



SAINT JOHN OF GOD HOSPITALLER SERVICES

PRIVACY NOTICE FOR THE SJOG HOMES FOR UKRAINE MATCHING SERVICE ("NOTICE")

SUMMARY OF THE NOTICE

- A. The Notice on the next page applies to all persons who use our Homes for Ukraine Matching Service which is delivered in partnership with Caritas Social Action Network (**CSAN**).
- B. We are committed to ensuring that any personal information that we receive or collect about you is used fairly and lawfully by us, and is processed by us in accordance with relevant data protection law.
- C. The purpose of the Notice is to ensure that we are transparent and upfront with you about what personal information we hold about you and what we do with that information. Please note, the terms personal information and personal data are used interchangeably in the purpose of this privacy statement.
- D. The Notice on the following pages therefore covers the following questions:
 - 1. Who does this Notice apply to?
 - 2. What is the purpose of this Notice?
 - 3. What personal information do we hold about you?
 - 4. How do we use and share your personal information?
 - 5. How do we use the personal information of third parties?
 - 6. How long will we keep your personal information?
 - 7. How secure is the personal information that we collect about you?
 - 8. What are your rights in relation to your personal data?
 - 9. When and how can we make changes to this Notice?
 - 10. How can you get in contact with us?

- E. If you have any questions about the Notice then please contact our Data Protection Officer, Suite 1-3, Yarn, Lingfield House, Lingfield Point, Darlington, Co Durham, DL1 1RW or email DPO@sjog.org.uk.

1. WHO DOES THIS NOTICE APPLY TO?

- 1.1 This Notice applies to you, as a user (user is defined as a Sponsor Host or Ukrainian Guest), of the Saint John of God Hospitaller Services (**SJOG**) and CSAN Homes for Ukraine Matching Services.
- 1.2 Please note, that data is held and controlled by SJOG for matching purposes. CSAN does not process data for matching purposes.
- 1.3 In this Notice references to:
- 1.3.1 **we, us or our** means **Saint John of God Hospitaller Services** Limited (company number 05324279 and charity number 1108428) with its registered address at Suite 1-3, Yarn, Lingfield House, Lingfield Point, Darlington, Co Durham, DL1 1RW, who are the lead organisation for the Homes for Ukraine Matching Service;
- 1.3.2 **personal information** is information that is about you and which identifies you; and
- 1.3.3 **processing** (and **processed** and **process**) includes collecting, recording, altering, retrieving, storing, using, disclosing or destroying.

2. WHAT IS THE PURPOSE OF THIS NOTICE?

- 2.1 We are committed to ensuring that your privacy is protected and that we comply with all applicable data protection laws (including the UK General Data Protection Regulation, which is otherwise known as "the UK GDPR").
- 2.2 The purpose of this Notice is therefore to explain, for example:
- 2.2.1 **what** personal information we collect about you and who is responsible for the personal information we collect;
- 2.2.2 how we will **use** and **share** your personal information;
- 2.2.3 how long we will **keep** your personal information;
- 2.2.4 the **rights** that you have in relation to your personal information; and
- 2.2.5 how you can **contact us** about this Notice.

3. WHAT PERSONAL INFORMATION DO WE HOLD ABOUT YOU?

- 3.1 We will only collect, use and retain personal information about you that we believe we require.
- 3.2 We will not collect, use or retain personal information about you "just for the sake of it".
- 3.3 We will hold information about you which is submitted through the forms on our Homes for Ukraine website (<http://sjog-homesforukraine.uk/>) and for example when i) communicating with us by telephone, email or face to face; ii) engaging with us via our website or our social media pages; or iii) completing forms that we require from you.

(A) Personal information that you and/or your representatives provide to us

- 3.4 You may provide us with personal information about yourself, for example, when (i) communicating with us by telephone, email or face-to-face; (ii) engaging with us via our website or our social media pages; or (iii) completing forms that we require from you.

