



# Thera Trust Privacy Notice

This privacy notice is provided in a layered format so you can easily find the information that is applicable to you.

We have organised this privacy notice by audience as we believe this is the clearest way to inform people about how we collect and use their personal data.

Please click the headings or subheadings to read the full text under each heading.

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# About Us

We are a charitable group of companies referred to collectively as “Thera Group”, and we support people with a learning disability to live the life they choose (“Thera Group”, “we”, “use” or “our”).

Our group includes:

- Thera Trust,
- Thera North,
- Thera East Midlands,
- Thera East Anglia,
- Thera East,
- Thera South West,
- Thera (Scotland),
- Forward Housing,
- Dosh Ltd,
- The Quality Company Ltd,
- The Camden Society,
- Unity Works Social Enterprises,
- The Camden Society (London),
- Aspire Living Ltd,
- Equal Futures,
- Ansar Projects Ltd,
- Thera North Trading Ltd,
- Thera East Midlands Trading Ltd,
- Thera East Anglia Trading Ltd,
- Thera East Trading Ltd,
- Thera South Midlands Trading Ltd,
- Thera South West Trading Ltd,
- Thera (Scotland) Trading Ltd,
- The Camden Society Trading Ltd, • Aspire Living Trading Ltd, and • Ansar Projects Trading Ltd.

This privacy notice applies to all entities within Thera Group. It explains how we collect, use, disclose and protect your personal data, and it supplements other privacy notices you may receive from us. Sometimes we may need to further process information that we have already collected for a different purpose. We will only do this if the new purpose for processing is compatible with the original purpose that the data was collected for, and we will inform you about any further processing before carrying it out.

We act as the data controller for the personal data described in this privacy notice. This means that we determine the purposes and means of processing your personal data in compliance with applicable data protection laws, including (but not limited to)

the UK GDPR (General Data Protection Regulation) and ePrivacy laws. We are [registered with the ICO](#) (registration number Z9387616).

We operate the website [www.thera.co.uk](http://www.thera.co.uk).

## How to contact us

Thera Group has appointed a Data Protection Officer (DPO) to oversee our data protection compliance.

If you have any questions or concerns about how we handle your personal data, please contact our DPO as follows:

|               |   |
|---------------|---|
| By post:      | The West House, Alpha Court, Swingbridge Road, Grantham, Lincolnshire, NG31 7XT |
| By email:     | <a href="mailto:dataprotection@thera.co.uk">dataprotection@thera.co.uk</a>      |
| By telephone: | 0300 303 1280   |

## What is meant by “personal data”?

Personal data is information which identifies you as an individual. Examples of personal data include anything which may identify you, directly or indirectly, such as your name, address, bank account details, internet protocol (IP) address, username or another identifier.

Some information about you is sensitive and requires greater protection. This data is referred to as special category data. Examples of special category data includes information regarding your health, genetic or biometric information, religious or philosophical beliefs, race, or ethnicity to provide a few examples.

### **Where we get your information from**

In most cases, the personal data we collect is obtained directly from you. The tables below provide details of the data collected. In some cases, we also receive information from third parties such as commissioners, local authorities, health and social care professionals, previous support providers, recruitment agencies, family members or legal representatives, and publicly available sources. We only obtain information from third parties where it is lawful and necessary to do so and will explain this to you wherever appropriate.

# Categories of people whose personal data we process

## People Supported

Everyone is different. We will only collect and keep the personal data we need to provide the support required by you. This table sets out how the personal data we might process about you, depending on your needs.

| Data we collect and why  | Lawful basis for processing  | Where the data is collected from  |
|--|--|---|
| <p><b>Getting to know you information:</b><br/>           This is information that allows us to discover your needs and plan how we will support you before we start. It may include the following and without this information we will not be able to support you:</p> <ul style="list-style-type: none"> <li>• Full name,</li> <li>• Age/date of birth,</li> <li>• Gender,</li> <li>• Postal address,</li> <li>• Marital/living status,</li> <li>• Telephone number(s),</li> <li>• Email address,</li> <li>• IP address,</li> <li>• Next of kin and their contact details,</li> <li>• Name of your landlord, full address, telephone number and email address,</li> <li>• GP and care provider(s),</li> <li>• National Insurance number,</li> <li>• Any reference number from your local authority,</li> <li>• Any reference number to receive benefits payments,</li> </ul> | <p><b>Contract:</b> If you, or the person who has a Power of Attorney, Deputyship, Appointeeship or Guardianship for you are looking to take out a contract with us to provide a service.</p> <p>Or</p> <p><b>Public Task:</b> If the local authority is looking to take out a contract with us to provide support to you.</p> | <ul style="list-style-type: none"> <li>• Yourself</li> <li>• The person who has a Power of Attorney, Deputyship, Appointeeship or Guardianship for you,</li> <li>• Possibly those involved in your current support</li> <li>• Family, friends, Circles of Support</li> <li>• The local authority</li> </ul> |

