

Privacy Policy



1. About us

We are Development and Learning Opportunities Ltd ("DALO"), our Company Registration number is 7387014 and our Registered Office address is 91 Brunswick Crescent, London, N11 1EE.

This Privacy Policy explains how and why DALO use your personal data. In this policy, when we talk about personal data we mean any information that relates to an identifiable natural person – in this case, you. When we use terms such as “we”, “us” and “our” in this policy, we mean DALO. We use the term “Member” to mean service user.

This policy applies to personal data processed by or collected on behalf of DALO. We may collect information from you when you visit our website, apply for a service, contact us by telephone or email or receive a communication from us relating to your service.

You should read this policy, so you know what personal data we collect about you, what we do with it and how you can exercise your rights in connection with it. You should also read any other privacy notices that we give you, that might apply to our use of your personal data in specific circumstances from time to time.

DALO is a “Data Controller”. This is a legal term which means that we make decisions about how and why we use your personal data. As the “Data Controller”, we are responsible for making sure that your personal data is used in accordance with applicable data protection laws. As Data Controller, we are required by law to give you the information in this policy.

However, on occasions there may be other Data Controllers involved in processing your data as further explained in this Policy, or as you may be advised at the time your information is to be processed.

At the foot of this Policy we have included links to external web sites providing further information to help you. We have also included details of contact points, including those for our Data Protection Officer, which you can use if you wish to ask us for further information or to exercise your rights. We reserve the right to change the policy at any time, so please check back regularly to keep informed of updates to this Policy.

2. What Personal Data do we collect from you?

This will depend on the service we provide to you or you provide to us (as a supplier or external facilitator).

Our Members

Personal data we hold is likely to include:

- your name
- your address and how to contact you or your parents/guardians
- your correspondence address (where different from address) and address history
- your date of birth and/or age as well as Gender
- details about your family, so that we can understand your family circumstances when providing support

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- details about you that are stored in documents in different formats, or copies of them. This could include things like your care plan, other medical or health related documents such as physiotherapy reports, passport, birth certificate, if this is necessary for us to comply with our legal and regulatory requirements.
- what we learn about you from letters, emails and conversations between us and your Parents/Guardians. This may include information about disabilities and /or diagnosis.
- information about you that will help us to provide the right level of support.your health, dietary requirements, likes, dislikes and if there are things about your behaviour that we need to know about to best support you
- your Independent living skills
- Previous school/colleges
- The name and contact details of other people who support you, for example Social workers or occupational therapists or carers, key workers, GP contact details
- We also hold information such as your likes and dislikes, your communication, allergies and dietary information, Personal care needs and about how we may need to support your behavior, so that we can provide support
- When there are incident or accidents, we record, report and store this information.

Suppliers

The data that we hold is likely to include

- your name
- company name
- your business address and correspondence address (where different from address)
- details of how we can make payments to you include account numbers and sort codes
- agreements and contracts
- email addresses

For some suppliers who work directly with our service users we will also hold

- details of DBS checks
- references
- ID documents, such as driving license or passport
- MOT and vehicle insurance details

3. What is the source of your personal data?

We will generally collect your personal data directly from you if you are a supplier or from your Parent Guardian if you are a Member, including information entered into our web site www.dalo.org.uk ("our site") when you send information to us using the contact us facility.

Information provided to us when you apply for our services, either via paper application forms Face-to-face contact, telephone calls, video conferences, emails, letters and other correspondence you have with us.

Information we have gathered from asking you to respond to surveys, although you do not have to complete them.

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Data from third parties we work with:

- Local Authorities / Social Workers
- Schools and Colleges
- Employers who may provide work experience

4. What we do with your data

We collect and process your data for several purposes, and for each purpose DALO must explain to you what legal grounds justify our processing of your personal data. Here are the legal grounds that are relevant to us:

Processing necessary to perform our contract with you for your product or service or for taking steps prior to entering into it during the application stage:

- Administering and managing your account and associated services, updating your records, tracing your whereabouts to contact you about your account and doing this for the recovery of debt;
- All stages and activities relevant to managing your account including enquiry, application, administration and management of accounts
- To manage how we work with other companies that provide services to us and our customers.
- To manage fees, charges and interest due on customer accounts
- To make payments to our suppliers
- To exercise our rights set out in agreements and contracts

Processing necessary to comply with our legal obligations:

- To carry out identify checks,
- For compliance with laws that apply to us
- For establishment, defence and enforcement of our legal rights or those of any other member of DALO
- For activities relating to the prevention, detection and investigation of crime
- To carry out monitoring and to keep records (see below)
- To deal with requests from you to exercise your rights under data protection law
- To process information about a crime or offence and proceedings related to that

When we share your personal data with these other people or organisations:

- Where we consider that, on balance, it is appropriate for us to do so, processing necessary for the following legitimate interests which apply to us and in some cases other organisations (who we list below) are:
- Administering and managing your account and services relating to that, updating your records, to contact you about your account, and doing this for recovering debt
- To request feedback about our services
- To adhere to guidance and best practice under the regimes of governmental and regulatory bodies such as HMRC, CQC the Information Commissioner's Office
- For management and audit of our business operations including accounting
- For market research and analysis and developing statistics

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When we share your personal data with these other people or organisations;

- Members of our Group
- Other account holders or individuals when we have to provide your information to them because some money paid to you by them should not be in your account
- Our legal and other professional advisers, auditors and actuaries
- Governmental and regulatory bodies such as HMRC, the Information Commissioner's Office

5. Processing with your consent

We may also from time to time ask you for your consent for other purposes, which we will explain to you at the time. For example, when you request that we share your personal data with someone else and consent to that.