Personal information for Hosts (Sponsors) using the Homes for Ukraine Matching Service

- 3.5 **The personal information for Hosts (Sponsors)** that we receive about you, from you and/or your representatives, may include:

- 3.5.1 Personal details (including your name and address);
- 3.5.2 Personal information such as age, employment status, experience with vulnerable adults, number of people in the household, LGBTQ+ information, local connections
- 3.5.3 Health conditions which may be relevant to know for matching purposes;
- 3.5.4 Information about the accommodation, including location, building type;
- 3.5.5 Information about the number of people living in the household;
- 3.5.6 Contact(s) details (including name(s) and telephone number(s)) of someone who would be able to provide a reference for you;
- 3.5.7 General motivation for being involved in the scheme and any other information deemed necessary;

Personal information for Ukrainian Guests using the Homes for Ukraine Matching Service

- 3.6 If you are an individual who has been displaced by the war in Ukraine, looking to be hosted in the UK under the SJOG Homes for Ukraine Matching Service the personal information that we receive about you, from you and/or your representatives, may include:

- 3.6.1 Personal detail (including name and current location);
- 3.6.2 Personal information such as age home address and location in Ukraine, sex, photo information
- 3.6.3 If you have an international biometric passport
- 3.6.4 Information about the people you may be travelling with, including their age and sex.
- 3.6.5 Information about your health, disability or accessibility requirements that are needed in order to create a match;
- 3.6.6 Information about your preference in location and accommodation needs.

Personal information for all using the Homes for Ukraine Matching Service

- 3.7 When you visit our website or social media pages we may automatically collect the following personal information about you:

- 3.7.1 Technical information (including the Internet Protocol address (otherwise known as an "IP address") used to connect your computer to the internet, your login information, browser

type and version, time zone setting, browser plug-in types and versions, operating system and platform);

- 3.7.2 About your visit (including the full Uniform Resource Locators (otherwise known as a "URL") clickstream to, through and from our site (including date and time), services and pages you viewed or searched for, page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks and mouse-hovers), and methods used to browse away from the page and any phone number used to call us).

(B) Personal information that we receive about you from third parties

- 3.8 We may receive personal information about you from third parties. Those third parties may include:

- 3.8.1 Referees that you provide us with. These may provide us with details about, for example:

- (a) Your suitability to offer sponsorship;
- (b) Confirmation of your personal details (Name and address).

Special category information

- 3.9 Some of the personal information that we collect is known as "special category" information. This means that the information is more sensitive than other types of information and therefore needs more protection.
- 3.10 "Special category" information includes information about your health, sexual orientation, disability, accessibility requirement.
- 3.11 We do not routinely process personal data relating to criminal convictions and offences. In our host (sponsor form) we ask for a yes / no answer on if you have a clear DBS (criminal record) check in the past 2 years. This is so that we can check eligibility for the Homes for Ukraine Matching Service. We do not process any information beyond the yes / no answer.
- 3.12 If eligible, DBS checks are carried out by your Local Authority and your personal data related to the DBS check is held by them;

4. HOW DO WE USE AND SHARE YOUR PERSONAL INFORMATION?

- 4.1 We process personal data to enable us to deliver our Homes for Ukraine Matching Service.
- 4.2 Your personal data and that of individuals who accompany you or are part of your household is being collected as an essential part of the registration and matching process.
- 4.3 Your personal information may be used by us (including our staff), and disclosed to third parties, such as CSAN. Where information is shared this is limited to only information that is needed. For each of the purposes we have set out the legal basis on which we use and share your personal information in the table below.

Purpose for Processing Your Personal Data	Legal Basis
To communicate with you about your involvement in the Homes for Ukraine	This is in our legitimate interests in order to process and administer the Homes for Ukraine Matching Service

