

Mind With Heart Privacy Policy

1. Introduction

- 1.1. Mind With Heart Ltd (MWH) is committed to protecting your personal information and respecting your right to privacy. This Privacy Policy sets out how we collect, use and store your personal information, and how we keep it safe and secure.
- 1.2. For the purposes of applicable data protection legislation, the controller of your personal data is MWH. In this policy, MWH is referred to as “we”, “us” and “our”.
- 1.3. If you have any questions about our Privacy Policy, please get in touch using the details below (see section 12 of this Privacy Policy).

2. How we collect information about you

2.1. When you directly give us information

We may collect and store information when you interact with us directly. This could be when you:

- (a) get in touch via phone, email, post, in person, website, social media platforms or other method of communication;
- (b) support our work with a donation;
- (c) submit an enquiry;
- (d) sign up to our email list;
- (e) register for our training or an event;
- (f) complete a pre-programme onboarding questionnaire;
- (g) participate in our trainings;
- (h) apply for a volunteering or employment opportunity;
- (i) complete surveys or provide feedback;
- (j) participate in a research interview or focus group;
- (k) make a complaint; or
- (l) otherwise provide us with your personal information.

2.2. When you indirectly give us information

- (a) When you interact with us on social media platforms such as Facebook, Twitter or LinkedIn we may also obtain some personal information about you.
 - (i) The information we receive will depend on the privacy preferences you have set on each platform and the privacy policies of each platform.
 - (ii) To change your settings on these platforms, please refer to their privacy notices. You should be aware that MWH has no ownership over these websites who may process your data for their own purposes if you choose to use them.

- (b) We may also obtain some personal information about you when you interact with (such as following links within) our emails.
- (c) We may obtain information about your visit to our site, for example the pages you visit and how you navigate the site, by using cookies. Please see below for information on this.

2.3. When you give permission to other parties to share it with us

- (a) Your information might be shared with us by fundraising sites such as KindLink, The Good Exchange, Givey, Just Giving or Global Giving.
- (b) These independent third parties will only share your personal information with us when you have indicated that you wish to support MWH, and only with your explicit consent.
- (c) You should check the relevant third party's privacy policy when you provide your information to that third party, to understand fully how they will process your information.

3. What information we collect

3.1. The personal information we collect may include:

- (a) Name.
- (b) Address and postcode.
- (c) Contact information including email address and phone number.
- (d) Job title and organisation.
- (e) Information you share with us on pre-training screening questionnaires, training feedback questionnaires, research questionnaires, research interviews and focus groups, which may include personal information relating to your health with your explicit consent (and your guardian's permission if you are aged 16 or under).
- (f) With your explicit consent (and your guardian's permission if you are aged 16 or under), we may also collect personal information relating to your health, if you choose to tell us about your experiences relating to our services for use in a case study, or in promotional materials.
- (g) Usage data including how you use and interact with our products and services.
- (h) Videos and photographs.
- (i) Other information you provide in any communications between you and us.

4. What we do with the information we collect

4.1. We will use your personal information for the following purposes:

- (a) Respond to your query.
- (b) Process your order for services or products.
- (c) Update you with important administrative messages about services or products you have requested.

- (d) Invite you to participate in market surveys or research.
 - (e) Use anonymised feedback on our websites and social media, as testimonials about our trainings.
 - (f) Include photographs and videos on social media platforms and campaigns with your explicit permission, and your guardian's permission for those aged 16 and under.
 - (g) Customise our website according to your interests.
 - (h) Internal record keeping.
 - (i) Process your donation and claim gift-aid.
 - (j) Process your application to work or volunteer with us.
 - (k) Contact you by email or phone.
 - (l) We may process your personal information where we reasonably think there is a risk of serious harm or abuse to you or someone else.
 - (m) We may process your personal information to fulfil a legal obligation.
 - (n) We may use your personal information to improve our products and services.
 - (o) We may periodically send promotional emails about new services, special offers, fund-raising or other information which we think you may find interesting using the email address which you have provided.
- 4.2. We will use your personal information related to your health (including information regarding your mental wellbeing) only for the following purposes and where we have your explicit consent to do so:
- (a) For the purposes of onboarding and gating/matching you with suitable programmes as a participant.
 - (b) For the purposes of understanding your experience of our products and services, including for the purposes of handling any complaints or wellbeing concerns.

