonstrate accountability, fulfil our legal obligations or secure the funding needed to continue delivering our charitable services. The processing of personal information provides significant benefits to donors, supporters, beneficiaries and the wider community. It enables SWAN Transport to generate the income required to provide accessible community transport and other charitable activities, improve services, invest in vehicles and equipment, recruit and support volunteers, and respond to changing community needs. It also allows us to recognise and thank supporters appropriately, ensure donations are managed accurately and transparently, and demonstrate to funders that their financial support is being used responsibly and effectively. Before relying on legitimate interests, SWAN Transport carefully considers the impact on individuals\' rights and freedoms. We believe this processing is reasonable and expected, as individuals voluntarily choose to donate, participate in fundraising activities or engage with us as supporters. We only collect personal information that is relevant and necessary for the specific purpose, and we do not use it in ways that people would not reasonably expect. Individuals can choose how they hear from us, can update their communication preferences at any time and may opt out of receiving fundraising communications where applicable. Where personal information is shared with third parties, this is limited to trusted organisations where it is necessary to administer donations, process payments, claim Gift Aid, manage fundraising platforms or comply with legal or regulatory requirements. We do not sell or trade personal information for marketing purposes. Appropriate technical and organisational measures are in place to protect personal information from unauthorised access, loss, misuse or disclosure. Access is restricted to authorised staff and volunteers who require the information for their role and who are trained in confidentiality and data protection. Personal information is retained only for as long as necessary to meet legal, regulatory and operational requirements.

For more information on our use of legitimate interests as a lawful basis you can contact us using the contact details set out above.

- Recognised legitimate interests - our pre-approved purpose for collecting or using personal information to receive donations or funding and organise fundraising activities:

We need to share personal information with a public authority or another organisation because they need it for their public tasks or official functions (the 'public task disclosure response condition')., We need to safeguard national security, protect public security, or for defence reasons (the 'national security, public security and defence condition')., We need to respond to, or deal with, an emergency event or situation (the 'emergencies condition')., We need to prevent, detect, or investigate a crime, including the apprehension and prosecution of offenders (the 'crime condition')., We need to protect the physical, mental or emotional well-being of people who need extra support, or to protect them from harm or neglect (the 'safeguarding condition').

- Vital interests – collecting or using the information is needed when someone's physical or mental health or wellbeing is at urgent or serious risk. This includes an urgent need for life sustaining food, water, clothing or shelter. All of your data protection rights may apply, except the right to object and the right to portability.
- Public task – we have to collect or use your information to carry out a task laid down in law, which the law intends to be performed by an organisation such as ours. All of your data protection rights may apply, except the right to erasure and the right to portability.

Our lawful bases for collecting or using personal information for **service updates or marketing purposes** are:

- Consent - we have permission from you after we gave you all the relevant information. All of your data protection rights may apply, except the right to object. To be clear, you do have the right to withdraw your consent at any time.
- Contract – we have to collect or use the information so we can enter into or carry out a contract with you. All of your data protection rights may apply except the right to object.
- Legal obligation – we have to collect or use your information so we can comply with the law. All of your data protection rights may apply, except the right to erasure, the right to object and the right to data portability.
- Legitimate interests – we're collecting or using your information because it benefits you, our organisation or someone else, without causing an undue risk of harm to anyone. All of your data protection rights may apply, except the right to portability. Our legitimate interests are:
    - SWAN Transport has a legitimate interest in collecting, using and retaining personal information to communicate with passengers, volunteers, supporters, donors, partner organisations and members of the public about our services, activities and charitable work. Effective communication is essential to ensuring that people are aware of the services available, receive important operational updates and have opportunities to support or engage with our charity. We process personal information such as names, contact details, communication preferences and records of previous engagement with SWAN Transport to send service updates, newsletters, information about new or changed services, volunteering opportunities, fundraising campaigns, community events, training opportunities,