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| <ul style="list-style-type: none"> <li>• Your bank account details and balance and any assets or savings,</li> <li>• Your current benefits, and</li> <li>• Any other information provided on the 'Getting to Know You' form or your Individual Agreement.</li> </ul> |  |  |
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| <p><b>Supporting you:</b><br/>This is information about you, your support and the requirements for that support.</p> <p>The types of information we may process about you are, for example: Your likes and dislikes, life history, dreams and aspirations, utility suppliers, contact details of people who need to know your address, financial information, last person or organisation which supported you, details of anyone else who supports you (including other companies within the Thera Group).</p> <p>We may also need to process the following information that is special category data: Current health, medical history, details of any medicines, details of your doctor, how you respond to people and situations, information in your Personal Care Plan, or Community Treatment Plan.</p> | <p><b>Contract:</b> If you, or the person who has a Power of Attorney, Deputyship, Appointeeship or Guardianship for has signed a contract with us to provide a service.</p> <p>Or</p> <p><b>Public Task:</b> If the local authority has a contract with us to provide support to you.</p> <p><b>Special Category Data:</b> We process this information under the provision of health and social care</p> <p><b>Criminal Offence Data:</b> If necessary we will process this information in line with Category 10 rules of GDPR</p> | <ul style="list-style-type: none"> <li>• You</li> <li>• Our records and staff</li> <li>• Previous employers</li> <li>• Family, friends, circles of support</li> <li>• Person who has a Power of Attorney for you</li> <li>• External sources such as previous care providers/ support workers/ advocates/ medical staff/ financial advisors and brokers/ DWP and other benefit agencies/local authorities/credit reference agencies</li> <li>• other companies within the</li> <li>• Thera Group</li> <li>• Online support systems</li> <li>• Various surveys/HR</li> <li>• Software Provider/ internal Group documents</li> <li>• Specific permission sought from circles of</li> </ul> |
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| <p>It may also be appropriate in respect of the support we provide to collect information about any relevant convictions you may have.</p> |  | <p>support/ general research findings</p> |
| <p><b>Other information about you</b></p>  | <p><b>Contract:</b> If you, or the person who has a Power of Attorney,</p> |   |

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| <p>This is information you would like us to have.</p> <p>The types of information we may process about you are, for example: contact details of friends, family or neighbours, Power of Attorney, bank details and direct debit information, your credit history, anything from your existing support staff if they become our employee, voice and video recordings for safety, and quality management, details of any complaints you might make and how we deal with these, as well as any other information you may think is relevant to helping us support you.</p> <p>We may also process the following information, which may include criminal offence data, for safeguarding purposes:</p> <p>DBS searches and voice or video recordings.</p> | <p>Deputyship, Appointeeship or Guardianship for has signed a contract with us to provide a service/support to you.</p> <p>Or</p> <p><b>Public Task:</b> If the local authority has a contract with us to provide support to you.</p> <p><b>Criminal Offence Data:</b> If necessary we will process this information in line with Category 10 rules of GDPR</p> |  |
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| <p><b>Thera Group communications/ documents</b></p> <p>We may sometimes ask if you would like to appear in our marketing materials and other documents. This might be our Thera Voice newsletter, on Thera’s website and other social media sites, our annual report and accounts, photos for other Thera Group websites, and at special occasions like Thera’s Anniversary Celebrations that may result in photographs being taken. We may also ask to use information about you for our staff training documentation.</p> <p>The information we may ask to process are name, photo and video images, details of your story, and information about members of your circle of support.</p> | <p><b>Consent:</b> We will always ask for your explicit consent for the use of your personal information in relation to marketing materials. If you decide that you do not want us to use an image or film about you again you will be able to <a href="#">withdraw your consent</a>. You will also be allowed to specify that you do not want your real name to be used.</p> | <ul style="list-style-type: none"> <li>• You</li> <li>• Our records and staff Family, friends, circles of support</li> <li>• Other companies within the Thera Group</li> <li>• The local authority</li> </ul>            |
| <p><b>Research materials</b></p> <p>A Social Impact Report is produced in connection with Thera’s charity bond on an annual basis to show the social impact and financial performance of the Thera Group. This piece of work specifically includes ongoing impact management within the Thera Group to plan and prioritise action and resources. Other pieces of research work (including</p>  | <p><b>Legal Obligation:</b> There is a legal requirement for Thera to produce a ‘Social Impact Report’ for investors and the charity bonds under contract.</p> <p><b>Consent:</b> We will always ask for your explicit consent if we would like to specifically mention you or have an image of you in a research report.</p>   | <ul style="list-style-type: none"> <li>• You</li> <li>• Our records and staff</li> <li>• Family, friends, circles of support</li> <li>• Other companies within the Thera Group</li> <li>• The local authority</li> </ul> |

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| <p>work with King’s College, London) fall into this category.</p> <p>In many cases research materials are anonymised.</p> <p>The types of information we may process are photo images, details of your story and current support (which may include health and housing matters) members of your circle of support, your gender and your age.</p>   | <p><b>Special Category Data:</b><br/>We will be legally processing this information under the provision of archiving research and statistics.</p>   |  |
| <p><b>Tenders</b><br/>We will provide information about the various kinds of support we provide to people to show our experience and suitability for a support contract.</p> <p>Whilst we may process your personal data to prepare our tender responses, we will always anonymise your information before it is released. However, where photographs are used in tender responses, this may identify you.</p> | <p><b>Legitimate interest:</b><br/>Tenders are generated to enable us to obtain additional or extended contracts to support more people.</p> <p><b>Consent:</b> We will obtain consent for any images to be used and you can <a href="#">withdraw consent for future use</a>.</p> | <ul style="list-style-type: none"> <li>• You</li> <li>• Our records and staff<br/>Family, friends, circles of support</li> <li>• Other companies within the Thera Group</li> </ul>               |
| <p><b>Emergency contact information</b><br/>Your family members (those with direct involvement with Thera Group) will be asked to provide emergency contact details in case of an accident or incident. We feel strongly about our duty of care to those we support, our staff and volunteers and believe</p>  | <p><b>Legitimate interest:</b> We want to be able to inform someone of your situation if you are not able to do so yourself.</p>  | <ul style="list-style-type: none"> <li>• You</li> <li>• For people we support this may be provided by their legally appointed representative, a family member of the local authority.</li> </ul> |