<p>Matching Service. This include information you submit through our scheme registration forms and webinar registration forms.</p>	<p>and/or in your legitimate interests in order to ensure that you receive appropriate services from us.</p>
<p>To help us to assess if the Homes for Ukraine Matching Service is appropriate for you and your suitability to sponsor or be matched.</p>	<p>This is in our legitimate interests in order to process and administer the Homes for Ukraine Matching Service in providing support to people seeking refuge from the war in Ukraine who seek sponsorship and/or accommodation with sponsors and/or other related support.</p>
<p>To create matches in line with the Homes for Ukraine Matching Service:</p> <p>Guest (Individual(s)) from Ukraine We process your personal data to help identify a UK host that may be well placed to accommodate you. This includes information as detailed in Section 3 of this privacy statement.</p> <p>Host (Sponsor) from UK We process your personal data to help you identify an individual or family that you may be well placed to support. This includes information as detailed in Section 3 of this privacy statement.</p>	<p>This is in our legitimate interests in order to process and administer the Homes for Ukraine Matching Service and/or in your legitimate interests in order to ensure that you receive appropriate services from us.</p>
<p>To introduce the sponsor and guest in order to assess suitability of the match.</p> <p>Host (Sponsor) from the UK We process your personal data to share your name and contact details and certain other details such as your location, languages and make up of your household, with refugees who you may be able to support.</p> <p>Guest (Individual(s)) from Ukraine We may process your personal data to share your name and contact details with hosts who may be able to accommodate you.</p>	<p>This is in our legitimate interests in order to process and administer the Homes for Ukraine Matching Service and/or in your legitimate interests in order to ensure that you receive appropriate services from us.</p>

<p>To work with third parties in delivering the project and service.</p> <p>Host (Sponsor) from the UK We may process your personal data to help you and any individuals from Ukraine that you host get support from other organisations relating to the Homes for Ukraine Matching Service, such as training, support with visa applications, arranging travel to the UK, or to provide support to you as a sponsor.</p> <p>We will share your personal information with local authorities that have responsibilities for safeguarding, DBS (criminal record check, property checks and other elements of the scheme.</p> <p>Guest (Individual(s)) from Ukraine We may process your personal information to help you get support from other organisations relating to the Homes for Ukraine Matching Service, such as training, support with visa applications, arranging travel to the UK.</p> <p>We will share your personal information with local authorities that have responsibilities for safeguarding, DBS (criminal record check, property checks and other elements of the scheme.</p>	<p>This is in our legitimate interests in order to process and administer the Homes for Ukraine Matching Service and/or in your legitimate interests in order to ensure that you receive appropriate services from us. Personal information would only be shared on an as needed basis.</p>
<p>To notify you about changes to our services.</p>	<p>This is in our legitimate interests in order to provide you with information about the Homes for Ukraine Matching Service.</p>
<p>We may ask you to share your experience of our services with us for us to share with the general public for marketing purposes.</p>	<p>Explicit Consent and you would receive a media consent form.</p> <p>You are free to refuse or withdraw your consent for marketing purposes at any time. Refusing or withdrawing consent will not impact upon the Homes for Ukraine Matching Services that you receive from us.</p>
<p>To communicate with third parties (e.g. the police and the CPS) where we have concerns about your safety/wellbeing, or the safety/wellbeing of others, or have grounds to suspect criminal behaviour.</p>	<p>This can be considered a vital interests of any victim or alleged victim and/or in compliance with a legal obligation.</p> <p>Where the information is special category information, we may process that information where necessary in relation to legal claims and/or for reasons of substantial public interest.</p>

To resolve queries and enquiries relating to the Homes for Ukraine Matching Service	This is in our legitimate interests in order to administer the Homes for Ukraine Matching Service.
To manage a dispute, appeal or complaint.	This is in our legitimate interests in order to administer the Homes for Ukraine Matching Services and to benefit you and other people supported (sponsor or guest) through the Homes for Ukraine Matching Service. In certain circumstances we may, as an alternative, seek your consent.
To comply with any legal or regulatory obligations and in doing so, will need to disclose your personal information to third parties, including relevant regulators.	This is to comply with our legal obligations.

5. HOW DO WE USE THE PERSONAL INFORMATION OF THIRD PARTIES?

- 5.1 In the course of your dealings with us you may provide us with personal information relating to third parties. This includes details of your referee but may also be information of other people in your home or who are travelling with you (as applicable).
- 5.2 We will use personal information about third parties that you provide to us in accordance with this Notice.
- 5.3 If you are providing personal information to us relating to a third party, such as referee or person you are travelling with, we will assume, unless you tell us otherwise, that you have the permission of that third party to share their personal information with us, that you have made the information in this Notice available to that third party, and that we have permission to contact that third party (if we consider necessary).

