

## MENTAL WELLBEING SERVICES UK LTD PRIVACY NOTICE

### INTRODUCTION

This privacy statement covers the use of our website, e-mails and text messaging services and how we process the personal information of those who we support and those who support our work. It includes information that we think would be useful to know about our website, internal record keeping and marketing communications. In particular:

### WHO WE ARE

Mental Wellbeing Services UK Limited is a privately owned company with strong values which underpin all the work we do with adults, be it therapeutic interventions or delivering mental health related support or training.

For the purposes of this website, our communications and our related internal record keeping, we are a 'data controller' relating to the Data Protection Act 1998 and from 25th May 2018 the EU General Data Protection Regulation 2016/679 ('Data Protection Law'). This means that we are responsible for and control the processing of your personal information.

If you would like further information about our privacy practices, please contact us by e-mailing: [info@mentalwellbeingservices.co.uk](mailto:info@mentalwellbeingservices.co.uk)

### HOW WE COLLECT INFORMATION ABOUT YOU

- *When you interact with us directly:* This could be if you register with us for an event, sign-up for a newsletter, apply for a job, apply to be a sub-contractor, apply to access one of our services or otherwise provide us with your personal information.

(It could also include if you work in professional services who we or our service users engage with.) This includes when you phone us, or get in touch through email, post, or in person or access any of the services that we provide.

- *When you interact with us through third parties:* For example, sign-up for training through event management platforms such as Eventbrite and give your permission for your personal information to be shared with us. This is also the case whereby your details are passed onto us through our referral systems in order that you can access our services. When you / we use the Mental Health First Aid England Online Learning Hub, or email, telephone or correspond with MHFA England CIC, for example when you contact us about products and services. – third party?
- *When you visit our website:* Through tools such as Google Analytics, we collect anonymous information which does not identify individual visitors to our website. We gather general information which might include those pages that are visited most often and we use this information to make improvements to our website and to ensure we provide the best service and experience for you. We also use ‘cookies’ to help our site run effectively. Please also see section ‘n’ below.
- We may also track which pages you visit when you click on links in marketing emails from us.

#### THE INFORMATION WE COLLECT

- Personal information such as name, postal address, phone number, email address, date of birth (where appropriate).
- Information about the support you need from us.
- Records of our work with you including any conversations or correspondence which is used in delivering our services to you.
- Special category information such as ethnic origin, religion etc. Sometimes we need emergency contact information and ask for this as part of our sign-up process.
- Non-personal information such as IP addresses (the location of the computer on the internet), pages accessed on the Mental Wellbeing Services UK Limited website and files downloaded. This helps us to determine how many people use our site, how they use it and how often. The information doesn’t tell us anything about who you are or where you live. This simply allows us to monitor and improve our services.

- We use **Pragmatic Tracker** where we store information about clients. It's a web-based outcome tracking tool for tracking change with clients in mental health treatment. Clients are referred to only by a pseudonym in order to protect their privacy. *Pragmatic Tracker* does not record any identifiable, personal information about clients other than their email address (which is stored in an encrypted format)

#### HOW WE USE YOUR INFORMATION

- To record the services that you have used, what we have done for you, how we helped and how you are when you stop using our services. We use this information to make sure we are delivering the best services that we can and we will share it with the places, such as our funders, prime contractors, so we can report back to them on the work that we have done. The information we share with these parties will always be anonymised.
- To record any contact that we have with you.
- To fulfil any requests that you might make.
- To send you information that we think will interest you but only if you have agreed that we can do this. (We will only use your information for marketing if you have agreed to it. For us to do this you must have opted-in.
- To provide personalised services to you when you visit our websites.
- To carry out analysis of the demographics, achievements and behaviour of our beneficiaries so that we can get a better understanding of what works for them so that we can improve our services.
- To process sales transactions, donations or any other payments and verify financial transactions.
- To detect or prevent fraud or abuse on any of our digital platforms and to all third parties who carry out technical and other functions for us.
- To communicate with our beneficiaries, commissioners and prime contract providers (see above).
- To understand how you use our website.

*a) Legal basis for using your information*

In most cases, we will only use your personal information where we have your permission or because we need to use it in order to fulfil a contract or an obligation.

However, there are other lawful reasons that allow us to process your personal information including 'legitimate interests'. This means that we are processing information because there is a legitimate reason for us to do so.

Whenever we process your personal information under the 'legitimate interest' lawful basis we make sure that we consider your rights and interests and will not process your personal information if we feel that there is an imbalance.

Further examples of where we have a legitimate interest to process your personal information include using it for analytical purposes, conducting research to better understand who our supporters are, for our legal purposes (for example, dealing with complaints and claims), and/or for financial reporting.

*b) Marketing communications*

In accordance with GDPR regulations we will only send you our marketing communications if you have agreed to receive these from us.

You can update your preferences or unsubscribe from these communications at any time by contacting [info@mentalwellbeingservices.co.uk](mailto:info@mentalwellbeingservices.co.uk) or clicking the unsubscribe/update your preferences link on our communications.

*c) Sharing your information*

We will never sell or share your personal information with organisations so that they can contact you for any marketing activities. Nor do we sell any information about your web browsing activity.