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| <p>that most would want someone to be informed.</p> <p>The information collected for this may include your name, your relationship to Thera Group, the name of your emergency contact, their telephone number(s), their email address and their postal address.</p> |  |  |
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## Young people

Some companies within Thera Group provide support to children and young people to undertake activities such as youth clubs.

| <b>Data we collect and why</b>   | <b>Lawful basis for processing</b> | <b>Where the data is collected from</b>   |
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| <p>We will collect personal information such as your name, home address, and contact details so that we can keep accurate records and know who is attending the youth club.</p> <p>This information is collected for the following reasons:</p> <ul style="list-style-type: none"> <li>• Health and safety purposes, including fire evacuation procedures</li> <li>• Recording attendance</li> <li>• Processing payments for youth club sessions</li> <li>• Contacting you or your parent/carer about upcoming events, activities, or important updates</li> </ul> | <p>Part of a contract</p>          | <p>The parent/guardian<br/>The child, if over 13 years old and considered competent to provide this information accurately.</p> |

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| <p>In some cases, we may also need to collect personal data and special category data where necessary to ensure the safety and wellbeing of all attendees.</p> <p>All information collected will be handled securely and in accordance with data protection regulations.</p>  |  |   |
| <p><b>Emergency contact information</b></p> <p>This information will be requested for all children and young people attending activities provided by Thera Group. It is required so that parents/guardians can be contacted in the event of an accident or incident during the activity.</p> <p>The information collected for this may include the child/young person's name, the name of their emergency contact, the relationship between the child/ young person and their emergency contact, the emergency contacts telephone number(s), and email address.</p> | <p><b>Legitimate interest:</b></p> <p>We need to be able to inform someone of the situation about an accident or incident if the child/young person is not able to do so for themselves.</p> | <p>The parent/guardian<br/>The child, if over 13 years old and considered competent to provide this information accurately.</p> |
| <p><b>How long will we keep your information for?</b></p> <p>Until you are 25 or 6 years after the last update of your information. Emergency contact information will be kept for 2 years from the date your support ended.</p>  |  |   |

Our website is not directed to children under the age of 18, and we do not knowingly collect or process personal data from children save for in the instances stated above. If we become aware that we have inadvertently collected additional personal information from a child without appropriate parental or guardian consent, we will

take steps to delete the information as soon as possible. If you believe we may have inadvertently collected data from a child, please [contact us](#).

## Family and friends

Thera Group acts as a family. Anyone directly involved with us as an employee, a supported person or volunteer is part of our family. This section provides information on the personal data we process for the family members of supported people and their friends (including professional friends, such as care managers).

| Data we collect and why   | Lawful basis for processing   | Where the data is collected from   |
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| <p><b>Emergency contact information</b><br/>We may collect the emergency contact details for the family of supported people, staff and volunteers because we feel strongly about our duty of care to them and believe that most would want someone to be informed if they were involved in an accident.</p> <p>The information collected for this may include your name, your relationship to Thera Group, the name of your emergency contact, their telephone number(s), their email address and their postal address.</p> | <p><b>Legitimate interest:</b><br/>We want to be able to inform someone if a supported person, employee or volunteer is involved in an accident or emergency and they are not able to do so themselves.</p> | <ul style="list-style-type: none"> <li>• You</li> <li>• A supported person</li> </ul>            |
| <p><b>Marketing materials</b><br/>Friends and family can 'sign up' for marketing materials. These can be newsletters, general information about the organisation or notifications about events in the local area.</p> <p>To send you marketing materials, we will need to collect your name, contact</p>  | <p><b>Consent:</b> This information will only be sent if you have given us permission. Your consent can be <a href="#">withdrawn</a> at any time.</p>   | <ul style="list-style-type: none"> <li>• You</li> <li>• Your friend or family member.</li> </ul> |

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| telephone number(s), email address and postal address.   |  |  |
| <b>How long will we keep your information for?</b>   |  |  |
| Emergency contact information will remain with the individual's file. Please see how long we will keep your information for people we support, staff and volunteers. Marketing information will remain on the system for 2 years unless a request to withdraw consent has been received. |  |  |

## Staff, applicants and agency workers

Our staff are at the centre of everything we do. Without them we would not be able to help the people we support on a daily basis. The information we collect and process about our (potential) staff is what we need to process legally as an (prospective) employer and so we can support them in the valuable work they do.

