

Privacy Policy

Last updated	Aug 2023
Version	3.0

Definitions

Company	Means the Dialysis Freedom CIC trading as Dialysis Freedom Kidney Care UK a CIC company registered in England (07078098)
GDPR	Means the UK General Data Protection Regulation.
DPA	Means the Data Protection Act 2018.

Introduction

- a. The privacy and security of your personal information is extremely important to us. We want everyone who comes to us for support using our service, to feel confident and comfortable that any personal information they share with us will be looked after.
- b. This privacy policy explains how and why we use your personal data, to make sure you stay informed and can be confident about giving us your information.
- c. Dialysis Freedom Kidney Care UK needs to keep certain information on its users in order to carry out its day to day operations, to meet its objectives and to comply with legal obligations.
- d. We are committed to protecting individuals' personal information and privacy and ensuring any personal data is dealt with in line with the GDPR and the DPA. To comply with the law, personal information will be collected and used fairly, stored safely and not disclosed to any other person unlawfully.
- e. We'll never sell your personal data and will only share it with trusted third party organisations we work with when it's necessary to deliver our work, and the privacy and security of your data is assured. For example, for the purpose of your DAFB arrangements between holiday and home unit.
- f. If you have any questions in relation to this privacy policy or how we use the personal data you share with us, please contact our Data Protection Officer at info@dialysisfreedom.co.uk or write to us addressed to the Data Protection Officer, Dialysis Freedom Kidney Care UK, 2 Back Lane,

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Cossington, Leicester LE7 4UQ. You can also telephone us on 01509808668.

1. Who we are

- a. Dialysis Freedom Kidney Care UK is a non-for-profit company working in partnership with Kidney Care UK to provide a FREE UK holiday support service for Dialysis away from base in the UK, to UK patients and UK units. (company number 07078098).
- b. We are committed to improving access to DAFB for UK patients in the UK.

2. What personal data do we collect?

- a. We collect or update your personal information (any information which identifies you, or which can be identified as relating to you personally for example, name, address, phone number, email address), every time you get in touch with us by post, email, telephone, through our website, face to face and occasionally via social media.
- b. We will only collect, use and otherwise handle your personal data:
 - i. Where you have consented to this for specific, explicit and legitimate purposes, or for which we feel you would have a legitimate interest.
 - ii. Where this is necessary to fulfill legal obligations that apply to us
 - iii. Where it is necessary for our legitimate interests relating to running our daily operations, as long as, in each case, these interests are in line with applicable law and your legal rights and freedoms.
- c. **Sensitive Personal Data**
 - i. As part of our services, we may collect more sensitive personal data such as your health condition and social circumstances. This information is only collected for us to deliver the best possible service to you. This information is always stored securely and is not shared more widely within the company. We will not pass on your details to anyone else without your express permission except in exceptional circumstances, such as anyone reporting serious self-harm or posing a threat to others, or children contacting us about serious issues such as physical abuse or exploitation.
 - ii. Where you have given us your express consent that you are happy for us to share your story, then we may publish it on our website, or in social media or other media.
 - iii. Legal basis for processing: explicit consent

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d. Online Community and Social Media

- i. We may obtain your personal data through your use of social media such as Facebook, Twitter and other social channels, depending on your settings or the privacy policies of these social media and messaging services. To change your settings on these services, please refer to their privacy notices, which will tell you how to do this.
- ii. Legal basis for processing: consent

e. E-newsletter

- i. We use a third-party provider, Mailchimp, to deliver our monthly e-newsletters. We collect statistics around email opening and clicks using industry standard technologies. For more information, please see Mailchimp's privacy notice.
- ii. Legal basis for processing: explicit consent

f. Website and Cookies

- i. A cookie is a small file which asks permission to be placed on your computer's hard drive. Once you agree, the file is added, and the cookie helps analyse web traffic or identify you when you visit a particular site. Cookies allow web applications to respond to you as an individual. The web application can tailor its operations to your needs, likes and dislikes by gathering and remembering information about your preferences.
- ii. Overall, cookies help us provide you with a better website by enabling us to monitor which pages you find useful and which you do not. A cookie in no way gives us access to your computer or any information about you, other than the data you choose to share with us.
- iii. You can choose to accept or decline cookies. Most web browsers automatically accept cookies, but you can usually modify your browser setting to decline cookies if you prefer.
- iv. Legal basis for processing: legitimate interest

3. Children and young adult data

- a. When we know a client is under 18 we will always seek consent from the parent or guardian before storing and using personal information. In these circumstances any communications will be directed to the parent or guardian unless we have had their express permission to address any communication to the child or young adult.