public awareness campaigns and other communications that are relevant to the individual\'s relationship with the charity. This processing is necessary because it enables us to keep service users informed about changes that may affect them, including service availability, timetable changes, temporary disruptions, safety information and new initiatives. It also allows us to promote our charitable services to those who may benefit from them, recruit volunteers, encourage community support, raise awareness of local issues affecting transport and social isolation, and generate the funding and volunteer capacity needed to continue delivering our charitable objectives. The benefits of this processing extend to both individuals and the wider community. Service users receive timely information that helps them access transport and support services. Volunteers and supporters remain informed about opportunities to contribute, while the wider public becomes more aware of the challenges faced by vulnerable and isolated people in the community. Effective marketing also helps SWAN Transport reach people who may not otherwise know that support is available, increasing access to essential services and strengthening community engagement. We carefully balance these legitimate interests against the rights and freedoms of the individuals whose information we process. We believe the processing is reasonable and proportionate because communications are relevant to an individual\'s existing relationship with SWAN Transport or to services they have shown an interest in. We only collect the minimum personal information necessary, limit communications to those that are appropriate and relevant, and avoid excessive or intrusive marketing. Where electronic marketing requires consent under the Privacy and Electronic Communications Regulations (PECR), such as promotional emails or text messages to individuals who are not covered by an applicable exemption, we will obtain and rely on that consent rather than legitimate interests. Individuals can choose their communication preferences, unsubscribe from marketing communications at any time, or object to processing based on legitimate interests where applicable. Opt-out requests are respected promptly. We do not sell personal information or share it with third parties for their own marketing purposes. Where we use trusted third-party providers to distribute newsletters, manage mailing lists or support communications, they only process personal information on our behalf under appropriate contractual and security arrangements. Appropriate technical and organisational measures are in place to protect personal information from unauthorised access, loss or misuse. Access is restricted to authorised staff and volunteers who require the information for their role, and personal information is retained only for as long as necessary in accordance with our retention policies. Having carefully considered the potential impact on individuals, SWAN Transport is satisfied that this processing is necessary, proportionate and justified.

For more information on our use of legitimate interests as a lawful basis you can contact us using the contact details set out above.

- Recognised legitimate interests - our pre-approved purpose for collecting or using personal information for service updates or marketing purposes:

  We need to share personal information with a public authority or another organisation because they need it for their public tasks or official functions (the 'public task disclosure response condition')., We need to safeguard national security, protect public security, or for defence reasons (the 'national security, public security and defence condition')., We need to respond to, or deal with, an emergency event or situation (the 'emergencies condition')., We need to prevent, detect, or investigate a crime, including the apprehension and prosecution of offenders (the 'crime condition')., We need to protect the physical, mental or emotional well-being of people who need extra support, or to protect them from harm or neglect (the 'safeguarding condition').
- Vital interests – collecting or using the information is needed when someone's physical or mental health or wellbeing is at urgent or serious risk. This includes an urgent need for life sustaining food, water, clothing or shelter. All of your data protection rights may apply, except the right to object and the right to portability.
- Public task – we have to collect or use your information to carry out a task laid down in law, which the law intends to be performed by an organisation such as ours. All of your data protection rights may apply, except the right to erasure and the right to portability.

Our lawful bases for collecting or using personal information to **comply with legal requirements** are:

- Consent - we have permission from you after we gave you all the relevant information. All of your data protection rights may apply, except the right to object. To be clear, you do have the right to withdraw your consent at any time.
- Contract – we have to collect or use the information so we can enter into or carry out a contract with you. All of your data protection rights may apply except the right to object.
- Legal obligation – we have to collect or use your information so we can comply with the law. All of your data protection rights may apply, except the right to erasure, the right to object and the right to data portability.
- Legitimate interests – we're collecting or using your information because it benefits you, our organisation or someone else, without causing an undue risk of harm to anyone. All of your data protection rights may apply, except the right to portability. Our legitimate interests are:
    - SWAN Transport has a legitimate interest in collecting, using and retaining personal information where it is necessary to comply with legal, regulatory and governance requirements associated with operating as a registered charity and community transport provider. Processing personal information enables us to meet our legal obligations, demonstrate accountability, protect the safety of individuals and maintain public trust in our organisation. We process personal information to