| <b>Data we collect and why</b>  | <b>Lawful basis for processing</b>  | <b>Where the data is collected from</b>   |
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| <p><b>Recruitment</b><br/>We need information about you to ascertain your suitability for the position. You may be transferring from another service provider or applying through a recruitment agency.</p> <p>Information that we would need to process would include your full name, date of birth, contact details, possibly TUPE transfer information, as well as reference requests and your National Insurance number.</p> <p>Special category data relating to your enhanced DBS/PVG check, eligibility to work in the UK information, and occupational health referrals and disabilities.</p> | <p><b>Contract:</b> This is so we can employ you with a Contract of Employment.</p> <p><b>Special Category Data:</b> This information is processed because of employment, social security and social protection law.</p> <p><b>Criminal Offence Data:</b> The processing of criminal information (DBS/PVG check) is for safeguarding reasons.</p> | <ul style="list-style-type: none"> <li>• You</li> <li>• Disclosure Barring Service / Disclosure Scotland</li> <li>• Health Management portal</li> <li>• Referees or previous employers</li> <li>• Other care providers</li> <li>• Recruitment agency/consultants</li> </ul> |

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| <p>Criminal Offence Data may be contained within your enhanced DBS/PVG check.</p>   |   |  |
| <p><b>Payroll</b><br/>Depending on how much you earn, there is a legal obligation to pay income tax and National Insurance contributions. We may also be required to offer you a workplace pension, and allow you to make necessary, and additional voluntary contributions to this pension. These will be deductions from your salary and will be shown on your pay slip.<br/>We will need to process your name, bank details, income tax payments, National Insurance contributions, pension enrolment and contributions as well as your salary, sick pay, maternity pay, expense claims and attachment of earnings deductions.</p> | <p><b>Legal Obligation:</b> we must share your salary information with the HMRC to pay income tax and National Insurance contributions, etc. If you take up our workplace pension, we also need to document your normal and voluntary contributions.</p> <p><b>Legitimate interest:</b> Authorised expenses are recorded to allow the Company to understand where money is being spent.</p> | <ul style="list-style-type: none"> <li>• You</li> <li>• HMRC and DWP</li> <li>• Your manager</li> <li>• Other Thera Companies</li> </ul> |

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| <p><b>HR Employment record</b><br/>Performance management documentation including staff reviews, capability and disciplinary processes. As well as special category data relating to occupational health referrals and adjustments for colleagues with disabilities.</p> | <p><b>Contract:</b> This is so we can be sure everything is being achieved as per your contract of employment.</p> <p><b>Special Category Data:</b> Occupational health information and information relating to disabilities are processed because of employment, social</p> | <ul style="list-style-type: none"> <li>• You</li> <li>• Your manager</li> <li>• Other staff and internal documents</li> <li>• Occupational health services</li> <li>• Health Management Portal</li> <li>• Various surveys</li> <li>• HR Software provider</li> </ul> |
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|   | security and social protection by law.   |   |
| <p><b>IT Information/monitoring</b><br/>The company's IT Team perform monitoring of its systems. This can include account details, email, internet use, access to online systems, GPS logs and usage or company provided devices history and logs.</p>  | <p><b>Legitimate interests:</b><br/>This processing helps to ensure our systems remain compliant with relevant legislation, provide an acceptable level of service and help show adherence to company set Information Security Data policies by staff members.</p>               | <ul style="list-style-type: none"> <li>• System logs</li> <li>• IT devices</li> <li>• You</li> </ul>  |
| <p><b>Thera communications/documents</b><br/>We may sometimes ask if you would like to appear in our marketing materials and other documents. This might be our Thera Voice newsletter, Thera's website and other social media, annual report and accounts, photos for the Thera Group websites and special occasions like Thera's Anniversary Celebrations. We may also ask to use information about you for our staff training documentation. This may include your name, photo images or videos of you, information about your story/life.</p> | <p><b>Consent:</b> We will always ask for your consent for the use of your personal information in relation to marketing materials. If you decide that you do not want us to use an image or film about you again you will be able to <a href="#">withdraw your consent</a>.</p> | <ul style="list-style-type: none"> <li>• You</li> <li>• Your manager</li> <li>• Other staff and internal</li> <li>• documents</li> </ul>                |
| <p><b>Health and Safety incident reports</b><br/>This may include details of any incidents and photos. It may therefore need to include, your name, photo images or videos including</p>  | <p><b>Legal obligation:</b> This is necessary for our obligations as an employer for the Health and Safety at Work Act, RIDDOR etc.</p>  | <ul style="list-style-type: none"> <li>• You</li> <li>• Your manager</li> <li>• Other staff and internal</li> <li>• documents<br/>Health and</li> </ul> |

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| you, information about your involvement.   |   | Safety documentation   |
| <p><b>Research materials</b><br/>A Social Impact Report is produced in connection with Thera’s charity bond on an annual basis to show the social impact and financial</p> | <p><b>Legal Obligation:</b><br/>There is a legal requirement for Thera to produce a ‘Social Impact Report’ for investors and the charity bonds.</p> | <ul style="list-style-type: none"> <li>• You</li> <li>• Your manager</li> <li>• Other Thera Companies</li> </ul> |