6. HOW LONG WILL WE KEEP YOUR PERSONAL INFORMATION?

- 6.1 We will keep your personal information for as long as is necessary for the purpose for which we collect it to deliver the Homes for Ukraine Matching Service in line with our funder guidelines. The exact period will therefore depend on the purpose for which we hold your personal information. For example, where we hold personal information:
- 6.1.1 To comply with a legal or regulatory obligation, we will keep that information for at least as long as is required to comply with that obligation;
 - 6.1.2 To provide services for you, we will keep the information for at least as long as we provide the services for you, and for a number of years after the services provided for you cease;
 - 6.1.3 To help to improve our services, we will hold your personal information for at least as long as required to design, implement and monitor any such improvements.
- 6.2 We may extend the period for which we keep your personal information in the event that legal proceedings are brought in relation to the services that you receive / have received from us. In those circumstances we may need to retain some relevant personal information for as long as is necessary for the purposes of such litigation.

7. HOW SECURE IS THE PERSONAL INFORMATION THAT WE COLLECT ABOUT YOU?

- 7.1 We have put in place appropriate security measures to help protect your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed.
- 7.2 We also limit access to your personal information to those employees, workers, agents, contractors and other third parties who have a business need-to-know. They will only process your personal information on our instructions and will be subject to a duty of confidentiality.
- 7.3 We have processes in place to ensure that any personal information that we keep in hard copy form is stored securely.
- 7.4 Where we keep personal information in soft copy, that is stored either on our secure servers or on secure servers operated by a third party.
- 7.5 Please note that the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal information transmitted via the internet, we cannot guarantee the security of your personal information transmitted in this way and any transmission is at your own risk. Once we have received your personal information, we will use strict procedures and security features to try to prevent unauthorised access.
- 7.6 We have put in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator(s) of a suspected breach where we are legally required to do so.

International data transfers

- 7.7 We may, on occasion, transfer your personal information outside the UK, for example where we need to share your name and contact details with a potential host or guest, when both parties are not located in the UK. Before doing so we will ensure that the personal information transferred is kept to a minimum and we will require the third parties receiving the information to respect the security of your personal information and to treat it in accordance with relevant data protection legislation.

8. WHAT ARE YOUR RIGHTS IN RELATION TO YOUR PERSONAL INFORMATION?

- 8.1 You have certain rights in relation to your personal information. Those apply in certain circumstances and are subject to certain exemptions. In summary, those rights are:

	Summary of your rights
Right of access to your personal information	You have the right to receive a copy of your personal information that we hold about you.
Right to rectify your personal information	You have the right to ask us to correct the personal information that we hold about you where it is incorrect or incomplete. If any of the personal information that we hold about you changes then we encourage you to please let us know as soon as possible so that we can ensure our records about you are accurate and up-to-date.
Right to erasure of your personal information	You have the right to request that we erase all information we hold about you if the information is no longer being used for

	Summary of your rights
	the purposes you have consented to or if you revoke any consent given to us processing that information.
Right to restrict the use of your personal information	You have the right to request that we suspend our use of your personal information in certain circumstances.
Right to data portability	You have the right to request that we copy or transfer your personal information to another service provider.
Right to object to the use of your personal information	You have the right to object to the use of your personal information.
Right to withdraw consent	You have the right to withdraw your consent at any time where we rely on consent to process your personal information.
Right to complain to the data protection regulator for England and Wales	<p>You have the right to complain to the Information Commissioner's Office (otherwise known as the "ICO") where you think we have not used your personal information in accordance with data protection law.</p> <p>You can contact the ICO on 0303 123 1113 or by visiting their website at www.ico.org.uk.</p> <p>Please note that we are registered with the ICO as a data controller under number Z9607924. It may be useful to quote this number in your correspondence to the ICO.</p>

9. WHEN AND HOW CAN WE MAKE CHANGES TO THIS NOTICE?

- 9.1 We may update this Notice at any time. If we do, we will make the updated version available on our website.

10. HOW CAN YOU GET IN CONTACT WITH US?

- 10.1 If you have any questions regarding this Notice, or the way we use your personal information, or wish to exercise any of your rights set out in section 8 above then please contact our Data Protection Officer at Suite 1-3, Yarn, Lingfield House, Lingfield Point, Darlington, Co Durham, DL1 1RW or email jamiemackrill@sjog.org.uk; Tel: 07508 431 049

End.

November 2022