

CARF Privacy Notice

Citizens Advice and Rights Fife (also referred to 'CARF', 'the charity', 'we', 'our', or 'us') is the Data Controller for any personal data we process about you for the purposes set out in this Privacy Notice. Our ICO registration number is Z5510339.

This notice outlines what personal data CARF collects and processes about you when seeking advice and assistance from CARF. This notice does not cover personal data we process about our staff, workers, trustees, volunteers, supporters, or donors. Please read this notice carefully to understand how we process and look after your personal data.

CARF is a member of the Scottish Association of Citizens Advice Bureaux (SACAB – operating name Citizens Advice Scotland), a network of 59 individual Citizens Advice Bureau (CABs). CARF uses a case management system called CASTLE. We are a [Joint Controller with Citizens Advice Scotland](#) (CAS) for the data held on this system.

1. Our Data Processing

1.1. Providing Advice and Assistance

CARF is an independent charity (SC027015) that provides free, confidential, expert advice and assistance to help you resolve your problems. We deliver a holistic service and our data processing may vary depending on the support we are providing. We only use the personal data we need. Most data we process will have been provided by you during your discussions with our advisors. On occasion referrals are made to CARF from other organisations. They may share your data with us to help us provide you with advice and support. They should make you aware when this happens.

CARF processes personal data to keep records of the advice and support offered. This is to provide an effective and efficient service to you as well as for our insurance purposes. This may include

- Name
- Address
- Email
- Phone number
- Financial data
- Criminal convictions data

You may also provide information such as your ethnicity, mental and physical health, political and philosophical beliefs, religion, trade union membership, genetics, sexual life or gender. This is called 'special category data' and we will only use this type of personal data where it is necessary for us to deliver services to you and where we are permitted by law.

If you do not want us to record and use your information, we can help you as best we can, but advice will be limited and general rather than specific to your circumstances.

1.2. Research and Advocacy

We also collect, use and share aggregated data such as statistical or demographic data as part of our research and advocacy work to tackle wider issues in society that affect citizens in Scotland. Aggregated data could be derived from your personal data but is not considered personal data in law as this will not directly or indirectly reveal your identity. However, if we combine or connect aggregated data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this Privacy Notice. Where possible, data will be anonymised.

You can see examples of how data is used for [research and advocacy work on the Citizens Advice Scotland website](#).

1.3. Improvement of Services

We may also use personal data to help improve our services.

CivTech

CARF in partnership with Citizens Advice Scotland participates in the [Scottish Government CivTech programme](#), looking at innovative solutions to help solve problems, including using tools such as Machine Learning and AI. We may ask you to participate in this programme and, if you agree, we aim to anonymise any personal data shared as part of this work, but where this is not possible, we will ask for your consent.

Surveys and Customer Satisfaction

We may conduct follow-up surveys and customer satisfaction monitoring with you to help assess and improve our services.

Recording and Monitoring Calls

We may record and monitor calls for the purposes of managing complaints and improving our services.

Cookies

We also use cookies on our website. This is to provide data on who uses our website and for what purpose.

1.4. Promoting our Services

We may send you information to promote our services, ideals or aims, or send you our newsletters and similar updates.

1.5. Children's Data

The CARF website is not intended for children and we do not knowingly collect data relating to children from our website. However, we may collect information relating to children from you when providing advice and assistance. We will only collect the minimum amount of data necessary for providing you with the relevant support.

1.6. Security and Crime Prevention

Images of you may be taken by CCTV systems when you attend our premises. We may record details of incidents for the safety of staff and volunteers.

2. Lawful bases we rely on to process your information

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances where:

- It is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- You have given us your consent.
- Processing is necessary for us to perform a public task carried out in the public interest.
- There is a legal obligation for us to do so

When we process special category personal data, in addition to the above legal bases, the additional bases for processing that we rely upon is:

- explicit consent
- where there is a substantial public interest for us to do so

Please see Appendix 1 for further information on the lawful bases we may rely upon to process your personal data.

3. Withdrawing Consent

If we rely upon your consent to process your personal data, you may request to withdraw consent at any time by contacting us at which point we shall stop processing your personal data in that way. Please note that this does not affect the legality of our processing up to the date of your withdrawal of consent.