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| <p>performance of the Thera Group. This piece of work specifically includes ongoing impact management within the Thera Group to plan and prioritise action and resources. Other pieces of research work (including work with King’s College, London) fall into this category.</p> <p>Research specific materials are collected anonymised and in this case, our lawful basis is consent. Where research materials are not anonymised, your consent will be obtained.</p> <p>The types of information we may process are photo images, details of your story and current support (which may include health and housing matters) members of your circle of support, your gender and your age.</p> | <p><b>Consent:</b> We will always ask for your consent if we would like to specifically mention you in a research report, and</p> <p><b>Special Category Data:</b> We will be legally processing this information under the provision of archiving research and statistics</p> |  |
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| <p><b>Tenders</b></p> <p>We will provide information about the various kinds of support we provide to people and organisations to show our experience and suitability for a support contract. Whilst we may process your personal data to prepare our tender responses, we will always anonymise your information before it is released. However, where photographs are used in tender responses, this may identify you.</p>   | <p><b>Legitimate interest:</b></p> <p>Tenders are generated to enable us to obtain additional or extended contracts to support more people</p> <p><b>Consent:</b> We will obtain consent for any images to be used and you can <a href="#">withdraw consent</a> for future use.</p> | <ul style="list-style-type: none"> <li>• You if consent for an image is required.</li> <li>• Other staff</li> </ul> |
| <p><b>Emergency contact information</b></p> <p>Our family members (those with direct involvement with Thera Group) will be asked to provide emergency contact details in case of an accident or incident. We feel strongly about our duty of care to those we support, our staff and volunteers and believe that most would want someone to be informed.</p> <p>The information collected for this may include your name, your relationship to Thera Group, the name of your emergency contact, their telephone number(s), their email address and their postal address.</p> | <p><b>Legitimate interest:</b></p> <p>We want to be able to inform someone of your situation if you are not able to do so yourself.</p>   | <ul style="list-style-type: none"> <li>• You</li> <li>• A supported person</li> </ul>                               |

## Volunteers

Volunteers are used in a variety of roles and provide an invaluable service to Thera Group and the people we support. They are not paid and the information we collect about our volunteers is to ensure that the people we support are safe and to make the best use of the time and expertise of our volunteers.

| Data we collect and why   | Lawful basis for processing  | Where the data is collected from  |
|---|--|---|
| <p><b>Recruitment</b><br/>We need to know about you so that we can make the best use of your time and expertise. We will collect information like your name, age, date of birth, contact details such as telephone number and email address, employment history, information on your CV and references. We also conduct an enhanced DBS/PVG check which will reveal personal data about you, including your National Insurance number. A DBS/PVG check may also reveal criminal offence data about you.</p> | <p><b>Legitimate interest:</b><br/>This is so we can engage you as a volunteer. Our legitimate interest is to provide you with opportunity within the company.</p> <p><b>Criminal Offence Data:</b> We are permitted to process the criminal information (DBS/PVG check) for safeguarding reasons.</p> | <ul style="list-style-type: none"> <li>• You</li> <li>• Disclosure Barring Service/<br/>Disclosure Scotland</li> <li>• Referees</li> <li>• Previous training providers</li> </ul> |
| <p><b>Payroll</b><br/>While you are not paid for your time you will be able to claim expenses such as travel, etc. Your name and bank details will be required to process expense claims.</p>   | <p><b>Legitimate interest:</b><br/>This is so we can pay any authorised expenses as well as keep a track of how the Company money is being spent.</p>  | <ul style="list-style-type: none"> <li>• You</li> <li>• Your Company point of contact.</li> </ul>   |
| <p><b>IT Information</b><br/>This information is collected to assist with the use of IT equipment, systems and processes that volunteers may be asked to use. Information such as name, email address, account</p>  | <p><b>Legitimate interest:</b><br/>This is to help ensure that our systems remain secure and compliant with relevant legislation, provide an acceptable level of service and ensure</p>  | <ul style="list-style-type: none"> <li>• You</li> <li>• Your IT devices</li> </ul>  |

|  |   |   |
|--|---|---|
| <p>access details, IP addresses and information about devices connected to our systems may also be collected.</p>  | <p>adherence to the company's information security policies.</p>  |   |
| <p><b>Thera communications/documents</b></p>   | <p><b>Consent:</b> We will always ask for your consent for the use of</p>   | <ul style="list-style-type: none"> <li>• You</li> </ul>   |
| <p>We may sometimes ask if you would like to appear in our marketing materials and other documents. This might be our Thera Voice newsletter, Thera's website and other social media, annual report and accounts, photos for the Thera Group websites, special occasions like Thera's Anniversary Celebrations We may also ask to use information about you for our staff training documentation.</p> <p>This may include your name, photo images or videos of you, information about your story/life.</p> | <p>your personal information in relation to marketing materials. If you decide that you do not want us to use an image or film about you again you will be able to <a href="#">withdraw your consent</a>.</p>           | <ul style="list-style-type: none"> <li>• Your Company point of contact</li> <li>• Other staff</li> </ul>            |
| <p><b>Tenders</b><br/>We will provide information about the various kinds of support we provide to people and organisations to show our experience and suitability for a support contract. Whilst we may process your personal data to prepare our tender responses, we will always anonymise your information before it is</p>  | <p><b>Legitimate interest:</b><br/>Tenders are generated to enable us to obtain additional or extended contracts to support more people</p> <p><b>Consent:</b> We will obtain consent for any images to be used and</p> | <ul style="list-style-type: none"> <li>• You if consent for an image is required.</li> <li>• Other staff</li> </ul> |