comply with requirements arising under charity law, company law, employment law, health and safety legislation, safeguarding legislation, equality legislation, insurance requirements, financial and accounting regulations, tax legislation and other applicable legal or regulatory frameworks. This may include maintaining accurate records, responding to requests from regulatory bodies or statutory agencies, investigating incidents or complaints, reporting safeguarding concerns, preventing fraud, meeting audit requirements and supporting legal claims or proceedings where necessary. The personal information processed may include names, contact details, dates of birth where required, financial records, volunteer and employee records, journey records, incident reports, safeguarding information, training records, DBS status where applicable, and correspondence relating to legal or regulatory matters. We only collect and use the information that is necessary for the relevant legal purpose. This processing is necessary because SWAN Transport would be unable to operate lawfully or fulfil its responsibilities without maintaining appropriate records and responding to legal obligations. For example, we may be required to retain financial records for statutory periods, report safeguarding concerns to the appropriate authorities, cooperate with police or regulatory investigations where legally required, maintain health and safety records, or provide information to insurers in the event of an incident or claim. Processing personal information in this way benefits service users, volunteers, employees, donors, funders and the wider community by helping to ensure that SWAN Transport operates safely, transparently and responsibly. It enables us to protect vulnerable people, demonstrate accountability for public and charitable funds, prevent fraud and misuse of resources, investigate concerns fairly, maintain appropriate insurance cover and comply with the standards expected of a registered charity and community transport provider. Before relying on legitimate interests, SWAN Transport carefully considers the impact on individuals\' rights and freedoms. We only collect personal information that is relevant and proportionate to the legal or regulatory purpose, restrict access to authorised staff and volunteers who need the information to carry out their duties, and ensure that all information is handled confidentially and securely. Where a specific legal obligation under UK GDPR or other legislation provides the appropriate lawful basis for processing, we rely on that lawful basis rather than legitimate interests. Personal information is retained only for as long as necessary to meet legal, regulatory and operational requirements and is securely disposed of when no longer required. Appropriate technical and organisational measures are in place to protect information against unauthorised access, loss, alteration or disclosure. Having carefully balanced our legitimate interests with the rights and freedoms of individuals, SWAN Transport considers that this processing is necessary, proportionate and justified.

For more information on our use of legitimate interests as a lawful basis you can contact us using the contact details set out above.

- Recognised legitimate interests - our pre-approved purpose for collecting or using personal information to comply with legal requirements:

  We need to share personal information with a public authority or another organisation because they need it for their public tasks or official functions (the 'public task disclosure response condition')., We need to safeguard national security, protect public security, or for defence reasons (the 'national security, public security and defence condition')., We need to prevent, detect, or investigate a crime, including the apprehension and prosecution of offenders (the 'crime condition')., We need to protect the physical, mental or emotional well-being of people who need extra support, or to protect them from harm or neglect (the 'safeguarding condition').
- Vital interests – collecting or using the information is needed when someone's physical or mental health or wellbeing is at urgent or serious risk. This includes an urgent need for life sustaining food, water, clothing or shelter. All of your data protection rights may apply, except the right to object and the right to portability.
- Public task – we have to collect or use your information to carry out a task laid down in law, which the law intends to be performed by an organisation such as ours. All of your data protection rights may apply, except the right to erasure and the right to portability.

Our lawful bases for collecting or using personal information for **recruitment purposes** are:

- Consent - we have permission from you after we gave you all the relevant information. All of your data protection rights may apply, except the right to object. To be clear, you do have the right to withdraw your consent at any time.
- Contract – we have to collect or use the information so we can enter into or carry out a contract with you. All of your data protection rights may apply except the right to object.
- Legal obligation – we have to collect or use your information so we can comply with the law. All of your data protection rights may apply, except the right to erasure, the right to object and the right to data portability.
- Legitimate interests – we're collecting or using your information because it benefits you, our organisation or someone else, without causing an undue risk of harm to anyone. All of your data protection rights may apply, except the right to portability. Our legitimate interests are:
    - SWAN Transport has a legitimate interest in collecting, using and retaining personal information to recruit employees, volunteers and trustees who are suitable to support the delivery and governance of our charitable services. As a community transport charity working with older people, disabled people and other vulnerable members of the community, it is essential that we recruit individuals with the appropriate skills, experience, integrity and commitment to carry out their roles safely and effectively. We process personal information throughout the recruitment process to assess applications, communicate with candidates, arrange

