

Apasen Privacy Notice (UK GDPR)

1. Who We Are

Apasen is a UK registered charity providing social care and community support services to vulnerable individuals across Greater London.

- Registered Office: Carmine Wharf, 30 Copenhagen Place, London, E14 7FF
- E-mail (Bulbul Hasan: Data Protection Officer): bulbul.hasan@apasen.org.uk
- Website link: <https://www.apasen.org.uk/contact-us/>

Apasen is registered with the Care Quality Commission to provide personal care services.

For the purposes of UK data protection law, Apasen is the **Data Controller**.

2. Purpose of This Privacy Notice

This notice explains:

- What personal data we collect
- How and why we use it
- Your legal rights
- How we keep your information safe
- How to make a complaint

This notice complies with UK GDPR and the Data Protection Act 2018, and reflects guidance issued by the Information Commissioner's Office.

3. The Personal Data We Collect

We may collect and process personal data relating to:

a. Service Users

- Personal details (name, address, date of birth)
- Health and care information (special category data)
- Financial information (where relevant for services)
- Care plans, risk assessments, and safeguarding records

Release Date:	January 2026	Ref:	GDPR/01/26/1.2	Reviewed by:	B Hasan	Approved by:	Management
P/P Title:	General Data Protection Regulation (GDPR) Privacy Notice				Next Review:	January 2028	

b. Employees and Volunteers

- Contact and identification details
- Employment records, qualifications, and references
- DBS (criminal records) information
- Payroll and HR records

c. Third Parties

- Contractors, visitors, professionals involved in care delivery

4. Lawful Bases for Processing

We process personal data under the following lawful bases:

- **Consent** – where you have given clear permission
- **Contract** – to deliver care or employment obligations
- **Legal obligation** – to comply with regulatory requirements
- **Vital interests** – to protect someone's life
- **Public task** – where applicable in care provision
- **Legitimate interests** – where processing is necessary and proportionate

For **special category data** (e.g. health), we rely on:

- Health and social care purposes
- Safeguarding obligations
- Explicit consent (where required)

You have the right to **withdraw consent at any time** where consent is the lawful basis.

5. How We Collect Information

We collect data:

- Directly from you (forms, assessments, applications)
- From referrals (e.g. local authorities, healthcare professionals)
- Through our website and communication systems

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- During recruitment processes (including DBS checks with consent)

6. How We Use Your Information

We use personal data to:

- Deliver safe and effective care services
- Manage employment and recruitment
- Meet legal and regulatory requirements
- Safeguard vulnerable individuals
- Improve our services

We do **not** sell or use your data for marketing purposes.

7. Sharing Your Information

We only share information where necessary and appropriate:

- Healthcare professionals and local authorities
- Regulators (e.g. Care Quality Commission)
- Emergency services or safeguarding authorities
- Payroll, HR, and IT service providers

All sharing is done:

- On a **strict need-to-know basis**
- With appropriate safeguards
- In line with confidentiality obligations

We may share information **without consent** where required by law or to protect individuals.

8. Data Security

We implement appropriate technical and organisational measures, including:

- Secure electronic systems and access controls
- Staff training in data protection and confidentiality

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- Encryption and password protection
- Regular audits and system monitoring

We follow ICO-recommended security practices and maintain an **Information Security Policy**.

9. Data Retention

We retain personal data only as long as necessary, in line with:

- Legal and regulatory requirements
- Care sector retention schedules
- Organisational policies

Data is securely destroyed when no longer required.

10. Your Data Protection Rights

Under UK GDPR, you have the right to:

- Access your personal data
- Correct inaccurate or incomplete data
- Request deletion (in certain circumstances)
- Restrict processing
- Object to processing
- Data portability
- Withdraw consent at any time

To exercise your rights, contact: bulbul.hasan@apasen.org.uk

We will respond within **one month**.

11. How We Handle Data Subject Rights Requests

We have a formal process to:

- Verify identity before processing requests
- Log and track all requests

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- Respond within statutory deadlines
- Provide information in accessible formats where needed

Requests are reviewed by the Data Protection Officer.

12. Personal Data Breaches

Apasen has documented procedures to:

- Detect, report, and investigate breaches
- Assess risk to individuals
- Notify the Information Commissioner's Office within 72 hours where required
- Inform affected individuals when there is a high risk

All breaches are recorded and reviewed to prevent recurrence.

13. Complaints

If you are concerned about how we use your data:

1. Contact us first: bulbul.hasan@apasen.org.uk
2. Visit our website for guidance: <https://www.apasen.org.uk>

If you remain dissatisfied, you can complain to:

Information Commissioner's Office

Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF

Helpline: 0303 123 1113

Website: <https://www.ico.org.uk/make-a-complaint>

14. Keeping This Notice Up to Date

We regularly review this notice to ensure compliance with:

- UK GDPR
- Data Protection Act 2018
- ICO guidance

Updates will be published on our website.

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15. Related Policies

This notice should be read alongside:

- Data Protection Policy
- Information Security Policy
- Confidentiality Policy
- Records Management Policy
- Safeguarding Policy
- Complaints Policy

Key Improvements Made

- Added lawful bases and special category conditions
- Strengthened data subject rights handling process
- Included breach reporting procedures (72-hour rule)
- Improved ICO compliance language
- Clarified consent and withdrawal rights
- Added website reference and complaint pathway
- Standardised structure and tone

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