|  |   |   |
|--|---|---|
| <p>released. However, where photographs are used in tender responses, this may identify you.</p>   | <p>you can <a href="#">withdraw consent</a> for future use.</p>   |   |
| <p><b>Emergency contact information</b><br/> Our family members (those with direct involvement with Thera Group) will be asked to provide emergency contact details in case of an accident or incident. We feel strongly about our duty of care to those we support, our staff and volunteers and believe that most would want someone to be informed.</p> <p>The information collected for this may include your name, your relationship to Thera Group, the name of your emergency contact, their telephone number(s), their email address and their postal address.</p> | <p><b>Legitimate interest:</b><br/> We want to be able to inform someone of your situation if you are not able to do so yourself.</p> | <ul style="list-style-type: none"> <li>• You</li> <li>• A supported person</li> </ul> |
| <p><b>How long will we keep your information for?</b><br/> We will delete your details from our systems 2 years after the date you cease volunteering.<br/> We may ask if we can keep some information about you as an example of the 'Life of Thera'. This will be so it can be added to our historical archive documenting the Company's history. This information is kept indefinitely.</p>   |   |   |

## Donors

We recognise and value each contribution made to support our work. If you donate to Thera Group, we will process your personal data as follows.

| Data we collect and why  | Lawful basis for processing   | Where the data is collected from  |
|--|---|---|
| <p><b>Process your donation</b><br/>If you donate to support our work, we need to process your personal data to facilitate that payment and record it in our accounts.</p> <p>The information collected for this may include your name, your bank account details, your telephone number, your email address and your postal address.</p>  | <p><b>Legitimate interest:</b> We wish to use your details to ensure your donation is processed accurately.</p>                                       | <ul style="list-style-type: none"> <li>• You</li> <li>• A supported person</li> </ul> |
| <p><b>Marketing materials</b><br/>You can ‘sign up’ for marketing materials that will keep you informed about the work we do and how any donation you make enables us to deliver our services to supported people. Marketing materials can include newsletters, general information about the organisation or notifications about events in the local area.</p> <p>To send you marketing materials, we may collect your name, contact telephone number(s), email address and postal address.</p> | <p><b>Consent:</b> This information will only be sent if you have given us permission. Your consent can be <a href="#">withdrawn</a> at any time.</p> | <ul style="list-style-type: none"> <li>• You</li> </ul>                               |

**How long will we keep your information for?**

8 years after the last donation we receive.

## Sharing your personal data

For some processing purposes we share your personal data with third parties. This is a list of the information we may share with external recipients, and for what purpose:

| <b><u>People Supported</u></b>  |  |
|---|--|
| <b>Recipients of your data</b>  | <b>Purpose for sharing</b>   |
| Potential employers   | Providing references   |
| Government bodies, e.g. Care Quality Commission (CQC), Scottish Care Inspectorate, The Charity Commission, OSCR | Providing information on request/ statutory filing                     |
| Other Thera Group companies   | Support information for services they provide/ data management sharing |
| Barclays Bank including Barclays.net online banking   | Providing managed client accounts                                      |
| Other care staff who support you  | Providing continuity of support and best interests decision making     |
| DWP and other benefits agencies/banks   | Data management sharing for support with your finances                 |
| Archive companies   | Storage of information   |
| Local authorities   | Support information for services provided                              |
| Family/ Circle of Support   | Support information for services provided                              |
| Police  | For vital interests/decision making and any legal requirements         |
| Investing for Good  | Social Impact Reporting  |
| Research facilities   | Research work  |
| Utilities companies   | As part of our work in supporting you                                  |
| Social media (e.g. Twitter, LinkedIn, Facebook)   | Public channels for sharing news about Thera and stories               |
| IT service providers  | Companies which support Thera Group IT systems                         |

|  |  |
|--|--|
| Data Recovery Site provider (Providers of systems where they are hosted by the provider and not located in the company server rooms. Your personal information is contained within the systems and checks are made to ensure the provider has very limited access, and only for the purpose of troubleshooting). | Assist with Business Continuity and Disaster Recovery                              |
| Online support planning provider   | Maintains online support planning system   |
| PR and Marketing companies   | Help in production of marketing materials  |
| Other Suppliers (eg. Royal Mail)   | Enables Thera to provide our services to you or who provide services on our behalf |
| Housing Associations/Landlords   | Support with your tenancy agreement  |
| Auditors/Solicitors  | Help with all regulatory audit and legal requirements for the Thera Group          |

### **Young people**

| <b>Recipients of your data</b> | <b>Purpose for sharing</b>   |
|--------------------------------|--|
| Thera Group of Companies       | Information relating to the support of the individual as well as next of kin information |

### **Family and Friends (including professional friends, e.g. care managers)**

| <b>Recipients of your data</b> | <b>Purpose for sharing</b>   |
|--------------------------------|--|
| Thera Group of Companies       | Information relating to the support of the individual as well as next of kin information |