4. Sharing Data

We may need to share your data in the following situations:

- When you give us authority to work with organisations on your behalf
- When referring between support organisations
- With members of the Scottish Association of Citizens Advice Bureaux (SACAB)
- With sub-processors delivering services for CARF (e.g. technology providers)
- With our insurers if you submit a complaint
- With funders as part of research and advocacy work

If we do need to share personal data we will have appropriate controls and processes in place through contracts and/or data sharing agreements. All data sharing will comply with data protection laws. Where possible we will anonymise data.

We may need to share your personal data in accordance with law e.g. with a court order, other authorities, or any regulatory requirement to which the charity is subject.

In exceptional circumstances where there is a high risk of harm to an individual, person-identifiable confidential information may be shared with third parties. We have strict Safeguarding procedures in place for when this may occur.

5. Transfers to 3rd countries

We may transfer personal information outside the UK.

Some of our service providers process personal data we give them outside of the UK. Where this happens and the recipient country is not deemed adequate by the UK Government, then we will put in place additional measures to protect your personal data, such as contracts approved for use by the Information Commissioner's Office, and any necessary supplementary measures.

6. Retention

We will not keep your personal data for any longer than is reasonably necessary. We have a record retention schedule that sets out the periods for retaining and reviewing all information that we hold. All data will be securely disposed of once it is no longer needed.

Most client information is retained for 7 years, however under certain circumstances we are legally required to retain personal data for longer, for example if you have entered into a debt remedy your information is retained for 7 years plus the length of the debt remedy. Calls may be recorded for monitoring purposes and are deleted after 100 days. Voice transcription data will be deleted after 28 days although information collected in your case record will be kept longer than this.

7. Project Privacy Notices

Where CARF is involved in delivering a national project locally, there may be an additional Privacy Notice for that project. Where you are a client of a project we will seek to refer you to the Privacy Notice to be read along with this one. These Privacy Notices are linked below:

[Patient Advice and Support Service \(PASS\)](#)

8. Your Data Rights

Under data protection law, [you have certain rights when organisations process your personal information](#). The rights available to you depend on our reason for processing.

- Right of access to the data we process about you
- Right to rectification of any data we process that may be incorrect
- Right to erasure of data we process about you
- Right to restrict processing of data we process about you
- Right to object to CARF processing your data
- Right to data portability
- Right not to be subject to automated decision-making and profiling

9. Data Controller Contact Details

If you have any questions or queries, or wish to exercise your data rights you can contact CARF at DataProtection@carfonline.org.uk. If you have queries regarding CASTLE, our case management system, you should contact CARF in the first instance, however your query may be passed to CAS as a Joint Controller of the system. You can find information on CAS's data processing on [the CAS Privacy Policy](#).

10. Supervisory Authority Contact Details

You have the right to lodge a complaint to the Information Commissioner about the processing of your data.

Their contact details are: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow Cheshire, SK9 5AF. Tel: 0303 123 1113. The website is at: <https://ICO.org.uk>

11. Changes

We reserve the right to amend this privacy notice from time to time.

Last Updated: April 2023.

APPENDIX 1

Personal Data is collected in several different ways depending on your interaction with us. The table below sets out what personal data we process about you, where we get it from, why we use it, our legal basis and whom we share it with.

Purpose	Personal Data	Where do we get it from?	Legal Basis	Will we share it other than as set out above ?
To respond to enquiries (online and otherwise) and to provide or facilitate you with our service, advice and/or support.	Name, email address, any information you provide to us.	When you submit an enquiry on our website, use our online forms, Chatbot (virtual assistant), email, text, telephone, post or when we meet you face to face.	Legitimate Interest – it is in our legitimate interest to respond to enquiries, requests and information received to ensure we provide you with the relevant support.	
To provide you with CAS advice session communications by email or text.	Name, email and telephone number.	From you.	Legitimate Interest	
Images of you may be taken by CCTV systems when you have attended some of our premises, such as at door entry points, which are used by members of the public.	Camera footage.	Through our CCTV devices on site.	Legitimate Interest – it is in our legitimate interest to capture CCTV footage at our premises for security purposes.	Only where required for the purposes of detecting or preventing crime.

