# CMA Client Privacy Notice

**About us**

Community Money Advice (CMA) Centres provide confidential, free, face-to-face money advice. CMA’s network has two kinds of debt advice service:

DEBT ADVICE CENTRE: All face to face support; budget training and regulated debt advice is undertaken by centre staff

CONNECT CENTRE: All face to face support and budget training is undertaken by centre staff; regulated debt advice is referred to debt advisers at CMA’s central hub.

Debt Advice Centres (not Connect Centres)are authorised and regulated by the Financial Conduct Authority (FCA). Debt Advice and Connect centres are both committed to protecting and respecting your privacy and comply with the requirements of the General Data Protection Regulation (GDPR).

This privacy notice explains how CMA Centres collect, use and store your personal data. It sets out the basis on which any personal information provided will be processed.

The person responsible for Data Control within CMA is Heather Keates

email: info@communitymoneyadvice.com,

CMA C/O Illuminate, 18 Wyle Cop, Shrewsbury, Shropshire SY1 1XB

Telephone: 01743 341929

**What is personal data?**

Personal data is defined as any information relating to an identified or identifiable natural person (the ‘data subject’). The processing of personal data is governed by the GDPR.

**The lawful basis for processing your personal data**

All organisations need a lawful basis to collect and use personal data. In accordance with GDPR, we can legally process your personal information because you have given us your consent to collect, process and store your personal data by signing a contract with us.

**Processing your personal data**

CMA centres collect personal data in order to be able to offer the best advice for your circumstances. They will only use any personal information you have chosen to provide to us, for the purpose that you provided it for. They will also sometimes collect additional information from third parties, with your consent, in order to provide the best advice for your circumstances. For example, credit reference agencies, creditors and debt recovery agencies.

They will not use your personal data for any other purpose without your consent or disclose your personal data to any third parties without your consent, except where they are required to do so by law. CMA or our centres will never sell or receive payment for licensing or disclosing your personal information.

Statistics gathered to monitor the service for the purposes of identifying any policy issues and to support funding applications will be anonymised to prevent identification of individual users.

**Data protection principles**

CMA and their centres comply with all obligations under the GDPR by keeping personal data up to date; by storing and destroying it securely; by not collecting or retaining excessive amounts of data; by protecting personal data from loss, misuse, unauthorised access and disclosure and by ensuring that appropriate measures are in place to protect personal data. You can find more information about how we protect and store your personal data by asking for copies of the Security Policy and File Retention and Destruction Policy.

**Our purpose for processing your personal data including special category data**

In order to comply with the Financial Conduct Authority’s Consumer Credit Sourcebook Regulations, centres are required to obtain all relevant data in order to be able to offer you the best advice based on your circumstances. This may include processing Special Category Data such as health information or other data of a sensitive nature.

They will only collect Special Category Data if there is a clear reason for doing so, such as where they need this information to ensure that you are provided with appropriate advice or support. CMA centres will only use sensitive information for the purposes for which it is provided.

**Your data rights**

Under data protection law, you have rights we need to make you aware of. The rights available to you depend on the reason for processing your information.

**a) Your right of access**

You have the right to ask for copies of your personal information. There are some exemptions, which mean you may not always receive all the information we process. You can read more about this on the ICO website: <https://ico.org.uk/your-data-matters/your-right-of-access/>

**b) Your right to get your data corrected**

You have the right to ask for any information held about you to be corrected if you think it is inaccurate. This is also known as the ‘right to rectification.’ You also have the right to ask for information to be completed if you think it is incomplete. You can read more about this right here: <https://ico.org.uk/your-data-matters/your-right-to-get-your-data-corrected/>

**c) Your right to erasure**

You have the right to ask for your personal information to be erased in certain circumstances. This is known as the right to erasure. This is also known as the ‘right to be forgotten’. You can read more about this right here: <https://ico.org.uk/your-data-matters/your-right-to-get-your-data-deleted/>

**d) Your right to restriction of processing**

You have the right to ask for the processing of your information to be restricted in certain circumstances. You can read more about this right here: <https://ico.org.uk/your-data-matters/your-right-to-limit-how-organisations-use-your-data/>

**e) Your right to object to processing**

You have an absolute right to stop the processing of your personal data for direct marketing purposes.  However, centres may still be able to legitimately continue using your data for other purposes. You can read more about this right here: <https://ico.org.uk/your-data-matters/the-right-to-object-to-the-use-of-your-data/>

**f) Your right to data portability**

You have the right to ask that any information you give be transferred to another organisation, or be given it to you. This right to only applies to electronically held data that you have provided and is being processed with your consent. You can read more about this right here: <https://ico.org.uk/your-data-matters/your-right-to-data-portability/>

**Your right to withdraw consent**

When processing personal information based on your consent, you have the right to withdraw that consent at any time by contacting the Data Controller, verbally or in writing.

**Your right to complain**

You have the right to be confident that CMA and their centres will handle your personal information responsibly and in line with good practice. If you have concerns about the way we are handling your information, please contact our Data Controller Heather Keates or the local CMA Centre data Controller in the first instance as we have a dedicated complaints procedure.

If you are unhappy with how your complaint has been handled by us or if we have failed to resolve your information rights concern, you can raise the matter with the Information Commissioner’s Office by calling them on 0303 123 1113 or via email <https://ico.org.uk/global/contact-us/email/> or by writing to the ICO, Wycliffe House, Water Lane, Wilmslow, Cheshire. SK9 5AF.

**Exercising your rights**

You will not have to pay a fee to access your personal information (or to exercise any of the other rights). However, a CMA centre may charge a reasonable fee or refuse a request if access is considered to be ‘manifestly unfounded or excessive’. You will be informed of this in writing, where this is the case.

The response time for a request is one month although in certain circumstances extra time may be needed to consider your request and can take up to an extra two months. If extra time is required, you will be informed within one month that more time is needed and given a reason why.

**Retention periods for personal data**

CMA and CMA centres remove personal data from our systems in line with the data retention periods quoted in their File Retention & Destruction policy The length of time each category of data will be retained will vary on how long we need to process it, the reason it is collected, and in line with any statutory requirements. After this point the data will either be deleted or rendered anonymous.

**Sharing your information with third parties**

Your personal data will be treated as strictly confidential and will only be shared with staff/volunteers and members of the CMA Centre and central CMA team who are responsible for reviewing client files for audit purposes. Your personal data will only be sent to third parties with your consent. The only exception to this is if information is requested for legal reasons. CMA and CMA centres will never share your information with third parties for the purposes of direct marketing.

**Changes to this Privacy Notice**

CMA reserves the right to review the way we process your personal information and will update this Privacy Notice if there are any changes.