### **Staff, applicants and agency workers**

| <b>Recipients of your data</b>  | <b>Purpose for sharing</b>                     |
|---|--|
| Potential employers   | Providing references                           |
| Recruitment Agencies/ Consultants   | Additional staff support requirements          |
| Government bodies, e.g. Office for National Statistics (OFNS), Disclosure and Barring Service (DBS) | Regulatory processing of statutory information |

|  |  |
|--|--|
| Barclays.net and other banking systems         | Pay details  |
| Other Care Providers                           | Information for TUPE transfers   |
| Other Thera Group companies                    | Meeting minutes  |
| Archive companies                              | Secure storage of information  |
| Police   | Criminal proceedings/convictions   |
| HR Software Provider                           | Processing salaries, expenses, day-to-day HR processes   |
| The Charity Commission/ OSCR (Scotland)        | Completing annual returns (Directors only)   |
| Companies House                                | Directors' filings, completing annual confirmation statements  |
| IT Providers                                   | Company which runs Thera IT systems  |
| Data Recovery Providers                        | Assist with Business Continuity and Disaster Recovery  |
| PR and Marketing companies                     | Help in production of marketing materials  |
| Other Suppliers (e.g. Royal Mail)              | Enables Thera to provide our services to you or who provide services on our behalf   |
| Auditors/Solicitors                            | Help with all regulatory audit and legal requirements for the Group  |
| Local authority Community Support care systems | Local authorities are beginning to develop care systems to enable secure sharing of information regarding the people we support. You may need to be added as a user to update these systems. |
| HR staff Rostering system provider             | Staff rostering  |
| Stationery suppliers                           | Staff stationery suppliers   |
| Vehicle management system                      | Driver and vehicle management software   |

| <b><u>Volunteers</u></b>       |   |
|--------------------------------|---|
| <b>Recipients of your data</b> | <b>Purpose for sharing</b>                    |
| Potential employers            | Providing references                          |
| Archive companies              | Secure storage of information                 |
| HR software provider           | Processing of expenses payments               |
| IT service providers           | Company which supports Thera Group IT systems |

|                                  |  |
|----------------------------------|--|
| Other suppliers (eg. Royal Mail) | Enables Thera Group to provide our services to you or who provide services on our behalf |
| Stationery suppliers             | Staff stationery suppliers   |
| Vehicle management system        | Driver and vehicle management software   |

| <b><u>Donors</u></b>                                |   |
|---|---|
| <b>Recipients of your data</b>                      | <b>Purpose for sharing</b>  |
| Payment providers                                   | To process your donation  |
| Barclays Bank including Barclays.net online banking | Providing managed client accounts   |
| Auditors/Solicitors                                 | Help with all regulatory audit and legal requirements for the Thera Group |

## How long we keep your personal data

We will keep your personal data in line with our internal policies and procedures, applicable laws and for no longer than is necessary to fulfil the purpose(s) we collected it for.

When deciding how long to retain personal data we will consider:

- The purpose(s) for which it was collected and whether we can achieve that purpose through other means,
- Whether the use is limited to a specific project timeframe,
- Any legal (e.g., tax law often requires data to be retained for 6 plus current tax years) or best practice requirements for data retention that may apply,
- The amount, nature and sensitivity of the personal data involved,
- The risk of harm from unauthorised use or disclosure of your personal information, and
- Our understanding of the expectations of data subjects.

Consequently, retention periods will vary. We have included retention periods [above](#), depending upon your relationship with us, but if you require further details on specific retention periods, please [contact our DPO](#).

# Your rights

Information on the rights available to you under data protection law is set out below. In most circumstances, we have one month to respond to you but if we require more time, we will let you know why. In very limited circumstances, we may charge a fee.

If you ask another person to help you exercise your data protection rights, we must be satisfied that the third party making the request is entitled to act on your behalf, and we will ask for evidence of this. For example, by requesting a written authority, signed by you, stating that you give the third-party permission to make a request on their behalf.

## Identity verification

We may need to verify your identity before we respond to a request to exercise your data protection rights. This is to ensure that we only disclose personal data to the right person. We will let you know if we need additional information from you and will pause the statutory response timeframe until the information is received.

Please note we do not use any automated decision-making or profiling (as defined in data protection law).

| <b>YOUR RIGHT</b>             | <b>DETAILS</b>   |
|-------------------------------|--|
| <b>Right to be informed</b>   | We have a legal obligation to provide you with concise, transparent, intelligible, and easily accessible information about your personal data and our use of it. We have written this privacy notice to do just that, but if you have any questions or require more specific information please contact <a href="mailto:data.protection@thera.co.uk">data.protection@thera.co.uk</a>   |
| <b>Right of access</b>        | You have the right to ask us for copies of your personal data. This right always applies. There are some exemptions, which means you may not always receive all the information. When you request this request, it is known as a data subject access request (DSAR). In most cases, this will be free of charge; however, in some limited circumstances, for example repeated requests for further copies, we may apply an administration fee. |
| <b>Right to rectification</b> | You have the right to ask us to rectify personal data you think is inaccurate. You also have the right to ask us to complete information you think is incomplete. This right always applies.   |

**Right to erasure**

You have the right to ask us to erase your personal data in certain circumstances. We have the right to refuse to comply with a request for erasure if we are processing the relevant personal data for one of the following reasons:

- To comply with a legal obligation.
- To perform a task in the public interest or exercise official authority.
- For archiving purposes in the public interest, scientific research, historical research or statistical purposes.
- For the exercise or defence of legal claims.

**Right to restriction of processing**

You may ask us to stop processing your personal data. We will still hold the data but will not process it any further. This right is an alternative to the right to erasure. If one of the following conditions applies, the right to restrict processing applies:

- The accuracy of the personal data is contested.
- Processing of the personal data is unlawful.
- We no longer need the personal data for processing, but the personal data is required for part of a legal process.
- The right to object has been exercised and processing is restricted pending a decision on the status of the processing.