For some of our processing of special categories of personal data such as about your health (and it will be explained to you when we ask for that explicit consent what purposes, sharing and use it is for.) Processing for a substantial public interest under laws that apply to us where this helps us to meet our broader social obligations such as:

Processing of your special categories of personal data such as about your health or if you are a vulnerable customer.

Processing that we need to do to fulfil our legal obligations and regulatory requirements.

When we share your personal data with other people and organisations such as members of our Group if they need to know that you are a vulnerable customer and your relatives, social services, your carer or the person who has power of attorney over your affairs.

6. How and when you can withdraw your consent

Much of what we do with your personal data is not based on your consent and is instead based on other legal grounds. For processing that is based on your consent, you have the right to revoke that consent for future processing at any time. You can do this by contacting us using the contact details at the end of this document.

7. Who might we share your data with?

In order to provide our services, there will be times when we will share your data. These include:

- Sharing with other parts of the DALO group
- We may disclose your personal data to any member of the DALO Group which means the DALO Ltd, DALO Holdings or DALO Travel.
- We will have in place an agreement with our service providers which will restrict how they are able to process your personal data. If any service provider is based outside of the European Economic Area, we will ensure that the provider is either a current subscriber to the EU/US Privacy Shield, or we have an appropriate contract for the international transfer of personal data with them.

We may share your personal information with these organisations to fulfill contractual obligations:

- Local Authorities

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- HM Revenue & Customs, regulators and other authorities
- Companies you ask us to share your data with.
- We may need to share your personal information with other organisations to provide you with a specific service you have chosen
- For courses of education and further development
- Sharing where we are obliged under a legal obligation

8. What we process and share

The personal data you have provided, we have collected from you, or we have received from third parties may include your:

- name
- date of birth
- residential address or business address
- contact details such as email address and telephone numbers

9. Automated decisions

As part of the processing of your personal data, decisions may be made by automated means. This applies to our Member, for example what activity groups they would benefit from, deciding on suitable key workers.

You have rights in relation to automated decision making: if you want to know more please contact us using the details above.

If DALO or substantially all of its assets are acquired by a third party, the personal data we hold about our customers will be one of the transferred assets.

10. Transferring Data Abroad

We will only send your data outside of the European Economic Area (EEA) to:

- Follow your instructions
- Comply with a legal duty
- On rare occasions, where this is required by suppliers i.e. for Travel arrangements / respite trips etc.

Safeguards include contractual obligations imposed on the recipients of your personal data. Those obligations require the recipient to protect your personal data to the standard required in the European Economic Area. Safeguards also include requiring the recipient to subscribe to 'international frameworks' intended to enable secure data sharing and where the framework is the means of protection for the personal data.

We protect your data using robust security and IT encryption measures as described in our Data Protection Policy.

You should also note that whenever fraud prevention agencies transfer your personal data outside of the European Economic Area (EEA), they impose contractual obligations on the recipients of that data

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to protect your personal data to the standard required in the EEA. They may also require the recipient to subscribe to 'international frameworks' intended to enable secure data sharing.

11. What should you do if your personal data changes?

You should tell us without delay so that we can update our records. This can be done by contacting the office by telephone, in writing or email to enquiries@dalo.org.uk

Do you have to provide your personal data to us?

We are unable to provide you with a product or service or to process your application without having personal data about you. Your personal data is required before you can enter into the relevant contract with us, or it is required during the life of that contract, or it is required by laws that apply to us. If we already hold some of the personal data that we need – for instance if you are already a customer – we may not need to collect it again when you make your application. In all other cases we will need to collect it except as follows:

In cases where providing some personal data is optional, we will make this clear. For instance, we will say in application forms, other documents and our website if information can be left blank.

12. How long we keep your information

Your data is important to us and we take all reasonable steps to maintain it safely and securely and fully in accordance with the General Data Protection Regulation.

We will keep your personal data for seven years from end of last financial year of our business relationship with you. This includes agreements, contracts, applications forms (paper and electronic), ID provided, details of payments compliments and complaints.

We keep data relating to prospective Employees or Members enquiries for 12 months if you consent to this. After this time, the data is securely disposed of.

We will securely dispose of data that is deemed unnecessary when our business relationship ends.

13. Marketing

We will keep you informed about DALO services unless you tell us you don't want this material. If at any time you wish to stop receiving marketing information from us, you can notify us by contacting us our office or by notifying our Data Protection Officer whose contact details are listed in the contact us section of this document.

