



Just Straight Talk Privacy Notice 2026

Who are we?

Just Straight Talk CIC is a community interest company that provides support, learning, and community-based services. Just Straight Talk (JST) is registered with Companies House, company no. 08259248. The HUB, 30 Ebenezer Street, Bilston, WV14 9LJ. We are registered with the Information Commissioner's Office under registration number ZA053965.

This privacy notice explains how we collect, use, store, share, and protect personal data when people access or engage with our services.

When you use JST's services, you may provide us with your Personal Data. We only collect data to administer your interaction with us. Just Straight Talk CIC is the Data Controller for the personal data we collect and process. The Data Protection Lead is Kate Beale, who can be contacted at kate@juststraighttalk.org.

This notice applies to all data subjects whose personal data is processed by Just Straight Talk CIC, including service users, participants, learners, and group users.

By engaging with our services, you acknowledge that we may collect and use your personal data for the purposes set out in this notice and in connection with the support you receive from us.

All employees of Just Straight Talk who interact with data subjects must ensure that individuals have the opportunity to read and understand confidentiality and data-sharing information before personal data is collected or processed. Where consent is required, it must be clearly requested for each relevant project or service. The exception to this is the Digital Divide project, where, in line with contractual requirements, each learner receives and signs the JST privacy policy.

How we secure your data

Just Straight Talk applies appropriate technical and organisational measures to protect personal data. We minimise the risk of unauthorised access, loss, misuse, or disclosure and ensure that staff understand their responsibilities for handling personal data securely.

How do we collect your information?

The information we collect will depend on the project or service you access and the type of support you receive. We may collect information directly from you through referrals, registration forms, assessments, appointments, group sessions, learning activities, correspondence, or other interactions with our staff.

We may also receive limited information from funders, commissioners, referral partners, delivery partners, or other organisations involved in your support where this is necessary and lawful.

What personal data do we collect?

We collect different types of personal data depending on the project or service you access. This may include:

- Name and contact details, including address, email address, and telephone number.
- Date of birth and other information needed to identify you.
- Information about your needs, circumstances, goals, support plan, progress, and outcomes.
- Equality, diversity, and inclusion monitoring information.
- Learning, participation, attendance, assessment, or achievement information where relevant.
- Health, wellbeing, disability, safeguarding, or vulnerability information where this is relevant to the support provided.
- Information required by funders, commissioners, contracts, legal obligations, or project reporting requirements.
- Records of communication, consent, referrals, appointments, case notes, and service activity.

Special category data

The UK GDPR identifies certain types of personal data as special category data. This includes information about racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic data, biometric data used for identification, health data, sex life, and sexual orientation.

- Special category data will only be collected and processed where there is a lawful basis for doing so.
- Where required, your explicit consent will be obtained.
- When we ask you to provide special category or otherwise sensitive information, we will explain why it is needed and how it will be used.

What do we use your information for?

We may use your personal data to:

- Provide a comprehensive and professional service that meets your needs.
- Manage referrals, assessments, appointments, casework, learning, group activities, and support plans.
- Record your participation, progress, outcomes, and feedback.
- Meet funder, contractual, monitoring, audit, reporting, and evaluation requirements.
- Measure equality, diversity, and inclusion.
- Record relevant information within our Customer Management System, Create Adapt.
- Improve the quality, safety, and effectiveness of our services.
- Comply with legal, safeguarding, regulatory, and contractual obligations.

What is the lawful basis for processing your personal data?

The law sets out a number of lawful bases that allow organisations to collect and process personal data. Depending on the project, service, and purpose, Just Straight Talk may process personal data because:

- It is necessary to deliver a service or meet contractual obligations. We are required by funders of our services to collect your personal data; these include: WMCA/Digital Divide – NHS/WorkWell, CHADD/Young People's Alliance, Citizens Advice/ Digi Dudley, National Lottery Community Fund/NeuroKind/Choose Yourself.
- It is required to meet legal, safeguarding, regulatory, or statutory obligations.
- It is necessary for legitimate business purposes, such as service delivery, quality monitoring, administration, evaluation, and organisational reporting.
- It is necessary to meet funder, commissioner, or project requirements.
- You have given consent, where consent is the lawful basis for processing.

Where consent is relied upon, it must be freely given, specific, informed, and unambiguous. Where special category data is processed on the basis of consent, that consent must be explicit.

How long do we keep your information?

We will not retain personal data for longer than is necessary. Retention periods may vary depending on the project, service, contractual obligations, legal requirements, and funder conditions.

When a service or contract ends, personal data will be securely retained or disposed of in line with our retention and data disposal procedures.

Who has access to your personal data?

Access to your personal data is limited to Just Straight Talk staff, volunteers, authorised representatives, or delivery partners who need the information to provide services, manage your support, complete administration, or meet contractual, legal, safeguarding, or reporting requirements.

We may share your personal data with third-party organisations or service providers where this is necessary to deliver services, meet contractual or funding requirements, support safeguarding, or comply with the law. Where third parties process personal data on our behalf, we will ensure that they do so securely and only for authorised purposes.

We will not share your personal data unlawfully and, where consent is required, we will obtain it before sharing.

What are your data rights and how can you access them?

UK GDPR gives you rights over your personal data. These include the right to access the information we hold about you, ask for inaccurate information to be corrected, request erasure or restriction in certain circumstances, object to processing in certain circumstances, request data portability where applicable, and withdraw consent where consent is the lawful basis for processing.

Accessing your rights

You can make a request verbally or in writing. To access your data rights or raise a query about your personal data, please contact the Managing Director at kate@juststraighttalk.org or write to JST – The Hub, 30 Ebenezer Street, Bilston, WV14 9LJ.

We may need to verify your identity or ask for clarification before responding. We will respond within one month of receiving your request, unless an extension is permitted under data protection law.

Subject Access Requests

If you ask for a copy of the personal data we hold about you, this is called a Subject Access Request. We will provide the information we are legally required to share, unless an exemption applies, for example where disclosure would affect another person's rights and freedoms.

If you are acting on behalf of someone else, we will ask for evidence that you are authorised to do so. If your details do not match our records, we may request further information to confirm your identity.

Withdrawing consent may mean that a service can no longer continue. We may still retain certain information where we are required to do so by law, contract, legitimate business purposes, or retention requirements.

Who can I contact if I have a query or complaint?

If you have any questions, queries, or complaints about how Just Straight Talk handles your personal data, please contact Kate Beale, Data Protection Lead, at kate@juststraighttalk.org or by post to JST – The Hub, 30 Ebenezer Street, Bilston, WV14 9LJ.

- Email: kate@juststraighttalk.org
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You also have the right to raise concerns with the Information Commissioner's Office if you are unhappy with how your personal data has been handled.

Document owner and review

Kate Beale, Managing Director of Just Straight Talk, is the owner of this policy and is responsible for ensuring that it is reviewed periodically in accordance with JST's review requirements.

Updated: 20th July. Review date: July 2028.