**Right to object to processing**

You have the right to object to processing in certain circumstances. You can object if the processing is for a task carried out in the public interest, the exercise of official authority vested in you, or your legitimate interests (or those of a third party).

You have an absolute right to stop your personal data being used for direct marketing purposes. Where we send you electronic marketing you can unsubscribe at any time by clicking the unsubscribe link in the emails or by contacting us at [communications@thera.co.uk](mailto:communications@thera.co.uk). For post marketing, please contact us at [communications@thera.co.uk](mailto:communications@thera.co.uk). Please note that it may take up to 30 days for your request to opt out of marketing to be fully processed in our systems and we kindly ask that you disregard any marketing you receive from us during that time.

**Right to data portability**

This right only applies if we are processing personal data based on your consent or for the performance of a contract and the processing is automated.

Where we rely upon your consent for processing your personal data, you may withdraw that consent at any time by contacting us as follows – [dataprotection@thera.co.uk](mailto:dataprotection@thera.co.uk). Please note this will not affect the lawfulness of the processing before the point at which you withdraw your consent nor, when applicable law allows, will it affect the processing of your personal information on the basis of any other lawful ground other than consent.

## Transferring your personal data overseas

Your personal data may be transferred to, and processed in, countries outside the United Kingdom where we engage third-party suppliers to provide services on our behalf. For example, we use third-party software providers such as Microsoft, who may process personal data outside the UK in delivering their services.

Our systems primarily store personal data within the UK and the European Economic Area (EEA). However, in limited circumstances, personal data may also be transferred to and processed in the United States and other countries outside the UK.

Whenever we transfer personal data outside the UK, we ensure that the transfer complies with applicable data protection laws, including Chapter V of the UK GDPR.

Where personal data is transferred to countries that have been recognised as providing an adequate level of protection under UK adequacy regulations, we rely on those adequacy decisions.

Where a country does not benefit from a UK adequacy decision, we implement appropriate safeguards to protect your personal data. These safeguards typically include:

- the UK International Data Transfer Agreement (IDTA); or
- the UK Addendum to the European Commission's Standard Contractual Clauses (SCCs).

In addition, we carry out appropriate due diligence and transfer risk assessments to ensure that your personal data continues to be protected to a standard equivalent to that required under UK data protection law.

From time to time, we may transfer personal data to other countries outside the UK that are not specifically described in this privacy notice. Where this occurs, we will ensure that appropriate safeguards are in place and will update this privacy notice or otherwise inform you, where required, before such transfers take place.

You have the right to request further information about the safeguards we have put in place for international transfers, including obtaining a copy of those safeguards where relevant.

If you would like more information about how we protect your personal data when it is transferred overseas, please contact us using the details set out in this privacy notice.

## Use of Artificial Intelligence (AI)

As part of our ongoing commitment to efficiency and innovation, we may use Artificial Intelligence (AI) systems to support the delivery of our services. These systems may assist with tasks such as data analysis, communication drafting, or customer support. The Group uses Copilot (an AI system) as the only form of AI data gathering.

All AI tools we use are subject to robust oversight and are deployed in accordance with applicable data protection laws. We ensure that any personal data processed by AI is handled lawfully, fairly, and transparently, with appropriate safeguards in place.

While we may use AI tools to assist with drafting or analysis, these systems do not make decisions that produce legal or significant effects for individuals without human involvement. All decisions about the people we support, staff, volunteers, or donors are made by people.

Where AI is used in a way that materially influences decisions or communications affecting you, we retain human oversight and are happy to explain how the technology supports our work. If you have any questions or concerns about our use of AI, you can contact our data protection team.

## The National Data Opt-Out

We comply with the NHS National Data Opt-Out policy. This means you can choose not to have your confidential patient information used for purposes beyond your individual care, such as research and planning.

We ensure that everyone we support is informed of this right and given the opportunity to opt out. For more information, visit <https://www.nhs.uk/your-nhs-datamatters>.

## Questions or concerns

If you have any concerns about our handling of your personal information or believe your privacy rights have been infringed, you have the right to make a complaint. We are committed to resolving privacy-related complaints promptly and effectively.

We encourage you to [contact us directly](#) so that we can address any issues promptly. However, if you are not satisfied with our response, you may also have the right to file a complaint directly with the Information Commissioner's Office (ICO) and/or to [data.protection@thera.co.uk](mailto:data.protection@thera.co.uk) where the complaint will be handled under our company Making a Comment or Complaint policy.

The ICO's contact details are:

Online: [Make a complaint | ICO](#)

By telephone: 0303 123 1113

## Cookies and similar tracking technologies

Each time you interact with our website we may, depending on the consent provided, automatically collect personal data, including technical data about your device, your browsing actions and patterns, as well as content and usage data. We collect this data using cookies, server logs and other similar technologies like pixels, tags and other identifiers. You can read more about how we use cookies and similar tracking technologies in our [Cookie Policy](#).

## Changes to this privacy notice

We will post any changes we make to this privacy notice on this page and indicate on the website homepage that we have updated it. If the changes materially alter how we use or treat your personal data, we will notify you through a notice on the website. Please check back frequently to see any updates or changes to this privacy notice.

This privacy notice was last updated in April 2026.