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Purpose	Personal Data	Where do we get it from?	Legal Basis	Will we share it other than as set out above ?
To market our services, ideals or aims with a view to converting inquiries, send you our newsletters and similar updates, and marketing activity into donations for our charity.	Name, email address, telephone, address.	From you.	<p>Our legal basis is that it is in our legitimate interest to market our services, ideals or aims.</p> <p>We may also rely on consent for certain marketing activity and where this is the case, we will obtain this from you separately.</p>	No.
To take part in the CivTech challenges and/or improve or provide additional service benefits or solutions through technology developed via the CivTech Challenge .	Name, email address, information you provide to us through using our services, including data held within CAS's case management system.	From you.	Our legitimate interests of improving our service and keeping it up to date with current technology in order to provide offer high quality advice and access to our help.	We may share this data with organisations that take part in the CivTech Challenge and/or Citizen's Advice Bureaus for the purpose of improving our service and keeping it up to date with current technology in order to provide offer high quality advice and access to our help and for the purpose of taking part in the CivTech challenge.

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Purpose	Personal Data	Where do we get it from?	Legal Basis	Will we share it other than as set out above ?
Research and advocacy.	Aggregated data derived from datasets which include your personal data. This information is usually not capable of identifying you in this format.	From you.	Legitimate interest.	CAS and other partner organisations we may collaborate with for research purposes. The data we share will be anonymous.
To set cookies on our website.	Data about your use of our website.	From you.	For essential cookies, it is in our legitimate interest to use these to operate the website. For non-essential cookies, we rely on your consent.	Google Analytics.
To keep records of support provided to you	Data on our case management system.	From you and other bureau's.	Our legal basis is that it is in our legitimate interest to manage our systems.	With CAS, who are a joint controller of your personal data held in our case management system.
To record and monitor calls.	Call recordings.	From you.	Our legal basis is that it is in our legitimate interest to ensure our calls are of good quality and public task to record calls where we are required to record calls relating to specific services, such as our Help to Claim service.	We may share this data in limited circumstance where we need to defend a complaint and legal claim and in respect to the Help to Claim service we may be required to share the information with partners we work with including Citizen's Advice Bureaus, Citizens Advice

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Purpose	Personal Data	Where do we get it from?	Legal Basis	Will we share it other than as set out above ?
				England and Wales and the Department for Work and Pensions.
Consent and responses for Customer Satisfaction Survey or any other surveys.	Name, email address, telephone, address.	From you.	Your consent.	No.
<p>To provide you with specific advice in relation to:</p> <ul style="list-style-type: none"> • Welfare rights • Consumer matters • Money and Debt • Work and Employment • Housing and homelessness • Immigration • Health Services 	<p>Always:</p> <ul style="list-style-type: none"> - Contact details <p>May be processed depending on advice:</p> <ul style="list-style-type: none"> - Financial circumstances - Family circumstances - Employment circumstances - Housing circumstances - Nationality information 	From you.	<p>We may rely on a number of lawful bases depending on the service we provide you:</p> <p>Our Article 6 lawful bases are:</p> <ul style="list-style-type: none"> • Legitimate interest • Consent • Public task <p>Our Article 9 lawful bases are:</p> <ul style="list-style-type: none"> • Where processing is necessary to carry out a task in the public interest, for example where we are providing a publicly funded service 	<ul style="list-style-type: none"> • When you give us authority to work with organisations on your behalf • When referring between support organisations • With members of the Scottish Association of Citizens Advice Bureaux (SACAB) • With sub-processors delivering services for CARF (e.g. technology providers) • With our insurers if you submit a complaint

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Purpose	Personal Data	Where do we get it from?	Legal Basis	Will we share it other than as set out above ?
	<ul style="list-style-type: none"> - Health information - Medical records - Pension information - Criminal victim information - Criminal record information 		<ul style="list-style-type: none"> • Explicit Consent <p>Please note that we will not always require your consent to process your personal data where another lawful basis applies.</p>	<ul style="list-style-type: none"> • With funders as part of research and advocacy work