The personal information we collect from you will be used by our staff (directly employed and sub-contracted) so that we can support you or keep a record of the support you provide and your relationship to us.

We may however share your information with our trusted partners, sub-contractors and suppliers who work with us or on our behalf to deliver our services. The processing of this information is always carried out under our instruction.

*d) Legal disclosure*

We may disclose your information if required to do so by law (for example, to comply with applicable laws, regulations and codes of practice or in response to a valid request from a competent authority); or, in order to enforce our conditions of sale and other agreements.

*e) Keeping your information safe*

We take the security of your information very seriously and have implemented appropriate physical, technical and organisational measures to protect the personal information we have under our control (both on and off-line) from improper access, use, alteration, destruction and/or loss.

We use robust and appropriate, physical, technical and managerial controls to make sure we protect personal information provided to us, whether it's electronic or physical. Third Party providers we use include *Pragmatic Tracker* (see c) above) and One.com (see below).

Our emails are serviced by One.com who say they recognise the responsibility that comes with the hosting of personal data on customer's web space accounts and we consider One.com a trusted place for data storage.

In the unlikely event of a breach of our measures to keep personal information safe we will inform individuals 'without undue delay' where the breach could result in ID theft or fraud; physical harm; significant humiliation and/or damage to reputation. Such breaches will also be reported to the Information Commissioner's Office.

*f) How long we hold your information for*

We hold personal information for as long as is reasonable and necessary, which may be to fulfil statutory obligations or to help us understand our supporters and to keep a record of our relationship with you.

#### *g) Your rights*

You have the right to choose to restrict the collection or use of your personal information. It's important that you know your legal rights when it comes to the processing and control of your personal information. You should read the information provided at [www.knowyourprivacyrights.org](http://www.knowyourprivacyrights.org).

If you believe that any information we are holding on you is incorrect or incomplete, or if you have any concerns about how we hold or use your personal information, please email us as soon as possible at [info@mentalwellbeingservices.co.uk](mailto:info@mentalwellbeingservices.co.uk). We will promptly correct any information found to be incorrect or take the necessary action in line with our data protection policy to safeguard your personal information.

You have the right to request to see all the information we hold on you which we will provide within one calendar month, free of charge. This is called a Subject Access Request. To do this please email [info@mentalwellbeingservices.co.uk](mailto:info@mentalwellbeingservices.co.uk).

If you have concerns about how we manage or keep your data, you can contact our Data Protection Officer on [info@mentalwellbeingservices.co.uk](mailto:info@mentalwellbeingservices.co.uk). You can also report us directly to the Information Commissioner's Office <https://ico.org.uk/> who are the governing body for data protection.

#### *h) Our website*

We use a third-party service, WordPress Content Management System (CMS) to host the Mental Wellbeing Services UK Limited's website. No personal data is collected through this search function by us, WordPress, or any third party.

#### *i) Cookies*

We use cookies to improve our website for you, for example tools such as Google Analytics help us to measure general information such as the number of new and returning visitors, how many people use our website and how they use it. We do this to make sure our website is meeting users' needs and to help us understand how we could improve it.

You can find out how to control and delete cookies in your browser. Please note if you change your cookie preferences our website may not function for you as we would like it to. For further information about cookies please visit [www.allaboutcookies.org](http://www.allaboutcookies.org)

*j) Social media*

We have LinkedIn, Facebook, Twitter, Instagram and YouTube social media accounts.

If you message us via these platforms, we may need to pass the details to another department or manager within our organisation deal with your query appropriately. Once we have dealt with your question or concern, we will delete your message.

*k) People who e-mail us*

When you email us, whether via our website or otherwise, you need to be aware that this may not be secure and that any emails we send or receive may not be protected in transit, therefore you may wish to limit the information you provide.

We will also monitor any emails sent to us, including file attachments, for viruses or malicious software. Please be aware that you have a responsibility to ensure that any email you send is within the bounds of the law.

*l) Emails we send*

We use a secure service called ProtonMail which is an end-to-end encrypted email service. Proton Mail uses client-side encryption to protect email content and user data before they are sent to ProtonMail servers, unlike other common email providers such as Gmail and Outlook.com. We use ProtonMail for email based therapy, as well as for sending encrypted data to the health insurance company we use which includes people's personal identifiable information.

*m) Supporter communications*

If you choose to receive marketing communications from us, this would usually be in the form of our email newsletter. However, there may be some circumstances where we use other methods to contact you if you give us your permission to do so.

*n) Making a complaint*

For our full complaints procedure, please see our complaints policy: <http://mentalwellbeingservices.co.uk/our-policies> .

You can e-mail us on: [info@mentalwellbeingservices.co.uk](mailto:info@mentalwellbeingservices.co.uk).

**Sensitive Data** refers to data that includes details about your physical or mental health, ethnicity, religious or philosophical beliefs, sexual orientation, gender identity and trade union membership. We require your explicit consent for processing sensitive data, so when you submit your details you will be asked to provide your consent for this processing.

**Transferring your information outside of Europe**

As part of the services offered to you through this website, the information which you provide to us will not be transferred to countries outside of the European Economic Area 8. If you use our services while you are outside the EEA, your information may be transferred outside the EEA in order to provide you with those services.