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Privacy Policy and Notice

1. Introduction

- 1.1 We want everyone who supports us, or who comes to us for support, to feel confident and comfortable with how any personal information you share with us will be looked after or used. This Privacy Policy and Notice sets out how we collect, use and store your personal information (this means any information that identifies or could identify you).
- 1.2 This Privacy Policy and Notice may change so please remember to check back on our website from time to time, this is version 5 and was last updated on 12 October 2022.
- 1.3 This Policy will be reviewed annually, or sooner if required, and amendments made as necessary. All policy documents are ratified by our Board of Trustees.

2. Who we are

- 2.1 At Rochdale and District Mind, we are committed to protecting your personal information and making every effort to ensure that your personal information is processed in a fair, open and transparent manner.
- 2.2 Rochdale and District Mind is a "data controller" for the purposes of the Data Protection Act 2018 and the General Data Protection Regulations ('Data Protection Law'). This means that we are responsible for, and control the processing of, your personal information.
- 2.3 For further information about our privacy practices, please contact our Data Protection Officer by:
 - 2.3.1 Writing to Rochdale and District Mind, 3-11 Drake Street, Rochdale, OL16 1RE;
 - 2.3.2 Calling us on 01706 752 333; or
 - 2.3.3 Emailing management@rochdalemind.org.uk.

3. How we collect information about you

- 3.1 Everything we do, we do to ensure that we can help people experiencing a mental health and emotional wellbeing problem get both support and respect. We want to make sure you receive the communications that are most relevant to you, be it through visiting our website, interacting with us on social media or receiving emails, post or phone calls. We want to make sure you receive the best attention when you book on an event, use our services or make a donation.
- 3.2 We collect information from you in the following ways:
- 3.2.1 **When you interact with us directly:** This could be if you ask us about our activities, wish to use our support services, register with us for training or an event, make a donation to us, ask a question about mental health and emotional wellbeing, apply for a job or volunteering opportunity or otherwise provide us with your personal information. This includes when you phone us, visit our website, interact with us on social media, get in touch through the post, or in person.
- 3.2.2 **When you interact with us through third parties:** This could be if you provide a donation through a third party such as Just Giving, BT Donate or one of the other third parties that we work with and provide your consent for your personal information to be shared with us.
- 3.2.3 **When you visit our website:** We gather general information which might include which pages you visit most often and which services, events or information is of most interest to you. We may also track which pages you visit when you click on links in emails from us. We also use "cookies" to help our site run effectively. There are more details below – see 'Cookies'. We use this information to personalise the way our website is presented when you visit to make improvements and to ensure we provide the best service and experience for you. Wherever possible we use anonymous information which does not identify individual visitors to our website.

4. Information we collect and why we use it

- 4.1 **Personal information** we collect includes details such as your name, date of birth, e-mail address, postal address, telephone number, as well as information you provide in any communications between us. You will have given us this information whilst making a donation, registering for an event,

filling in an on-line referral for support services via our website or any of the other ways to interact with us.

4.2 We will mainly use this information:

4.2.1 to process your donations or other payments, to claim Gift Aid on your donations and verify any financial transactions;

4.2.2 to provide the services that you have requested;

4.2.3 to update you with important administrative messages about your donation, services you have requested or an event that you have registered for;

4.2.4 to comply with the Charities (Protection and Social Investment) Act 2016 and follow the recommendations of the official regulator of charities, the Charity Commission, which require us to identify and verify the identity of supporters who make major gifts so we can assess any risks associated with accepting their donations;

4.2.5 to keep a record of your relationship with us; and

4.2.6 where you volunteer with us, to administer the volunteering arrangement.

4.3 If you do not provide this information, we will not be able to process your donation, sign you up for a particular event or provide the services you have requested.

4.4 We may also use your personal information:

4.4.1 to contact you about our work and how you can support Rochdale and District Mind (see section 8 on 'Marketing' below for further information); and

4.4.2 to invite you to participate in surveys or research.

5. Sensitive Personal Information

5.1 If you share your personal experience or the experiences of a friend or relative, we may also collect this health information. If you provide us with any Sensitive Personal Information by telephone, email or by other means, we will treat that information with extra care and confidentiality and always in accordance with this Privacy Policy.

5.2 We may request your consent to share your personal details with Rochdale and District Mind staff members or share your story with the media or other parties as part of our work telling people's personal stories about mental

health and emotional wellbeing (for example, social media). You can of course decide to withhold consent, or decide to have your information anonymised.

