

## Cambridge Cancer Help Centre (CCHC) – Privacy Statement.

Our website is open to the public and has been established by CCHC in order that all interested persons can learn more about us. Anyone can visit our site anonymously to find out about our services. We are committed to safeguarding the privacy of visitors to this site. The following statement explains personal information we may collect and how such information is treated. Should this policy change a notice to that effect will be displayed on our home page.

### 1. Cookies

1.1. A cookie is a small amount of information which is stored by your web browser on your computer's hard drive when you access the website. 1.2. The cookies store and track information concerning your use of the website, such as the pages accessed and the date and time of such access. The information is collected in the name of your internet service provider. 1.3. This information enables CCHC to generate statistics and measure site activity. We may use this information to improve the effectiveness of your visit to the website and where appropriate to deliver to you a better and more personalised service. 1.4. Most web browsers automatically accept cookies, but you can usually change your browser to prevent this. You may not be able to use all the features on CCHC's website if your browser does not accept cookies or if you have altered your web browser accordingly.

### 2. Personal Information collected by CCHC

2.1. During normal use of the website CCHC does not collect personal information about you. 2.2. Where you are required to register for a particular service CCHC will collect adequate and relevant personal information necessary for performing that service. 2.3. Where CCHC collects personal information, a link will be provided to this statement and you will be required to confirm that you have read it before access to the appropriate service will be granted.

### 3. How CCHC uses the Information

3.1. CCHC's primary purpose for collecting personal information is to offer services to you. 3.2. CCHC is committed to improving its website and online services and may use information to achieve this. We have updated our Privacy Policy to comply with the UK GDPR. You may unsubscribe, ensuring your personal information is removed from our records, at any time.

### 4. Information Sharing

4.1. CCHC does not sell trade or rent your personal information to others. CCHC does not subject to paragraphs 4.2 and 4.3 below provide your personal information to any third party save where it is required to do so by law. 4.2. Where a particular service is provided in conjunction with a third party CCHC will need to share your personal information with that third party. Your personal information will be provided solely for the purpose of providing

the relevant service. This will be made clear when you register for the service. 4.3. CCHC will not in any event share your personal information with any third party without your express consent to do so. 4.4. CCHC may provide to third parties aggregate statistics concerning the use of the website. Such information will include no personally identifying information.

## 5. Your choices concerning the use of your Personal Information

5.1. You may at any time request that CCHC delete all your personal information held in relation to any service. This will result in you not being able to use the relevant service. You may at any time re-register with any service. 5.2. You may request from CCHC details of all your personal information collected and stored by us. 5.3. Should your personal information change at any time you may inform CCHC and request your personal information is updated.

## 6. Consent

6.1. By using the website(s) you consent to the collection and use of your personal information for the purposes specified. 6.2. You will be required to indicate your express consent where CCHC may share your personal information with third parties or where you are providing 'sensitive' information. In all cases, in compliance with the UK GDPR this will be made clear.

## 7. Privacy

7.1. CCHC is committed to maintaining your privacy. 7.2. Whenever CCHC collects and stores personal information it takes steps to ensure that the personal information is treated securely in accordance with this policy. CCHC cannot ensure or warrant the security of any information which you transmit to CCHC and you do so at your own risk. Once CCHC receives your transmission it makes its best efforts to ensure its security on its systems.

If you need to contact us about this policy email: [contact@cambridgecancerhelp.org](mailto:contact@cambridgecancerhelp.org) or write to us marking your correspondence "Privacy Policy", at:

Cambridge Cancer Help Centre,  
120 Cambridge Road,  
Great Shelford,  
Cambridge. CB22 5JT

## Cambridge Cancer Help Centre (CCHC) – UK GDPR Policy.

This policy document includes references to relevant sections of the UK GDPR, meaning Regulation (EU) 2016/679 of the European Parliament and of the Council of 27th April 2016 on the protection of natural persons with regard to the processing of personal data and on free movement of data (General Data Protection Regulation) as part of the law of England, Wales, Scotland and Northern Ireland due to section 3 of the European Union (Withdrawal) Act 2018.

### 1 Awareness

The decision makers and key people at CCHC are aware that the law has changed under the UK GDPR. They appreciate the impact this is likely to have and have considered areas that could cause problems and put steps in place to achieve compliance.

