



Privacy Policy

Coventry Independent Advice Service collects and use your personal information to help deal with your enquiries, to monitor and improve our services to you and to help deal with policy matters that might be affecting other people in Coventry or further afield.

We only ask for the information we need. We always let you decide what you are comfortable telling us, we will explain why we need it and we will always treat it as confidential.

When we record and use your personal information we promise to:

- ask only for the information we need
- only access it when we have a good reason
- protect it and make sure nobody has access to it who should not
- only share what is necessary and relevant, and only with your permission
- never to sell it to anyone

1. Who is responsible for keeping my personal information safe?

Coventry Independent Advice Service is responsible for keeping your personal information safe and making sure we comply with data protection law. This means we are the 'data controller' for your personal information.

We are a registered UK charity (1015216) and a company limited by guarantee in England and Wales (2761115). We are authorised and regulated by the Financial Conduct Authority (FRN: 628958).

Our registered address is Coventry Independent Advice Service, Oakwood House, Coventry CV1 2HL. You can contact us by email info@covadvice.org.uk or telephone 024 76521100.

2. What is Personal Information?

Personal Information is information relating to an identified or identifiable person. An identifiable person is one who can be identified, directly or indirectly, by reference to an identifier such as a name, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that person.

We do not consider personal information to include information that has been anonymised or aggregated so that it can no longer be used to identify a specific natural person, whether in combination with other information or otherwise.

We collect personal information from you when you use our Services, provide us information on a web form, update or add information to your files or when you otherwise correspond with us.

The provision of all personal information is voluntary but may be necessary to use our Services, particularly if you have asked us to undertake work on your behalf.

3. When you get advice from us

We'll get your permission by asking you to either sign a paper consent form or give agreement over the phone if you call us for advice or to make an appointment. Before we ask for your permission, we'll always explain how we use your information.

If you have been referred to us by another charity or service provider, they will send us your information using a referral form. They will always ask for your permission before sending us your information.

You have the right to withdraw your consent at any time.

Giving your consent

If you give us your consent you are saying that we can:

1. Record and use your personal information to help with your issue(s) and case.
2. Refer you to other advice providers and share your personal information with those advice providers so that they have initial information to help you further with your issue. Everything you told us will be treated confidentially by them.
3. To allow your case file to be assessed by an external agency for quality assurance purposes. Everything you told us will be treated confidentially by them.

You may opt out of any, or all, of these three areas of consent. This will not affect the service you are offered.

Asking you for consent

How you're asked for, and how you give, your consent depends on how you use our service:

- **In person**, our staff will ask you to give your consent in writing to us recording personal information about you.
- **On the telephone**, staff will ask you to give your consent to our service recording personal information about you if you are making an appointment to see one of our advisers.

4. What information we ask for

We'll only ask for information that's relevant to your enquiry. Depending on what you want help with, this might include:

- Identifying information such as your name, addresses, telephone numbers or email addresses when you seek advice from us and so we can keep in touch with you about your enquiry
- Personal information - for example about family, work, or financial circumstances
- Financial information (such as credit card or bank account numbers) in connection with the debt advice process.
- Information like your age, gender and ethnicity for statistical and monitoring purposes
- When you use our website, you may provide computer and connection information such as statistics on your page views and your IP address.

If you don't want to give us certain information, you don't have to. For example, if you want to stay anonymous we'll only record information about your problem and make sure you're not identified.

5. How we use your information

We use your personal information to provide and improve our Services, to contact you about your enquiry, to get feedback about our service, to investigate complaints and to provide you with customer service.

All advisers and staff accessing data have had data protection training to make sure your information is handled sensitively and securely.

Statistics and reporting

We use some information to create statistics and reports about who we are helping and the type of enquiries we receive. This information is always anonymised so that you cannot be identified.

We may share these reports with funders, regulators and publicly in our annual report, on social media, press releases and on our website. The statistics also inform our service strategy and policy work.