5.3 A special note about the Sensitive Personal Information we hold

5.3.1 Data Protection Law recognises that some categories of personal information are more sensitive. Sensitive Personal Information can include information about a person's health, race, ethnic origin, political opinions, Trade Union membership, sex life, sexual orientation or religious beliefs.

5.3.2 If you contact us at Rochdale and District Mind through our Helpline, or in other more general communications such as e-mails, you may choose to provide details of a sensitive nature.

5.3.3 We will only use this information in the following ways:

5.3.3.1 for the purposes of dealing with your enquiry, training, and quality monitoring or evaluating the services we provide.

5.3.3.2 we will not pass on your details to anyone else without your express consent except in exceptional circumstances. Examples of this might include anyone reporting serious self-harm or posing a threat to others or children, contacting us and sharing serious issues such as physical abuse or exploitation.

5.3.3.3 where you have given us your express consent or otherwise clearly indicated to us that you are happy for us to share your story, then we may publish it (for example, on our website, annual report or e bulletin).

6. Information about children and young people

6.1 Wherever possible, we will ask for consent from parents / guardians to collect information about children and young people under the age of 16. We have policies in place to protect children and young people and their rights and ability to consent. For more information please contact our management team at management@rochdalemind.org.uk or by telephone 01706 752 333.

7. Legal basis for using your information

7.1 In some cases, we will only use your personal information where we have your consent or because we need to use it in order to fulfil a contract with you (for example to receive our e bulletin).

- 7.2 However, there are other lawful reasons that allow us to process your personal information and one of those is called 'legitimate interests'. This means that the reason that we are processing information is because there is a legitimate interest for Rochdale and District Mind to process your information to help us to achieve our vision of ensuring that everyone experiencing a mental health and emotional wellbeing problem gets both support and respect.
- 7.3 Whenever we process your Personal Information under the 'legitimate interest' lawful basis we make sure that we take into account your rights and interests and will not process your personal information if we feel that there is an imbalance.
- 7.4 Some examples of where we have a legitimate interest to process your Personal Information are where we contact you about our work via post or text, use your Personal Information for data analytics, conducting research to better understand who our supporters are, improving our services, for our legal purposes (for example, dealing with complaints and claims), or for complying with guidance from the Charity Commission or National Mind.

8. Marketing

- 8.1 We will only contact you about our work and how you can support Rochdale and District Mind by phone, email, via social media or by text message, if you have agreed for us to contact you in this manner. However, if you have provided us with your postal address we may send you information about our work and how you can support Rochdale and District Mind by mail unless you have told us that you would prefer not to hear from us in that way.
- 8.2 You can update your choices or stop us sending you these communications at any time by emailing unsubscribe@rochdalemind.org.uk or telephoning us on 01706 752 330.

9. Sharing your Information

- 9.1 The personal information we collect about you will mainly be used by our staff (and volunteers) at Rochdale and District Mind so that they can support you.
- 9.2 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.
- 9.3 Rochdale and District Mind may however share your information with our trusted partners and suppliers who work with us or on our behalf to deliver our services, but processing of this information is always carried out under

our instruction. We make sure that they store the data securely, delete it when they no longer need it and never use it for any other purposes. An example of where we may share your information is with our partners who help us to manage our database and ICT systems.

- 9.4 Where we employ external organisations to provide us with services (for example ICT support), we enter into contracts which require them to comply with Data Protection Laws and ensure that they have appropriate controls in place to secure your information.
- 9.5 Some of our services are delivered in partnership with other organisations, for example Thinking Ahead, #Thrive and Mind in Greater Manchester. If you access these services, your personal details will be shared with the other organisation/s to allow us to provide you with these services.
- 9.6 **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.

10. Keeping your information safe

- 10.1 We take looking after your information very seriously. We've 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 loss.
- 10.2 Unfortunately the transmission of information using the internet is not completely secure. Although we do our best to protect your personal information sent to us this way, we cannot guarantee the security of data transmitted to our site.
- 10.3 Our website may contain links to other sites. While we try to link only to sites that share our high standards and respect for privacy, we are not responsible for the content or the privacy practices employed by other sites. Please be aware that advertisers or websites that have links on our site may collect personally identifiable information about you. This privacy statement does not cover the information practices of those websites or advertisers.