interviews, verify qualifications and experience, obtain references, assess suitability for specific roles and make informed recruitment decisions. For certain roles, particularly those involving contact with vulnerable adults or children, we may also process information relating to criminal record checks (DBS), driving licences, insurance requirements, medical fitness where appropriate, right to work checks and other information required to meet safeguarding, legal or regulatory obligations. The personal information we process may include names, contact details, employment history, qualifications, training records, references, application forms, CVs, interview notes, driving licence details, DBS status where applicable, and correspondence relating to the recruitment process. We only collect information that is relevant and necessary for the role being applied for. This processing is necessary because we would be unable to recruit suitable staff, volunteers or trustees safely or fairly without it. We need to assess whether applicants have the skills and experience required for the role, ensure they can carry out their duties safely, verify their identity where appropriate, and fulfil our safeguarding responsibilities. For volunteer drivers and other transport-related roles, processing information such as driving licence details and insurance information helps ensure that journeys can be delivered safely and in accordance with legal and organisational requirements. Processing this information benefits applicants, SWAN Transport, service users and the wider community. It enables us to operate a fair, transparent and consistent recruitment process, appoint suitable individuals, protect vulnerable people, maintain high standards of service and governance, and ensure compliance with safeguarding and employment requirements. Careful recruitment also helps build a skilled and reliable workforce and volunteer team, ensuring the continued delivery of safe and effective community transport services. Before relying on legitimate interests, SWAN Transport carefully considers the impact on applicants\' rights and freedoms. We only request information that is proportionate to the role, explain why it is needed, and treat all applications confidentially. Recruitment decisions are based on relevant criteria, and personal information is only accessed by authorised staff, managers or trustees involved in the recruitment process. Where special category or criminal offence data is processed, we do so only where permitted by law and under the appropriate UK GDPR and Data Protection Act 2018 conditions. We retain recruitment information only for as long as necessary to complete the recruitment process, fulfil legal obligations or defend potential legal claims. Personal information is stored securely and protected against unauthorised access, loss or misuse through appropriate technical and organisational measures. Having carefully balanced our legitimate interests with the rights and freedoms of applicants, SWAN Transport considers this processing to be necessary, proportionate and justified.

For more information on our use of legitimate interests as a lawful basis you can contact us using the contact details set out above.

- Recognised legitimate interests - our pre-approved purpose for collecting or using personal information for recruitment purposes:

  We need to share personal information with a public authority or another organisation because they need it for their public tasks or official functions (the 'public task disclosure response condition')., We need to safeguard national security, protect public security, or for defence reasons (the 'national security, public security and defence condition')., We need to respond to, or deal with, an emergency event or situation (the 'emergencies condition')., We need to prevent, detect, or investigate a crime, including the apprehension and prosecution of offenders (the 'crime condition')., We need to protect the physical, mental or emotional well-being of people who need extra support, or to protect them from harm or neglect (the 'safeguarding condition').
- Vital interests – collecting or using the information is needed when someone's physical or mental health or wellbeing is at urgent or serious risk. This includes an urgent need for life sustaining food, water, clothing or shelter. All of your data protection rights may apply, except the right to object and the right to portability.
- Public task – we have to collect or use your information to carry out a task laid down in law, which the law intends to be performed by an organisation such as ours. All of your data protection rights may apply, except the right to erasure and the right to portability.

Our lawful bases for collecting or using personal information for **dealing with queries, complaints or claims** are:

- **Consent** - we have permission from you after we gave you all the relevant information. All of your data protection rights may apply, except the right to object. To be clear, you do have the right to withdraw your consent at any time.
- **Contract** – we have to collect or use the information so we can enter into or carry out a contract with you. All of your data protection rights may apply except the right to object.
- **Legal obligation** – we have to collect or use your information so we can comply with the law. All of your data protection rights may apply, except the right to erasure, the right to object and the right to data portability.
- **Legitimate interests** – we're collecting or using your information because it benefits you, our organisation or someone else, without causing an undue risk of harm to anyone. All of your data protection rights may apply, except the right to portability. Our legitimate interests are:
  - SWAN Transport has a legitimate interest in collecting, using and retaining personal information to respond to enquiries, investigate complaints, resolve concerns and manage legal or insurance claims. Processing this information enables us to provide a high-quality service, improve our operations, protect the interests of individuals and the charity, and ensure that concerns are handled fairly, consistently and efficiently. We process personal information such as names, contact details,

