

Zest Privacy Notice

Part of the Calico Group

This privacy notice explains how Zest collects, uses, stores and shares personal information when delivering its services, activities, support and community programmes. It is intended to be clear, transparent and easy to understand, in line with the UK General Data Protection Regulation, the Data Protection Act 2018 and relevant changes introduced by the Data (Use and Access) Act 2025.

1. Who we are

Zest is part of the Calico Group. We provide activities, services and support that help people and communities to improve wellbeing, independence, confidence, skills and access to opportunities. In this notice, “Zest”, “we”, “us” and “our” means Zest and, where appropriate, the Calico Group organisations involved in supporting or delivering our services.

2. Our role under data protection law

For most of the personal information described in this notice, Zest will act as a data controller. This means we decide why and how personal information is used. In some situations, we may work with other organisations as joint controllers or use service providers who act as processors on our behalf.

3. How to contact us

If you have any questions about this privacy notice or how we use your personal information, you can contact Zest using the contact details published on our website or through your usual Zest contact. You can also contact the Calico Group Data Protection Officer or data protection lead using the Group’s published data protection contact route.

4. What personal information we collect

We may collect your name, contact details, date of birth, address, emergency contact information, communication preferences, referral information, support needs, attendance records, feedback, equality and diversity information, health or wellbeing information where relevant, safeguarding information, images or recordings where applicable, and information about your involvement with our services.

5. Special category and sensitive information

Some information we use may be more sensitive, such as information about health, disability, ethnicity, religion, sexual orientation or other equality characteristics. We only use this information where it is necessary, proportionate and supported by an appropriate lawful basis and condition under data protection law, for example to provide tailored support, meet safeguarding responsibilities, monitor equality of access or comply with legal duties.

6. How we collect personal information

We collect personal information directly from you when you contact us, complete forms, attend activities, use our services, provide feedback or communicate with staff. We may also receive information from referral partners, health and social care services, local authorities, housing providers, schools, community organisations, funders, safeguarding partners or other Calico Group organisations where this is relevant and lawful.

7. Why we use personal information

We use personal information to assess eligibility, manage referrals, deliver services and activities, provide support, keep in touch, respond to enquiries, manage bookings and attendance, meet safeguarding responsibilities, monitor outcomes, report to funders, improve our services, deal with complaints, keep people safe and comply with legal, contractual and regulatory requirements.

8. Lawful bases for using your information

Depending on the activity, we may rely on consent, contract, legal obligation, vital interests, public task or legitimate interests. For special category information, we may rely on explicit consent, substantial public interest, health or social care purposes, safeguarding, equality monitoring or other conditions set out in data protection law. We will identify and document the appropriate lawful basis for each processing activity.

The table below gives a practical breakdown of the main types of personal information we may process, why we use it and the lawful basis we are likely to rely on. The exact lawful basis may vary depending on the service, referral route or circumstances.

Type of information	Why we use it	UK GDPR lawful basis	Special category condition, where relevant
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Name, address, contact details and date of birth	To identify you, manage referrals, communicate with you, provide services and maintain accurate records.	Article 6(1)(b) contract, Article 6(1)(c) legal obligation, Article 6(1)(e) public task or Article 6(1)(f) legitimate interests, depending on the service.	Not usually applicable.
Referral, eligibility and assessment information	To understand your needs, assess suitability, allocate support and deliver appropriate services.	Article 6(1)(b) contract, Article 6(1)(e) public task or Article 6(1)(f) legitimate interests.	Article 9(2)(h) health or social care, Article 9(2)(g) substantial public interest or explicit consent where appropriate.
Health, wellbeing, disability or support needs	To provide tailored support, make reasonable adjustments, manage risk and support wellbeing.	Article 6(1)(d) vital interests, Article 6(1)(e) public task or Article 6(1)(f) legitimate interests.	Article 9(2)(h) health or social care, Article 9(2)(g) substantial public interest or Article 9(2)(a) explicit consent where appropriate.
Safeguarding, risk or incident information	To protect individuals from harm, manage safeguarding concerns, respond to incidents and share information with appropriate agencies where necessary.	Article 6(1)(c) legal obligation, Article 6(1)(d) vital interests, Article 6(1)(e) public task or Article 6(1)(f) legitimate interests.	Article 9(2)(g) substantial public interest, Article 9(2)(h) health or social care or Article 9(2)(c) vital interests.
Attendance, participation and service outcome information	To manage activities, monitor engagement, evidence service delivery, evaluate outcomes and report to funders or commissioners.	Article 6(1)(b) contract, Article 6(1)(e) public task or Article 6(1)(f) legitimate interests.	Not usually applicable unless outcomes include health, wellbeing or other special category information.