5. **Lawful basis for processing your data**

- 5.1. We will only process your personal information where we have a legal basis on which to do so. Generally, we will process your personal information where:
- (a) It is necessary for the purposes of the legitimate interests pursued by us or by a third party, except where such interests are overridden by your interests or fundamental rights and freedoms which require protection of personal information. We will always consider if it is fair and balanced to do so and if it is within your reasonable expectations. We will balance your rights and our legitimate interests to ensure that we use your personal information in ways that are not unduly intrusive or unfair:
 - (i) ensuring we are providing services effectively;
 - (ii) ensuring proper oversight of our finances; and

- (iii) effectively recruiting and ensuring that volunteer placements are properly administered;
 - (b) It is necessary for the performance of a contract to which you are a party or in order to take steps at your request prior to entering into a contract;
 - (c) It is necessary for compliance with a legal obligation to which we are subject; or
 - (d) You have given consent to the processing of your personal information for one or more specific purposes.
- 5.2. In more limited circumstances, we may process your personal information where:
- (a) It is necessary in order to protect your vital interests; or
 - (b) It is necessary for the performance of a task carried out in the public interest.
- 5.3. We will process personal information revealing or concerning your health only where you have given us explicit consent to do so, and then only for the purposes for which you have given your explicit consent.
- 5.4. Please note that where we require your personal information to perform a contractual or other legal obligation, we may be unable to perform that obligation if you do not provide that personal information.

6. Who we share your personal information with

6.1. Data sharing with third parties

- (a) Where we have a legal basis on which to do so, we may share your personal information with third parties. We will use your information only for the purposes for which it was obtained or a compatible purpose.
- (b) These third parties include:
 - (i) Service providers acting as a data processor for the facilitation of our online marketing processes.
 - (ii) Service providers acting as data processors, who provide data hosting facilities, IT and system administration services.
 - (iii) Payment processors and financial institutions that process donations and payments.
 - (iv) Regulators and governmental bodies where we have a legal duty to do so.
- (c) We require all third parties to respect the security of your personal information and to treat it in accordance with the law.

6.2. Data transfers to third countries

- (a) The personal information we collect from you may, on occasion, be transferred to a destination outside the UK or the European Economic Area (EEA). It may also be used by organisations operating outside the UK or the EEA who provide services to us.
- (b) Where we transfer your personal information to a destination outside the UK or the EEA that has not been found (for the purposes of applicable data protection legislation) to provide an adequate level of protection for personal information, we will take steps

reasonably necessary to ensure there is an adequate level of protection of your personal information and that your personal information is treated securely and in accordance with this Privacy Policy.

7. How we protect your information

7.1. We are committed to ensuring that your information is secure.

- (a) We limit access to information on a need-to-know basis, and ensure that our people are aware that such information is only used in accordance with this Privacy Policy.
- (b) In order to prevent unauthorised access or disclosure, we have put in place physical, electronic and managerial procedures to safeguard and secure the personal information we collect online.
- (c) All devices storing personal information are password protected.

7.2. Questionnaires, feedback, interviews, videos, photos

- (a) Pre-training screening questionnaires will be deleted once the training has commenced.
- (b) Other electronic forms with personal information such as training feedback, records of interviews and focus groups, and research questionnaires will be anonymised once the training or research project has ended.
- (c) Videos and photographs will be securely stored online, in accordance with section 8 of this Privacy Policy, unless you request otherwise (see section 12 of this Privacy Policy).

7.3. Please be aware that there are always inherent risks in sending information by public networks or using public computers and we cannot 100% guarantee the security of data (including personal information) disclosed or transmitted over public networks. If you suspect any misuse or loss of or unauthorised access to your personal information please get in touch using the details below (see section 12 of this Privacy Policy).

8. How long we keep your information

8.1. We only keep your personal information for as long as is reasonable and necessary for the relevant activity, which may be to fulfil statutory obligations.

8.2. We will keep your personal information in respect of financial transactions for as long as the law requires us to for tax or accounting purposes (which may be up to seven years after a particular transaction).

8.3. If you request that we stop processing your personal information for the purpose of marketing we may in some instances need to add your details to a suppression file to enable us to comply with your request not to be contacted.

8.4. In the case of people applying for jobs or volunteer roles at MWH, all information collected on applicants will be permanently deleted after 2 years from the last applications submitted.