14. Your Rights

Here is a list of the rights that all individuals have under data protection laws. They do not apply in all circumstances. If you wish to exercise any of them we will explain at that time if they are engaged or not. The right of data portability is only relevant from 25 May 2018.

The right to be informed - we must be transparent with you about the processing that we do with your personal data. This is why we have a privacy policy. The information that you supply is determined by whether we collected your personal data directly from you or indirectly via someone else. Your

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right to be informed may be relevant if you consider it necessary to ask for more information about what we do with your personal data.

The right to request access to the personal data held about you, to obtain confirmation that it is being processed, and to obtain certain prescribed information about how we process it. This may assist if you wish to find out what personal data we do have about you to then determine if you can exercise other rights (those mentioned above and below).

You can exercise this right by writing to us or emailing us. We will respond within one month.

The right to object to processing of your personal data where it is based on legitimate interests, where it is processed for direct marketing (including profiling relevant to direct marketing) or where it is processed for the purposes of statistics. Your rights to object may be relevant if you wish to find out more about what legitimate interests we rely on (they are listed in our privacy policy) or about what profiling we do in relation to our direct marketing communications and activities (as mentioned in our privacy policy) for instance. There is an important difference between the right to object to profiling relevant to direct marketing in cases where that profiling activity does not have a legal effect on you or otherwise significantly affect you, and the separate right which exists under data protection laws in relation to profiling including automated decision making which has a legal effect or can otherwise significantly affect you (see below).

The right to restrict processing of your personal data, for instance where you contest it as being inaccurate (until the accuracy is verified); where you have objected to the processing (where it was necessary for legitimate interests) and we are considering whether our organisation's legitimate interests override your own; where you consider that the processing is unlawful (and where this is the case) and where you oppose erasure and request restriction instead; or where we no longer need the personal data for the purposes of the processing for which we were holding it but where you require us to continue to hold it for the establishment, exercise or defence of legal claims.

The right to have your personal data erased (also known as the "right to be forgotten"). This enables an individual to request the deletion or removal of personal data where there is no compelling reason for its continued processing. This right is not absolute – it applies only in particular circumstances and where it does not apply any request for erasure will be rejected. It may be relevant where the personal data is no longer necessary in relation to the purpose for which it was originally collected/processed; if the processing is based on consent which you then withdraw; when you object to the processing and there is no overriding legitimate interest for continuing it; if the personal data is unlawfully processed; or if the personal data has to be erased to comply with a legal obligation. Requests for erasure may be refused in some circumstances such as where the personal data must be retained to comply with a legal obligation or to exercise or defend legal claims.

The right to have your personal data corrected if it is inaccurate and to have incomplete personal data completed in certain circumstances. If we have disclosed the personal data in question to other organisations, we must inform them of the rectification where possible. Your rights in relation to rectification may be relevant if you consider that we are processing inaccurate or incomplete information about you.

The right to data portability. This allows individuals to obtain and reuse their personal data for their own purposes across different services; to move, copy or transfer their personal data easily from one environment to another in a safe and secure way without hindrance to usability. This right can only be

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relevant where personal data is being processed based on a consent or for performance of a contract and is carried out by automated means. This right is different from the right of access (see above) and that the types of information you can obtain under the two separate rights may be different. You are not able to obtain through the data portability right all of the personal data that you can obtain through the right of access.

Rights in relation to automated decision making which has a legal effect or otherwise significantly affects you. This right allows individuals in certain circumstances to access certain safeguards against the risk that a potentially damaging decision is taken solely without human intervention. This right is different from the more general right to object to profiling (see above) because that other right is not tied to a scenario where there is a legal effect on you or where the processing otherwise significant affects you. Data protection laws prohibit this particular type of automated decision making except where it is necessary for entering into or performing a contract; is authorised by law; or where you have explicitly consented to it. In those cases, you have the right to obtain human intervention and an explanation of the decision and you may be able to challenge that decision.

You also have a right to complain to the Information Commissioner's Office ([ICO website](#)) which regulates the processing of personal data in the UK.

If you wish to find out more about your data subject rights or how to exercise them, please contact our Data Protection Officer using the contact information below.

15. Data Anonymisation and the use of Aggregated Information

Your personal data may be converted into statistical or aggregated data which cannot be used to re-identify you. It may then be used to produce statistical reports. This aggregated data may be shared and used in all the ways described in this privacy policy.

16. Useful Links

Information Commissioner's Office - <https://ico.org.uk/>

17. Contact us

You can contact our Data Protection officer at the following address: Data Protection Officer, DALO Ltd, 91 Brunswick Crescent, New Southgate, London, N11 1EE

Telephone: 020 8368 0943
email: enquiries@dalo.org.uk

18. Policy monitoring arrangements

This policy will be monitored and will be subject to regular review, which will take place within 6 months from the original date of issue of this policy and at 12-monthly intervals thereafter.

Updated date:	24th May 2018
To be reviewed:	by 24th May 2019