11. How long we hold your information for

- 11.1 We keep some information such as who we have provided support to and financial accounts for up to 7 years. In principle we only keep information as long as is reasonable and necessary for the relevant activity, which may be to fulfil statutory obligations.

12. Your rights

12.1 You have various rights in respect of the personal information we hold about you – these are set out in more detail below. If you wish to exercise any of these rights or make a complaint, you can do so by contacting our management office by email: management@rochdalemind.org.uk or by telephone 01706 752 333. You can also make a complaint to the data protection supervisory authority, the Information Commissioner's Office, <https://ico.org.uk/>.

12.2 Access to your personal information:

12.2.1 You have the right to request access to a copy of the personal information that we hold about you, along with information on what personal information we use, why we use it, who we share it with, how long we keep it for and whether it has been used for any automated decision making. You can make a request for access free of charge. Please make all requests for access in writing using our Subject Access Request form and provide us with evidence of your identity. The contact details to use are: Data Protection Officer, Rochdale and District Mind, The Mind Wellbeing Centre, 3-11 Drake Street, Rochdale OL16 1RE or info@rochdalemind.org.uk. Where the SAR request creates a task for our administrator we may charge a reasonable fee for this administrative cost and / or if further copies are requested.

12.2.2 Parents / guardians do not have an automatic right to view their child's records. Young people aged 13 and over are usually considered competent to make a decision regarding giving permission to view records. When parents / guardians ask for copies of notes, evidence that they have parental responsibility will need to be produced and the request will need to be made in writing and in line with Rochdale and District Mind's Subject Access Request procedure.

12.3 **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.

- 12.4 **Consent:** If you have given us your consent to use personal information (for example, for marketing), you can withdraw your consent at any time.
- 12.5 **Rectification:** You can ask us to change or complete any inaccurate or incomplete personal information held about you.
- 12.6 **Erasure:** You can ask us to delete your personal information where it is no longer necessary for us to use it, or you have withdrawn consent, or where we have no lawful basis for keeping it.
- 12.7 **Portability:** You can ask us to provide you or a third party with some of the personal information that we hold about you in a structured, commonly used, electronic form, so it can be easily transferred.
- 12.8 **Restriction:** You can ask us to restrict the personal information we use about you where you have asked for it to be erased or where you have objected to our use of it.
- 12.9 **No automated-decision making:** Automated decision-making takes place when an electronic system uses personal information to make a decision without human intervention. You have the right not to be subject to automated decisions that will create legal effects or have a similar significant impact on you, unless you have given us your consent, it is necessary for a contract between you and us or is otherwise permitted by law. You also have certain rights to challenge decisions made about you. We do not currently carry out any automated decision-making.
- 12.10 Please note, some of these rights only apply in certain circumstances, where one of your rights does not apply, we will communicate the reason to you.

13. Cookies

- 13.1 'Cookie' is a name for a small file, usually of letters and numbers, which is downloaded onto your device, like your computer, mobile phone or tablet when you visit a website. They let websites recognise your device, so that the sites can work more effectively, and also gather information about how you use the site. A cookie, by itself, can't be used to identify you.
- 13.2 **How do we use cookies?** We use cookies to distinguish you from other users of our website. This helps us to provide you with a good experience when you come to our website and also allows us to improve the user experience.
- 13.3 **The cookies we use.** We use the categorisation set out by the International Chamber of Commerce in their UK Cookie Guide. We use all four categories of cookies:

- 13.3.1 Strictly necessary cookies are essential for you to move around our website and to use its features, like our shopping basket and your account.
- 13.3.2 Performance cookies collect anonymous information about how you use our site, like which pages are visited most.
- 13.3.3 Functionality cookies collect anonymous information that remember choices you make to improve your experience, like your text size or location. They may also be used to provide services you have asked for such as watching a video or commenting on a blog.
- 13.3.4 Targeting or advertising cookies collect information about your browsing habits in order to make advertising relevant to you and your interests. As such if you visit the Rochdale and District Mind website you may then be more likely to see adverts about Mind's work on other websites as your browsing suggests that this is an area of interest.

13.4 **No cookies, please**

- 13.4.1 You can opt out of all of our cookies (except the strictly necessary ones). [Find out how to control and delete cookies in your browser.](#) But, if you choose to refuse all cookies, our website may not function for you as we would like it to.
- 13.4.2 If you have any questions about how we use cookies, please [contact us](#).