

TJP Privacy Policy

April 2019

Introduction

1. The Jeanie Project (TJP) is a non-for-profit organisation, registered in England, providing services to civil society organisations and charities to support access to justice.
2. TJP makes available a platform (website) called 'Jeanie KIM', under licence from KIM Technologies, to its Client Partners (community organisations including MP surgeries, charities, community groups, food banks and others) to support the collection of information from Clients (the individuals presenting at its Client Partners) to enable support for their legal issues through qualified pro bono advisors or registered advice agencies.
3. Data is provided by clients, and collected by Client Partners (through staff and volunteers – operators) and input either directly (in presence of client) or indirectly (after client has left meeting) into Jeanie KIM.
4. All clients must agree to the User Agreement before any issue data can be stored – by definition this provides a 'contract' and 'consent'. This grants TJP and its registered advisors access to the data in order to provide legal support.
5. All users (operators and advisors) have their own independent login and actions are logged.
6. TJP also collects personal data relating to Pro Bono Advisors – for the purposes of recruiting and facilitating pro bono advice - and retains this within Google Drive and related cloud based platforms
7. The Jeanie KIM platform and all data is securely hosted in the UK.
8. TJP considers that it is exempt from any obligation to appoint a Data Protection Officer ("DPO") under GDPR, but it does accept its obligation to carry out processing in ways which are lawful, fair and transparent. The Jeanie Project is acting as a Data Controller and KIM Technologies, the provider and host of the platform, is acting as a Data Processor.

Types of Data Collected and Stored

9. TJP collects and stores data and information relating to a client's personal details (e.g. name and contact information) and their specific issue (e.g. immigration, housing, employment or other). Some data may be of a sensitive data (e.g. if relating to employment discrimination) but is only collected if absolutely required and only with the consent of the client.
10. Operators will only record data which the client (a) provides to them and (b) verbally consents for them to record. Clients will be made aware why TJP is asking for specific information – always in the interests of the information which is required to enable a legal advisor to understand and support their case.
11. Clients are entitled to receive a copy of their data either at the point of collection (by requesting a printout of data entered into Jeanie KIM whilst at the community organisation where it was collected) or by making a formal subject access request by email to jeaniehelpdesk@gmail.com from the email address they recorded when registering on the

system. Subject access requests may also be made in writing but identification checks will need to be made to verify the identity of the person making the request.

Use, Transfer and Sharing of Data

12. Jeanie KIM Data will always be stored within the UK within a secure data centre and is kept strictly confidential. The Jeanie KIM platform is managed and hosted through KIM Technologies, a company registered in England. KIM Technologies only have access to Jeanie KIM data at the discretion of The Jeanie Project and then only to resolve technical issues with the platform.
13. TJP's role in facilitating access to legal support requires it to make data available, within the KIM platform, to registered legal advisors. Advisors will access client information within the platform but may be required to further share that information outside the platform if legally required to do so (e.g. if a client says they are hurting, or will hurt, themselves or someone else).
14. Data will be available to multiple legal advisors. This ensures legal advisors can identify which cases they are best able to support and help with. All legal advisors are bound by professional standards and confidentiality and adhere to the pro bono protocol - <https://www.lawworks.org.uk/why-pro-bono/what-pro-bono/pro-bono-protocol>
15. In certain cases, some legal advisors may access the platform from outside the UK but this is via a secure link and no data will be stored outside the UK.
16. TJP may process and use anonymised data (data stripped of personal identifying features) to understand and inform the nature and volume of specific issues (e.g. nature of housing issues in a particular area) in order to improve both the Jeanie KIM platform, understand the level of resourcing needed and support improvements to policy, access to justice and other related issues.
17. In the event of there being a data breach, the Company undertakes to inform the client, client partner (as well as any relevant authority) not later than one month of TJP becoming aware of the breach (within 72 hours if such data is highly sensitive).

Retention of Data

18. TJP will retain data in Jeanie KIM for as long as necessary to support a client and resolve an issue, but no longer than three years, unless legally required to do so.

Your Rights

19. To Complain: Ideally TJP would wish to try and deal with complaints itself before recourse to any external authority and ask any complainants to submit complaints via email to jeaniehelpdesk@gmail.com but is open to complainants to submit a complaint at any time to the Office of the Information Commissioner (www.ico.gov.uk).
20. To be aware of what data is held and have correct data recorded by TJP: TJP will make available all data, where legally permissible, to clients on receipt of the appropriate Subject



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Access Request and will be happy to correct errors as soon as practicable after TJP becomes aware of the error.

21. To require TJP to erase data which it holds about the subject: TJP will process requests to erase data in line with legislation. TJP remind clients and advisors that in relation to any information passed to a third party, data cannot, once given, be retrieved or erased.

Dr Simon Davey, The Jeanie Project

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jeaniehelpdesk@gmail.com