Equality, diversity and inclusion information	To monitor access, identify barriers, improve inclusion, support fair outcomes and meet funder or legal reporting requirements.	Article 6(1)(c) legal obligation, Article 6(1)(e) public task or Article 6(1)(f) legitimate interests.	Article 9(2)(g) substantial public interest, including equality of opportunity or treatment, or explicit consent where appropriate.
Photographs, videos, case studies or testimonials	To promote services, share success stories, support funding reports or communicate the impact of Zest's work.	Article 6(1)(a) consent or Article 6(1)(f) legitimate interests, depending on the context and use.	Explicit consent may be required where the material reveals special category information.
Complaints, feedback and enquiry information	To respond to enquiries, investigate complaints, improve services, meet accountability requirements and evidence how concerns have been handled.	Article 6(1)(c) legal obligation, Article 6(1)(e) public task or Article 6(1)(f) legitimate interests.	Article 9(2)(g) substantial public interest or another relevant condition where complaint information includes special category data.
Website, online form and digital interaction information	To operate our website, respond to online enquiries, keep systems secure, understand service demand and improve digital content.	Article 6(1)(a) consent for non-essential cookies, Article 6(1)(f) legitimate interests for service administration and security, or Article 6(1)(c) legal obligation where applicable.	Not usually applicable.

9. Legitimate interests

Where we rely on legitimate interests, we will only do so where we have balanced our interests against your rights and freedoms. Our legitimate interests may include running safe and effective services, improving what we do, managing relationships with participants and partners, protecting our organisation from misuse or harm, and maintaining appropriate records.

10. Consent

Where we rely on consent, we will explain what you are agreeing to and you can withdraw your consent at any time. Withdrawing consent will not affect the lawfulness of anything we have already done before you withdrew it. In some cases, we may still need to keep or use information where another lawful basis applies.

11. Children and young people

Where we provide services to children or young people, we will explain how their information is used in a way that is clear and appropriate for their age and understanding. We may involve parents, carers or guardians where appropriate, but we will also respect the rights of children and young people where they are able to understand and exercise those rights themselves.

12. Equality, diversity and inclusion information

We may collect equality, diversity and inclusion information to understand who uses our services, identify barriers, improve access, meet funder or legal requirements and support fair outcomes. Wherever possible, we use this information in a way that does not identify individuals in reports or statistics.

13. Safeguarding and wellbeing

We may use and share personal information where necessary to protect a person from harm, abuse, neglect or serious risk. This may include sharing information with safeguarding partners, emergency services, health and social care professionals, local authorities or other relevant organisations. We will only share what is necessary and proportionate in the circumstances.

14. Who we share information with

We may share personal information with other Calico Group organisations, referral partners, local authorities, commissioners, funders, health and social care organisations, safeguarding partners, emergency services, professional advisers, IT and system providers, auditors, regulators and other organisations where sharing is lawful, necessary and proportionate.

15. Sharing information within the Calico Group

As Zest is part of the Calico Group, we may share information within the Group where this supports service delivery, governance, safeguarding, complaints handling, legal

compliance, reporting, system administration or organisational management. Information will only be shared where there is a clear purpose and an appropriate lawful basis.

16. Funders, commissioners and reporting

Where services are funded or commissioned by another organisation, we may need to provide information to evidence delivery, outcomes, attendance, eligibility or impact. Wherever possible, reporting will use anonymised or aggregated information. If identifiable information is required, we will ensure there is a lawful basis and that only necessary information is shared.

17. How long we keep information

We only keep personal information for as long as we need it for the purpose it was collected, including to meet legal, contractual, safeguarding, audit, funding, complaints or reporting requirements. Retention periods may vary depending on the type of information and service involved. When information is no longer needed, it will be securely deleted, destroyed or anonymised.

18. How we keep information secure

We use appropriate technical and organisational measures to protect personal information from unauthorised access, loss, misuse, alteration or disclosure. This includes access controls, staff training, secure systems, confidentiality requirements, information governance procedures and appropriate checks on suppliers who process information for us.

19. International transfers

We aim to keep personal information within the UK wherever possible. If information needs to be transferred outside the UK, we will ensure appropriate safeguards are in place, such as adequacy arrangements, approved contractual protections or other lawful transfer mechanisms.

20. Your rights

You have rights under data protection law, including the right to be informed, access your personal information, ask for inaccurate information to be corrected, ask for information to be erased in certain circumstances, restrict or object to processing, request data portability where applicable, withdraw consent where we rely on consent,

and challenge certain automated decisions. Some rights only apply in particular circumstances.

21. Complaints and DUAA complaint handling

If you are unhappy with how we use your personal information, we would encourage you to raise this with us first so we can look into your concerns. We will provide a way for you to make a data protection complaint, acknowledge receipt within 30 days, make appropriate enquiries without undue delay, keep you informed where needed, and tell you the outcome without undue delay. This reflects the complaints-handling requirements introduced by the Data (Use and Access) Act 2025 and ICO guidance.

You also have the right to complain to the Information Commissioner's Office, the UK regulator for data protection. The ICO's contact details are available at www.ico.org.uk. The ICO normally expects you to give us the opportunity to respond to your complaint before it considers the matter.

22. Changes to this privacy notice

We may update this privacy notice from time to time to reflect changes in our services, legal requirements, ICO guidance or how we use personal information. The latest version should be made available on the Zest website and through appropriate service channels.