- b. Legal basis for processing: explicit consent

4. How we use your personal data

- a. We use the personal information collected to help us achieve our company objectives to deliver our UK DAFB services to patients and their families, create great relationships and tailor our communications with our clients, and to meet our legal, statutory or regulatory obligations.
- b. This is for a number of purposes, including:
 - i. to provide you with services, products or information you have requested or which may be of interest to you;
 - ii. to fulfill our service of DAFB arrangements in the UK for you.
 - iii. to notify you of any changes to our services;
 - iv. to analyse and improve our work, services, activities, products or information (including our website) or for our internal records;
 - v. to use IP addresses and monitor website use to identify locations, block disruptive use, record website traffic or personalise the way information is presented to you;
 - vi. for administration purposes
 - vii. for fraud prevention, credit risk reduction or otherwise as required by law or regulation.
- c. We are committed to protecting individuals' personal information and privacy and ensuring any personal data is dealt with in line with the GDPR. To comply with the law, personal information will be collected and used fairly, stored safely and not disclosed to any other person unlawfully.
- d. We will only keep your information for as long as is reasonable and necessary for the relevant activity.
- e. Research
 - i. We may from time to time carry out research with our customers and staff to get feedback on their experience with us and their views on how we can improve our services. We use this feedback to improve the experiences that we offer and ensure we know what is relevant and interesting to you.
 - ii. If you choose to take part in research, we'll tell you when you start what data we will collect, why and how we'll use it. All the research we conduct is optional and you can choose not to take part. For some of our research we may ask you to provide sensitive personal data (e.g. ethnicity). You don't have to provide this data and we also provide a 'prefer not to say' option. We only use it at an aggregate level for reporting (e.g. equal opportunities monitoring), and your personal details remain anonymized for any reporting purposes.

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- iii. We may give some of your personal data (e.g. contact information) to a research agency who will carry out research on our behalf. This will only be done if we are sure your information will remain secure under a non-disclosure agreement or via selected agencies governed by a robust research code of conduct.

5. Keeping your information safe

- a. Your privacy is important to us, so we'll always keep your details secure. In order to prevent unauthorised access or disclosure, we have put in place suitable physical, electronic and managerial procedures to safeguard and secure the information we collect. Our cyber security policy is reviewed annually.
- b. We will never sell or share your personal information with third party organisations so that they can contact you for any marketing activity. Any processing of your information is carried out under our instruction, after a non-disclosure agreement has been signed and we have made sure they store the information securely, delete it when they no longer need it and never use it for any other purposes.

6. Updating your data and marketing preferences

- a. We'd love to stay in touch, but we don't want to out-stay our welcome - we want you to remain in control of your personal data.
- b. Under data protection law, you have rights including:
 - i. **Your right of access** - You have the right to ask us for copies of your personal information.
 - ii. **Your right to rectification** - You have the right to ask us to rectify personal information you think is inaccurate. You also have the right to ask us to complete information you think is incomplete.
 - iii. **Your right to erasure** - You have the right to ask us to erase your personal information in certain circumstances.
 - iv. **Your right to restriction of processing** - You have the right to ask us to restrict the processing of your personal information in certain circumstances.
 - v. **Your right to object to processing** - You have the right to object to the processing of your personal information in certain circumstances.
 - vi. **Your right to data portability** - You have the right to ask that we transfer the personal information you gave us to another organisation, or to you, in certain circumstances.
- c. You are not required to pay any charge for exercising your rights. If you

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make a request, we have one month to respond to you.

- d. If at any time you want to update, amend or remove your personal data or marketing preferences, please contact us in one of the following ways:
 - i. By email – info@dialysisfreedom.co.uk
 - ii. Via the website at www.dialysisfreedom.co.uk
 - iii. Call 01509808668
 - iv. Click on the unsubscribe or update my preferences links at the bottom of every email that we send to you.
 - v. Write to our Data Protection Officer
Dialysis Freedom Kidney Care UK
2 Back Lane
Cossington
Leicester
LE7 4UQ

7. How to complain

- a. If you have any concerns about our use of your personal information, you can make a complaint to us at Data Protection Officer, Dialysis Freedom Kidney Care UK, 2 Back Lane, Cossington, Leicester LE7 4UQ. You can also telephone us on 01509808668.
- b. You can also complain to the ICO if you are unhappy with how we have used your data.
- c. The ICO's address:
Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF
Helpline number: 0303 123 1113
ICO website: <https://www.ico.org.uk>

8. Making this policy great and updates

- a. Well done for getting to the bottom of this policy. We have designed it to be as transparent, useful and engaging as possible and we would love to hear your feedback on how we can make it even better - please contact us at info@dialysisfreedom.co.uk.
- b. Please don't make this the last time you read it as we will review this policy at least once a year to make sure it is up to date and accurate. As a result, we may need to make changes to the policy, which will be posted



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on our website or for any significant changes we will of course notify you by email.