**1.1** We have appointed one **Controller** at CCHC who holds the position of **Chair of Trustees**. A controller determines the purposes and means of processing personal data. Furthermore, they will ensure processors comply with the UK GDPR.

**1.2** We have appointed two **Processors** at CCHC from The Centre Management Team who hold the positions of **Centre Manager, and Operations Coordinator**. The UK GDPR places specific legal obligations on processors; to maintain records of personal data and processing activities and not to cause a breach. If in any doubt that they may do so, it is our policy that a processor obtains written confirmation from the controller that this will not be the case.

### 2 Information we hold

We document the personal data we hold, where it comes from, and instances where we share any such data with external organisations. The UK GDPR requires us to maintain records of processing activities and comply with the UK GDPR's accountability principle, which requires us to be able to show how they comply by having effective policies and procedures in place.

**2.1** We hold data in categories of **employees, members, trustees, volunteers, suppliers**, including candidates for positions, and anyone having a **legitimate interest** in our charity.

### 3 Communicating privacy information

We have reviewed our privacy statement and have the following in place for UK GDPR.

**3.1** When we collect personal data, we identify ourselves and how we use information. We explain the lawful basis for processing data, our retention periods and that individuals have a right to complain if they think there is a problem with the way we are handling their data.

### 4 Individuals' rights

We have checked our procedures to ensure they cover all the rights individuals have, including how we delete personal data or provide data electronically and in a commonly used format. We conclude that under the UK GDPR we comply with the rights for individuals. These include the rights: to be informed; of access; to rectification; to erasure; to restrict

processing; to data portability; to object; and not to be subject to automated decision-making including profiling.

**4.1** The criteria for deletion decisions is made by the **Controller** and actioned by the **Processors**.

## **5 Subject access requests**

We will handle requests within 1 month, at no charge, that are not manifestly unfounded or excessive. If we refuse a request, we will explain why, and that there is a right to complain to the authorities and to a judicial remedy, without undue delay and at latest, within 1 month.

## **6 Lawful basis for processing personal data**

We have identified the lawful basis for our processing activity in the UK GDPR

**6.1** We note these to be **Consent** and **Legitimate Interest**

## **7 Consent and Legitimate Interest**

We have reviewed how we seek, record, and manage consent and implemented changes. We have read the detailed guidance and checklist on consent under the UK GDPR.

**7.1** We establish that Consent must be freely given, specific, informed, and unambiguous. There must be a positive opt-in. Consent is not inferred from silence, pre-ticked boxes, or inactivity. It is also to be kept separate from other terms and conditions, and we offer simple ways for people to withdraw consent. All consent obtained is verifiable.

**7.2** We also use data where we establish legitimate interest. This is appropriate where we use data in ways that are reasonably expected, which have minimal privacy impact, or where there is a compelling justification for the processing.

**8 Children** - We do not currently have any data processing activity involving children.

## **9 Data Breaches**

We have established a new procedure to detect, report and investigate data breaches. We acknowledge that the UK GDPR introduces a duty to report certain types of data breach and in some cases, to individuals.

**9.1** We will notify the **Controller** who will notify a breach and any individual potentially affected, where it is likely to result in a risk to rights and freedoms such as discrimination, damage to reputation, financial loss, confidentiality or other significant economic or social disadvantage.

## **10 Data Protection by Design and Data Protection Impact Assessments**

We acknowledge that the UK GDPR makes privacy by design an express legal requirement, under the term 'data protection by design and by default'. It also makes PIAs, referred to as 'Data Protection Impact Assessments' or DPIAs, mandatory in certain circumstances.

**10.1** Our policy is to conduct a DPIA whenever a new technology is being deployed, and we believe that the data processing will not be high risk.

### **11 Data Protection Officers**

We do not believe that we are required to formally designate a Data Protection Officer.

**11.1** All data protection is the responsibility of the **Controller**, implemented by the **Processors**.

**12 International** - Our organisation does not operate outside of the United Kingdom.

This policy was adopted at a Trustee sub-committee meeting of Cambridge Cancer Help Centre on the 22<sup>nd</sup> Oct 2020, and will be reviewed in Oct 2022, or if there are updates to the UK GDPR.

Signed by: Edward Sage Chair of Trustees  
23<sup>rd</sup> October 2020



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