



## Privacy Policy

Washington Mind has a strong commitment to continually improve our levels of service. To help us achieve this we may collect and process information about you.

### Summary

We will collect and otherwise use personal information about you to enable us to administer our services (as detailed below), to provide you with other relevant services and to help us continue to manage our relationship with you. The data we collect will be as minimal as possible and only relevant to the relationship with Washington Mind.

This Privacy Notice describes in detail how we will use your personal information, what your rights are in relation to personal information and how you can exercise those rights.

### Introduction

In this Privacy Notice:

- **we, us or our** (or similar words) means Washington Mind;
- **you** means the person whose personal information (as defined below);
- **service** means the service within our Charity you are associated with;
- **third parties** means anyone who we may share your personal information with; and
- **Website** means [www.washingtonmind.org.uk](http://www.washingtonmind.org.uk) [www.wellbeinginfo.org.uk](http://www.wellbeinginfo.org.uk)

We are committed to protecting your privacy. We will only use your personal information in accordance the Data Protection Act 1998 (the **DPA**), the General Data Protection Regulation (the **GDPR**) and any other laws that set out how we can use your personal data.

### Which services do we offer?

We are a mental health charity offering multiple services to support children with and adults, which are divided into the following categories. This list may change as our services develop.

- **adult services** (including therapies and counselling);
- **Young people** (including therapies and counselling);

- **fundraising**; and
- **central services** (including finance and HR).

**Who is responsible for your personal information?** We control the information that is collected by us about you and the purposes for which we use that information. This means that Washington Mind is the **data controller** (for the purposes of both the DPA and GDPR) in respect of such personal information.

### **What is our legal basis for processing your personal information?**

At the point we collect your personal information we will advise you of our legal basis for the processing and direct you to this full Privacy Notice. This means we will never process your data without a legal basis to do so.

Our legal basis for processing will differ from service to service, but likely to fall into the following categories;

**Adult/Young People Services** - *processing is necessary for the **performance of a contract** with you (or to take steps to enter into a contract), or, processing is necessary for **compliance** with a legal obligation, or, processing is necessary to **protect the vital interests** of you (or other person), or, necessary **legitimate interest** pursued by us, or a third party.*

**Addition (special) category for our legal basis may be;** *Processing is necessary to protect the vital interests of you or another individual where you are physically or legally incapable of giving consent.*

**Fundraising** - *necessary **legitimate interest** pursued by us, or a third party, or through **consent** by you to process your personal information.*

**Addition (special) category for our legal basis may be;** *Processing relates to personal data manifestly made public by you.*

**Central services** - *processing is necessary for **compliance** with a legal obligation, or, processing is necessary for the **performance of a contract** with you (or to take steps to enter into a contract).*

**Addition (special) category for our legal basis may be;** *Processing is necessary for carrying out obligations under employment, social security or social protection law, or a collective agreement.*

**Charity wide** - *necessary **legitimate interest** pursued by us, or a third party, for instance, the use of CCTV.*

### **What information does Washington Mind collect?**

If you are unsure about any of these categories, or you are concerned regarding our legal basis for processing your personal information, please contact us via the contact information later in this Notice.

At the point we collect your personal information we will advise you of the exact **purpose why** we are collecting your information and direct you to this full Privacy Notice. This means we will not collect personal information for one purpose and then use it for another.

The collection of information will differ from service to service, but mainly consist of your name, address, contact details (including email address and mobile phone number).

Data collection is different when referring into our service and more sensitive information is needed, this will be explained to you at your referral/triage appointment.

We may also require other professionals/organisations connected to you and emergency contact details.

In some instances, we may require financially related information, for instance, a credit card number or bank account details.

If we are collecting your data for employment purposes, we may also request copies of your qualifications or achievements to date. We will hold internal records on our staff, including full Disclosure and Barring Service (DBS) checks

During fundraising events if you consent to give us your contact details we will retain those and use your contact details to contact you for the agreed marketing purposes via your preferred method of communication.

In addition, we may collect the following personal information about you:

Information contained in and records of communications between us, including emails, letters and text messages.

- data collected as part of any documents you manually or electronically complete, or online services to which you subscribe;
- CCTV footage in which you may feature if you visit our services/ premises;
- Information about your preferences in connection with our Website, for the purposes of enhancing and personalising your experience on the Website;
- details of your visits to our Website, for example traffic data, location data, such as IP Address and the resources that you access (including the pages of our Website that you viewed); and
- information concerning your marketing preferences.
- Photographs

If you provide us with personal information about another individual (unless legally able to do so), you must ensure that before you provide us with their personal information, you have their agreement to do so and that they are aware of the ways in which we will use their personal information as set out in this Privacy Notice.

## **How do we use your personal information?**

We may use your personal information:

- to carry out our obligations arising from any contracts entered into between you and us;
- to comply with our legal obligations and with instructions from a regulatory body
- to manage and administer the relation between you and us;
- to notify you about changes to our services and to otherwise communicate with you, for example, we will use your contact details in order to respond to any queries that you may submit to us.

## **With whom do we share your personal information?**

Sharing information between partner organisations is vital to the provision of co-ordinated and seamless services where Washington Mind's work is delivered in partnership with other organisations. In addition, the sharing of information can help to meet the requirements of statutory and local initiatives. However any decisions to share information, particularly personal data, must be based on an appropriate risk assessment and the basis for lawful sharing agreed.