6. How we store your information

Whether you get advice face to face, over the phone or electronically, our adviser will log all your information, correspondence, and notes about your enquiry into our secure case management system (AdvicePro). AdvicePro data is securely stored in the UK within a robust, secure operations centre compliant with Information Security Code of Practice ISO27001, and automatically backed up daily.

Some of your information might also be kept within our secure email and IT systems.

7. When we might share your information with other organisations

With your permission, we might share your information with other organisations, so we can:

- Help to resolve your enquiry - for example, we may need to contact the Department for Work and Pensions in connection with your benefit claim or a Credit Reference Agency in relation to a debt issue we are helping you with
- Refer you to another organisation for more advice
- Monitor the quality of our services.

Organisations we share your data with must store and use your data in line with data protection law.

Sometimes we'll refer you to another organisation for specialist advice. We can help get you an appointment and we'll pass on the information you've already provided so you don't need to do it again.

We will ensure that if your information is shared with another organisation, this is only done with your permission. We will use the Information Commissioners Office (ICO) Data Sharing Code of Practice when we share information to ensure the other organisation treats your information with the same level of care as us.

Please be assured that we do not sell personal information to commercial organisations under any circumstances.

8. Personal information we collect using 'cookies' and similar technologies

When you browse our website, we may collect 'cookies' to help us understand more about how our site is used by visitors, and to develop and enhance our services to you.

A 'cookie' is a bit of information kept on your computer. It tells us things like what device you're using and what pages you click on. We may use cookies to track aspects of user visits, including your browser, geographic location and the use of the search facility on our website.

If you don't want to receive cookies, you can change settings in your web browser so that your browser tells you when cookies are sent to it or you can refuse cookies altogether. You can also delete cookies that have already been set.

If you wish to restrict or block web browser cookies, the Help function within your browser should tell you how.

9. Personal information collected from other sources

We may supplement the personal information we collect directly with information collected from third parties and add it to your file. For example, we may receive information from the Department for Work and Pensions in connection with your benefit claim or from a Credit Reference Agency in relation to a debt issue we are helping you with.

If you give us personal information about someone else, you must do so only with that person's authorisation. You should inform them how we collect, use, disclose, and retain their personal information according to our privacy notice.

10. Ways you can access, control, and correct your personal information

We respect your right to access, correct, request deletion or request restriction of our usage of your personal information as required by applicable law. We also take steps to ensure that the personal information we collect is accurate and up to date.

- You have the right to know what personal information we maintain about you
- We will provide you with a copy of your personal information in a structured, commonly used and machine-readable format on request
- If your personal information is incorrect or incomplete, you have the right to ask us to update it
- You have the right to object to our processing of your personal information
- You can also ask us to delete or restrict how we use your personal information, but this right is determined by applicable law and may impact your access to some of our Services

Please contact info@covadvice.org.uk or call 024 76521100 for more information.

If you're unhappy with how we hold your data, please contact us or you can follow our [complaints procedure](#).

11. How long we keep your personal information

We retain your personal information for as long as necessary to provide the Services you have requested, or for other essential purposes such as complying with our legal obligations, resolving disputes, and enforcing our policies.

We keep your information for 6 years. If your case has been subject to a serious complaint, insurance claim or other dispute we keep the data for 16 years.

12. When we might use your information without permission

As detailed above, we will usually get your permission to collect, use, store and share your information. On rare occasions, we may need to use or share your information without your permission. If we do, will always make sure there is a legal basis for it. This could include situations where we must use or share your information for the following reasons:

- **Legal obligation** - to comply with the law - for example, if a court orders us to share information or to defend our own legal rights if we are dealing with a complaint that we gave the wrong advice
- **Vital interests** - to protect someone's life - for example, sharing information with emergency services if you become unwell while seeking advice from us
- **Legitimate interests** - to carry out our aims and objectives as a charity - for example, to create anonymous case studies and statistics for our funders and other reporting purposes
- **Contractual reasons** - to carry out a contract we have with you - for example, if you are an employee we might need to store your bank details, so we can pay you