

PRIVACY POLICY

Croydon Hearing is committed to ensuring that your privacy is protected.

This notice is intended to let you know how and why we use the data you provide to us. You don't need to do anything – but please read this notice carefully. We may update this notice from time to time, so please check it regularly.

1. Who we are

Croydon Hearing Resource Centre is a registered charity number 1081376 and a company limited by guarantee in England number 4015700. Our registered office: Unit 12B Capital Business Centre, 22 Carlton Road, South Croydon, CR2 0BS

Our website: <https://www.croydonhearing.org.uk>

We are committed to protecting your privacy and will only use personal data that we collect in line with all applicable laws, including the current UK data protection legislation 2025, which amends and supplements the UK GDPR and the Data Protection Act 2018.

2. What data do we collect about you?

Personal data we collect may include one or more of the following:

- Client details, such as name, address, telephone number, email address
- Client GP details (plus other involved health care professionals)
- Client representative details, such as name, address, telephone number and email address

In addition, we may need to contact other agencies for relevant health or social care information for the benefit of our clients' care.

3. How do we use the data we collect about you?

We use your personal data for several purposes including the following:

- Information relating to diagnosis, treatment and care could be shared across multi-disciplinary teams to ensure all healthcare professionals are updated for continuing care.
- Advising patient representatives (keeping in touch).
- If appropriate, information will be shared with external healthcare professionals such as GP's, Hospitals and other involved health care professionals.

We are allowed to process your data for **legitimate interest** for one or more of these reasons:

- We have consent to use your information for continuing health care and continuing advice and support.
- It is necessary for compliance with a legal obligation to which we are subject (for example a change in the law).
- We have a legitimate interest to do so – for example, where consent is absent and we need to provide immediate care.
- It is in the public interest to do so (for example, a notification of infectious diseases (NOID) that need to be reported to the Local Authority health protection team).
- Data disclosure may be required by law, for example to government bodies and law enforcement agencies.

Rest assured, we never share, sell, swap or rent your data to third parties for marketing purposes.

4. How do we protect and keep your data?

We have the latest security procedures, rules and technical measures to protect your data. Your data will be kept in a secure environment with access restricted on a need to know basis.

We don't keep your data for longer than is necessary for the purpose for which it is obtained.

Personal data will not be transferred to a country or territory outside the European Economic Area unless there is a specific operational or medical reason to do so, in which circumstance we are obliged to ensure that the Country or Territory concerned ensures an equal level of cyber security/protection and confidentiality procedures (General Data Protection Regulation) for your rights and freedoms, in relation to the processing and storage of personal data.

We never use clinical data for educational or research purposes without encrypting or anonymising and rest assured no recognisable personal information is released.

We are committed to protecting your privacy and will only use personal data that we collect lawfully, in line with all current applicable data protection laws and regulations. Our compliance is mandatory and governed by the Information Commissioners Office (details on request).

To monitor the protection of data we have a Data Protection Officer who is responsible for all matters concerning data and its securities.

5. Cookie policy (our website)

Embedded content from other websites:

Articles on this site may include embedded content (e.g. videos, images, articles, etc.). Embedded content from other websites behaves in the exact same way as if the visitor has visited the other website.

These websites may collect data about you, use cookies, embed additional third-party tracking, and monitor your interaction with that embedded content, including tracking your interaction with the embedded content if you have an account and are logged in to that website.

Information captured by comments

Our website does not make use of a comments section.

Media

Our website does not allow visitors to the site to upload media files.

Contact Form

Our website does not support a contact form.

Cookies

We use cookies on our website to collect information about your visit to our website, including the pages you view, the links that you click on and other actions taken within our website. We also collect certain standard information that your browser sends to every website you visit, such as your IP address, browser type and language, access times and referring Web site addresses. This data about your site visit is not linked to any other information we hold about you.

Analytics:

We use Jetpack to enhance the features of this website, such as collecting visitor analytics. You can find their cookie policy here: <https://automattic.com/cookies/> and their privacy policy here: <https://automattic.com/privacy-notice/>

Who we share your virtual data with

We do not share site data with any third party providers.

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Charity for hearing loss

How we protect your virtual data:

Our website uses encryption to encrypt all data passed between your computer and our website.

Access to the servers used by our website, hosted by IONOS, are protected through Two-Factor Authentication and monthly password changes.

Any contact (e.g. telephone or email) with our web hosting company IONOS, requires PIN authentication.

What data breach procedures we have in place?

In the event of a data breach being detected on our website by our web hosting company IONOS, we will contact and advise the ICO with the details within 24 hours.

We also monitor data breaches through a trusted outsourced IT provider, Qdos, who oversees our Microsoft 365 environment & office network. They actively monitor for threats using tools like Azure reporting, risky sign-in data, and risky user data. All company devices are protected with antivirus software and secured with MDM policies via Microsoft Intune. Additionally, all company hardware - laptops, routers, switches etc. - is regularly updated with the latest firmware and security patches. If a threat or breach is detected, immediate action is taken to contain it, followed by a thorough analysis to secure all systems and mitigate future risks.

What third parties we receive data from?

If you use our donation service, Enthuse, please see their company policy here:

<https://enthuse.com/security-and-data>

We are informed of your donation.

What automated decision making and/or profiling we do with user data

Our website does not make use of any automated decision making and/or profiling.

Social Media

When using websites owned by other organisations to communicate with us, such as Twitter or Facebook, then please consult their privacy policies/notices.

6. What rights do you have over your personal data?

Under the General Data Protection Regulation, you have the right to:

- Be kept informed.
- Ask for a copy of your personal data which we hold about you (known as a **subject access request**).
- Ask that we correct any personal data if it is found to be inaccurate or out of date.
- Ask that personal data is erased. (The right to be forgotten).
- Withdraw consent to the processing of your information at any time.
- Withdraw consent for Health Record sharing (with other health care professionals).
- Tell us that you do not wish any details to be discussed with your client representatives.
- Obtain and reuse personal data for your own purposes across different services, but only in electronic format.
- Lodge a complaint with Croydon Hearing Resource Centre or the UK regulator, The Information Commissioners Office (ICO details on request).

If there are any consequences to withdrawing consent or deletion of records, these will be fully explained and discussed.

To do any of the above or for further information please contact the Croydon Hearing Resource Centre Data Protection Officer, Peter Brown, using the following contact details:

The Data Protection Officer
Croydon Hearing Resource Centre
Unit 12B Capital Business Centre
22 Carlton Road,
South Croydon
CR2 0BS

Email: chrc@croydonhearing.org.uk

To help us keep your personal information accurate and up to date, please tell us about any changes by informing us:

The Managers
Croydon Hearing Resource Centre
Unit 12B Capital Business Centre
22 Carlton Road,
South Croydon
CR2 0BS

Telephone: 020 8686 0049

Email: hello@croydonhearing.org.uk

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Charity for hearing loss

Date this policy came into effect, approved by the Board of Trustees	Name: Peter Brown (Chair) Date: June 2018
Reviewed and approved by the Board of Trustees	Name: Mary Saunders & David Rose (Co-Chairs) Date: Aug 2025
Next Review as agreed by the Board of Trustees	Date: Aug 2026
Other related policies	
Relevant legislation	
Useful information	
Previous amendments	2019, 2020, 2022