8.5. Where you have provided your name on a paper-based feedback form or research questionnaire, we will remove your name once the training or research project has ended.

9. Website Cookies

9.1. Cookies are simple text files that typically contain two pieces of information: a site name and unique user ID. When you visit a site that uses cookies for the first time, a cookie is

downloaded onto your computer. The next time you visit that site, your computer checks to see if it has a cookie that is relevant (that is, one containing the site name) and sends the information back to the site. The site then 'knows' that you have been there before, and in some cases, tailors what pops up on screen to take account of that fact.

- 9.2. As a rule, cookies will make your browsing experience better. However, you may prefer to disable cookies on this site and on others. The most effective way to do this is to disable cookies in your browser. We suggest consulting the Help section of your browser or taking a look at the [About Cookies website](#) which offers guidance for all modern browsers.

10. **Google Analytics**

- 10.1. When someone visits our website we use a third party service, Google Analytics, to collect standard internet log information and details of visitor behaviour patterns.
- 10.2. We do this to find out things such as the number of visitors to the various parts of the site.
- 10.3. This information is anonymous and we do not make, and do not allow Google to make, any attempt to find out the identities of those visiting our website.

11. **Mailing Lists**

- 11.1. We collect email addresses in order to let you know about upcoming events and courses, special offers and other MWH-related news. We do not rent or trade email lists with other organisations and businesses.
- 11.2. We use a third-party provider, MailChimp, to deliver our emails. We gather statistics around email opening and clicks to help us monitor and improve our emails. For more information, please see [MailChimp's privacy notice](#).
- 11.3. You can unsubscribe to general mailings at any time by clicking the unsubscribe link at the bottom of any of our emails or by emailing us at info@mindwithheart.org

12. **Your rights**

- 12.1. You have various rights in respect of the personal information we hold about you – these are set out below:
 - (a) **Access to your personal information:** You are entitled to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.
 - (b) **Right to rectification:** You can ask us to change or complete any inaccurate or incomplete personal information held about you.
 - (c) **Right to erasure:** You can ask us to delete your personal information in certain circumstances, including where it is no longer necessary for us to use it, you have withdrawn consent, or where we have no lawful basis for keeping it.
 - (d) **Right to restrict processing:** You can ask us to restrict processing your personal information in certain circumstances, including when you have issues with the accuracy of the information or the way we are processing it.
 - (e) **Right to object:** You can object to our processing of your personal information where we are relying on a legitimate interest (or those of a third party) and there is something

about your particular situation which makes you want to object to processing on this ground. You also have the right to object where we are processing your personal information for direct marketing purposes. Please contact us as noted above, providing details of your objection.

- (f) **Right of data portability:** Where our legal basis for processing personal information that you have provided to us is consent or for the performance of a contract with you, and where we are processing that personal information by automated means, you can ask us to provide you or a third party with the personal information that we hold about you in a structured, commonly used, electronic form, so it can be easily transferred.
 - (g) **Right to withdraw consent:** If you have given us your consent to use personal information (for example, for marketing), you can withdraw your consent at any time
 - (h) **Right to lodge a complaint with a supervisory authority:** You have the right to report concerns, or complain about our handling of your data to the applicable supervisory authority, in the place of your habitual residence, place of work or place of the alleged infringement. The supervisory authority in the UK is the Information Commissioner's Office. Details of how to do this can be found on its website.
- 12.2. To exercise any of these rights, please get in touch using the details below (see section 12 of this Privacy Policy).
- 12.3. Data protection regulations give you clear rights over how your data is used by us. You can find out more detail about your rights by visiting the Information Commissioner's Office website's section on individual rights.
- 12.4. We have appointed a data protection officer (DPO) to oversee compliance with this privacy notice. If you have any questions about this privacy notice or how we handle your personal information, please contact the DPO, using our email below.
- 12.5. If you would like more information, or have any questions about this Privacy Policy, or to make a formal complaint about our approach to data protection or raise privacy concerns please contact us.
- 12.6. You have the right to make a complaint at any time to a supervisory authority.

13. **Contact Us**

Post: 24 Legion Close, London, N1 1PJ

Email: info@mindwithheart.org

Telephone: +44 (0) 7380 947 498

Date policy reviewed: [21 Mar 2022]

Date next review due: [21 Mar 2024]