



## Bosnia and Herzegovina Community Advice Centre (BHCAC)

### Privacy Notice

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Bosnia and Herzegovina Community Advice Centre (BHCAC) is a registered charity supporting individuals and families experiencing poverty and inequality. We are registered with the Information Commissioner's Office (ICO) under registration number **Z9328277**.

#### 1. Who we are and how to contact us

##### Data Controller:

BHCAC determines how and why your personal information is used.

##### Contact details:

- **Email:** [info@bhcac.org.uk](mailto:info@bhcac.org.uk)
- **Post:** BHCAC, Rear of 108 High Road Willesden, London, NW10 2PP
- **Telephone:** 020 8459 4201

##### Data Protection Contact:

Please address privacy questions and data-protection requests to our **Data Protection Lead**.

#### 2. What this notice covers

This notice explains how we collect, use, share and protect your personal information when you:

- contact us for advice or support
- join as a member
- participate in our activities or events
- donate or make payments through our website
- visit our website
- work with us as a staff, volunteer, partner, or supplier.

#### 3. Personal information we collect

##### 3.1 Personal data

Depending on your interaction with us, we may collect:

- Identity and contact details (name, address, phone, email)
- Casework information and supporting documents
- Financial information where required for casework or donations
- Health or care information relevant to your enquiry
- Family/household information
- Communication records (calls, emails, messages, WhatsApp)

### **3.2 Special category personal data**

Where relevant and necessary for our work, we may collect information relating to:

- ethnicity
- disability

We only process this information where necessary and with an appropriate condition for processing.

We apply additional safeguards due to the sensitivity of this data.

### **3.3 How we obtain information**

We collect information:

- directly from you (forms, calls, meetings, email, WhatsApp, website forms)
- from documents you provide
- from third parties with your permission or where required/allowed by law

Where we receive information indirectly, we will provide you with appropriate transparency information within required timeframes.

## **4. Why we use your information and our lawful bases**

### **4.1 Providing advice, support and casework**

**Purpose:** assessing needs, giving advice, managing cases, and communicating with you.

**Lawful bases:**

- delivering services where necessary
- legitimate interests (providing charitable services effectively)

**Special category data:** processed only where relevant and with an appropriate condition.

### **4.2 Monitoring, evaluation, and improving services**

**Purpose:** understanding community needs, improving services, reporting to funders.

**Lawful basis:** legitimate interests (ensuring effective delivery and improvement of charitable services).

Where monitoring involves sensitive information, we use an appropriate condition and apply safeguards.

### **4.3 Event updates and service information**

We may contact you about events or activities that may interest you.

Where these communications constitute direct marketing, we will obtain your consent and provide easy opt-out options in every message.

### **4.4 Marketing materials, photos and case studies**

We will only use identifiable photos or stories for publicity or promotional purposes where you have provided explicit consent.

### **4.5 Donations and website payments**

**Purpose:** processing online donations and payments and maintaining necessary financial records.

**Lawful bases:**

- necessary for processing a transaction
- necessary for record-keeping obligations

### **4.6 Legal compliance, safeguarding and protection**

We may use your information to meet required legal duties, respond to lawful requests, protect individuals, prevent fraud, and safeguard our organisation.

## 5. Who we share your information with

We only share personal information where necessary, appropriate, and lawful.

Typical sharing includes:

- **Case management provider:** AdvicePro (secure, encrypted system)
- **Service delivery partners:** referral organisations, interpreters (where needed)
- **Website/payment providers:** Voice (e-voice) and KindLink
- **Professional advisers:** auditors or insurers where necessary
- **Regulators, law enforcement or courts:** where required or to protect individuals

We ensure all service providers handling personal information act on our instructions, keep it secure, and do not use it for their own purposes.

## 6. International transfers

Some of the services we use may involve transfers outside the UK—e.g., communications tools (such as WhatsApp) or embedded services such as mapping features.

Where this occurs, we ensure appropriate safeguards are in place and only transfer data where adequate protection exists.

These expectations reflect recent updates clarifying how international transfers must be safeguarded. [\[gov.uk\]](https://www.gov.uk)

## 7. How we keep your information secure

We use appropriate technical and organisational measures to protect your information from loss, misuse, unauthorised access or disclosure.

Access is limited to people who need it for their role and who are bound by confidentiality.

We have procedures for identifying and managing data breaches and will notify individuals and regulators where required.

## 8. How long we keep your information

We keep personal information only as long as necessary for the purpose collected, including meeting legal, reporting or accountability requirements.

Standard retention periods include:

- **Client case files:** 6 years after last contact
- **Financial/payment records:** 7 years after the financial year ends
- **Website enquiries:** typically up to 12 months after closure
- **Marketing/event consent records:** while you remain subscribed and for a reasonable period afterwards

After retention expires, we securely delete or anonymise data.

## 9. Your rights

You have the following rights over your personal information:

- access
- rectification
- erasure (in certain circumstances)
- restriction
- objection (including absolute right to object to direct marketing)
- data portability (where applicable)

- rights relating to automated decision-making and profiling

**Withdrawing consent:**

Where we rely on consent, you may withdraw it at any time.

**How to exercise your rights:**

Email [info@bhcac.org.uk](mailto:info@bhcac.org.uk) or write to the address above.

We may need to verify your identity before responding.

**10. Complaints**

If you have concerns about how your information has been handled, please contact us first so we can investigate.

You also have the right to raise concerns with the ICO: <https://ico.org.uk/>

**11. How we contact you (WhatsApp, phone, email, post)****Service messages (not marketing):**

We may contact you to:

- arrange appointments
- request documents
- provide updates
- respond to enquiries

**Event invitations and marketing messages:**

Where these constitute direct marketing, we will seek consent and provide clear opt-out mechanisms (e.g., “STOP” or “unsubscribe”).

**12. Cookies, website technologies and embedded content**

Our website uses essential cookies required for core functionality. Some embedded services (such as maps or video content) may use additional storage technologies.

Recent UK updates allow certain functional or statistical cookies to operate without consent, but transparency about their use and the ability to manage preferences remains important. [\[ico.org.uk\]](https://ico.org.uk)

More details about website cookies and technologies are available on the platform hosting our website.

**13. Accuracy of information**

Please let us know if your contact details or circumstances change so we can keep our records accurate.

**14. Changes to this privacy notice**

We keep this notice under regular review. Updates will be published on our website.