correspondence, journey details, witness statements, incident reports and any other information relevant to the enquiry, complaint or claim. Where necessary, we may also process limited health or safeguarding information if it is directly relevant to understanding an incident or meeting our duty of care. We only collect information that is necessary to investigate and resolve the matter. This processing is necessary because we would be unable to properly investigate concerns, respond to individuals, establish the facts of an incident or defend or pursue legal or insurance claims without processing the relevant personal information. It also enables us to identify trends, learn from feedback, improve our services and fulfil our safeguarding, health and safety and governance responsibilities. The benefits of this processing extend to service users, volunteers, staff, trustees and the wider community. It helps ensure that concerns are taken seriously, complaints are resolved fairly, incidents are investigated appropriately and lessons are learned to improve the quality and safety of our services. It also protects the rights of individuals by ensuring decisions are based on accurate information and evidence rather than assumptions. We carefully balance these legitimate interests against the rights and freedoms of the individuals concerned. We only collect information that is relevant and proportionate to the issue being investigated, restrict access to authorised staff, trustees or professional advisers where necessary, and treat all information confidentially. Where information needs to be shared with insurers, legal advisers, regulators or statutory authorities, we only share what is necessary and where there is a lawful basis for doing so. Personal information is retained only for as long as required to resolve the matter, meet legal or regulatory obligations, or manage any ongoing legal proceedings. Appropriate technical and organisational measures are in place to protect information against unauthorised access, loss or misuse. Having carefully balanced our legitimate interests with the rights and freedoms of individuals, SWAN Transport considers this processing to be necessary, proportionate and justified. The benefits of resolving concerns fairly, improving our services, protecting vulnerable people and meeting our legal and governance responsibilities outweigh the limited privacy impact, particularly as strong safeguards are in place to ensure personal information is processed lawfully, fairly, transparently and securely.

For more information on our use of legitimate interests as a lawful basis you can contact us using the contact details set out above.

- Recognised legitimate interests - our pre-approved purpose for collecting or using personal information for dealing with queries, complaints or claims:

  We need to share personal information with a public authority or another organisation because they need it for their public tasks or official functions (the ‘public task disclosure response condition’)., We need to safeguard national security, protect public security, or for defence reasons (the ‘national security, public security and defence condition’)., We

need to respond to, or deal with, an emergency event or situation (the ‘emergencies condition’)., We need to prevent, detect, or investigate a crime, including the apprehension and prosecution of offenders (the ‘crime condition’)., We need to protect the physical, mental or emotional well-being of people who need extra support, or to protect them from harm or neglect (the ‘safeguarding condition’).

- **Vital interests** – collecting or using the information is needed when someone’s physical or mental health or wellbeing is at urgent or serious risk. This includes an urgent need for life sustaining food, water, clothing or shelter. All of your data protection rights may apply, except the right to object and the right to portability.
- **Public task** – we have to collect or use your information to carry out a task laid down in law, which the law intends to be performed by an organisation such as ours. All of your data protection rights may apply, except the right to erasure and the right to portability.

Where we get personal information from

- Directly from you
- Regulatory authorities
- Family members or carers
- Other health and care providers
- Social services
- Charities or voluntary sector organisations
- Schools, colleges, universities or other education organisations
- Insurance companies
- Publicly available sources
- Councils and other public sector organisations
- Previous employers
- Suppliers and service providers
- Networking and information sharing events

How long we keep information

[Insert information about how long you store personal information here.]

[You said you didn't have a retention schedule, or you weren't sure. Once you've downloaded or copy and pasted this privacy notice, you can fill the information in above. **You must not publish the privacy notice without it.**

For more information, see our guidance on how long you should store information (opens in a new window).]

Who we share information with

Others we share personal information with

- Other health providers (eg GPs and consultants)
- Insurance companies, brokers and other intermediaries
- Charities and voluntary organisations
- Care providers
- Organisations we need to share information with for safeguarding reasons
- Emergency services
- Professional advisors
- Legal bodies or authorities
- Local authorities or councils
- Relevant regulatory authorities
- External auditors or inspectors
- Organisations we're legally obliged to share personal information with
- Publicly on our website, social media or other marketing and information media
- Current employers
- Previous employers
- Suppliers and service providers

How to complain

If you have any concerns about our use of your personal information, you can make a data protection complaint to us:

Email: ceo@swan-transport.co.uk

Telephone: 01761 439548

Post: SWAN Advice Network Unit B 1 Waterloo Road Radstock BANES BA3 3EP

If you remain unhappy with how we've used your data after raising a complaint with us, you can also complain to the ICO.

The ICO's address:

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

Helpline number: 0303 123 1113
Website: https://www.ico.org.uk/make-a-complaint