For instance, we *may* pass your personal information to:

- additional organisations who may provide you with additional/or be involved in your support
- external agencies and organisations (including the police and other law enforcement agencies) for the purpose of preventing and detecting fraud (including fraudulent transactions) and criminal activity. We may also disclose personal information to the police and other law enforcement agencies in connection with the prevention and detection of crime;

If you are concerned or have any questions about who we may share your personal information with, please contact us via the contact information further on in this Notice.

## **Transfers outside the EEA (European Economic Area)**

We do not currently transfer your personal data outside the EEA, with the exception of our fundraising service that at times uses a third-party service provider (Mail Chimp) who are based in the United States (US). We have safeguarding reassurances as Mail Chimp is covered by Privacy Shield, who is recognised by the ICO as providing adequate security in the US.

## Protecting your personal information

We regularly review and continually improve our data security measures to reduce any risk of data loss, or data breaches. This includes but is not limited to; the use of fire walls, the use of anti-virus software, regular backups of our data. We also have a data breach plan and procedure to follow in the event of any data breach, to minimise any potential impact to you.

Our security procedures mean that we will not disclose your personal information to any unknown third party without first gaining your consent to do so, unless for some legal exemptions. At times we may also need to validate we are speaking to the right person, therefore we may request proof of your identity before are able to disclose personal information to you.

The transmission of information via the internet is not completely secure; this risk is not specific to our Website and is common across the internet. Unfortunately, we cannot guarantee the security of the transmission of the data to which is outside our control; any data you send is at your own risk. However, to reduce this risk our internal procedures requires staff that need to send sensitive personal data outside our network, do so with strict controls on encryption and password protection.

## How long will Washington Mind keep your information?

We will not store your personal information for longer than is necessary for the purposes of processing. This means after we process your personal information, we will securely destroy your personal information from our records, based on our own internal processes.

In line with GDPR, we will only further retain your personal information for a regulatory, legal or a specific business purpose, in line with our Data Retention Guidance.

If you require specific retention schedules for your personal information, please contact us using the contact details further on in this Notice.

## What rights do you have?

By providing you with this Privacy Notice we are ensuring that you have been fully and clearly informed about our fair processing information, in relation to how we use your personal information.

You have the **right to object** to our processing of your personal information if you feel; our legal basis for the processing is incorrect.

If you think any of the personal information we hold about you is **inaccurate or incorrect**, you can request that we correct this information.

If you feel there is no compelling reason for the continued processing of your personal information. You can request that it is **erased** (through deletion or removal) from our systems.

In certain circumstances you may wish to request that we **restrict processing** of your personal information, we will usually do this through suppressing the information we hold.

For any of the above concerns please use the contact information below, we will respond to you within **1 month** from the date of receiving your query.

If you wish to obtain and be able to reuse any of the personal information we hold about you (**data portability**) please contact us to discuss further.

You can also choose to stop receiving **direct marketing**:

Marketing emails from us by following the unsubscribe link and instructions on the respective marketing emails we send you; and  
telephone calls or postal communications by notice using the contact information below.

Any request to stop receiving direct marketing will be actioned within **28 days** of your request, during this time you may still receive marketing from us.

### **Access to your personal information**

Both the DPA and GDPR give you the right to access your personal information, subject to certain exemptions. To request access to your personal information, please contact us using the contact information below, including a completed Request for Access to Personal Information Form.

We will respond to you within **1 month** from the date of receiving your query. If your request is more complex in nature we may extend our response by a **further 2 months** but will keep you informed.

While we are mindful that the GDPR has introduced a new best practice recommendation that, where possible, organisations should provide **remote access** to a secure self-service system which would provide you with direct access to your personal information, unfortunately due to the nature of the varied information we hold across our services at this time we are unable to offer this service.

### **Gift Aid**

If you have consented us to claim Gift Aid back on your donation(s), it is your responsibility to let us know if your tax status has changed when you make any further donations, or if you wish to cancel the declaration. You can do so by contacting [info@washingtonminfd.org.uk](mailto:info@washingtonminfd.org.uk) telling us your name, address and new status. You must also inform us if any of your details have changed. You must have paid or will pay an amount of income tax and/or capital gains tax for year tax year that is at least equal to the amount of tax that the charity will reclaim on your gifts for that tax year. If you pay less tax than the amount of Gift Aid that is claimed, it is your responsibility to pay the difference. We may hold gift aid declarations for all donations for statutory requirement purposes (required for HMRC gift aid claim).

**Cookies** These are small files that are widely used in order to make websites work more efficiently. Most web browsers allow some control of cookies through browser settings. To find out more about cookies, including how to see what cookies have been set and how to manage or delete them from your computer, visit [www.allaboutcookies.org](http://www.allaboutcookies.org).

### **How to contact us**

If you have any questions, comments or requests regarding this Privacy Notice, please contact us in either of the following ways:

- by writing to The Business Support Manager at Washington Mind, The Life House, Grasmere Terrace, Columbia, Washington, NE38 7LP
- by emailing us at [info@washingtonmind.org.uk](mailto:info@washingtonmind.org.uk)

Please mark correspondence with the title; **Data Protection Query**.

### **How to complain**

Any dissatisfaction relating to our handling of your personal information should be brought to our attention using the contact information above.