self management uk

**PRIVACY POLICY** 

**VERSION 2.0** 

www.selfmanagementuk.org

# CONTENTS

Authors
Version History
Next Review Date
Approvals3
Sign Off3
Privacy policy4
1. Introduction
2. About Self management uk4
3. how we collect information about you4
4. Information We Collect And Why We Use It5
5. LEGAL basis for using your information6
6. Marketing6
7. Sharing Your Information7
8. Keeping Your Information Safe
9. How Long We Hold Information For7
10. Legislation and statutory requirements8
11. Cookies9

## AUTHORS

This document was prepared by:

Name, Title: Ian Silver Organization: self management UK Address: Suite 409, Chadwick House, Birchwood, Warrington, WA3 6AE Office Phone: 0333445840 Email Address: ian.silver@selfmanagementuk.org

# VERSION HISTORY

Date	Document Version	Changes Made	Author / Reviser
	Draft	Initial Draft	
18 <sup>th</sup> May 2018	1.0	GDPR Updates	SB
20 <sup>th</sup> Feb 2019	2.0	Further review	LS
5 <sup>th</sup> May 2021	3.0	Review	IS

# NEXT REVIEW DATE

Date to be Reviewed	Reviewed By:	Comments:	Reviewer Initials
20 <sup>th</sup> Feb 2020	LS		LS
5 <sup>th</sup> May 2021	IS	Policy Review	IS

# APPROVALS

Date	Document Version	Changes Made	Approver Initials
	Draft	Initial Draft	
5 <sup>th</sup> May 2021	Final	Reviewed	IS

# SIGN OFF

Signature:	OS tusos
Name:	lan Silver, Chief Executive
Date:	5 <sup>th</sup> May 2021

## **PRIVACY POLICY**

## 1. INTRODUCTION

At Self management UK we are committed to protecting your personal information and making every effort to ensure that your personal information is processed in a fair, open, secure and transparent manner.

Whenever you provide Self management UK with your personal information via our services or via online sites, we will treat that information in accordance with this policy, our terms and conditions of services provided and UK Data Protection legislation.

## 2. ABOUT SELF MANAGEMENT UK

Self management UK is a registered charity (number 1146727).

Self management UK is a "data controller" for the purposes of the Data Protection Act 2018 and (from 25 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. Self management UK is registered with the Information Commissioner's Office (ICO) under reference ZA080062.

For further information about our privacy practices, please contact our Data Protection Officer by:

- Writing to Self management UK, 1a Trident Estate Warrington Road Warrington WA3 6AX
- Calling us on 0333 344 5840
- Emailing to dataprotection@selfmanagementuk.orh

By providing your information to Self management UK either through directly accessing our services or via our website, you are agreeing to be bound by this policy.

This policy may change from time to time, so please check this page periodically.

### 3. HOW WE COLLECT INFORMATION ABOUT YOU

We collect information from you in the following ways:

- When you interact with us directly: This could be if you ask us about our services and activities, register with us for an event or newsletter, make a donation to us, purchase something, apply for a job or volunteering opportunity or otherwise provide us with your personal information. This includes when you phone us, visit our website, use our online contact and referral forms, make a purchase online, or get in touch through the post, or in person.
- When you interact with us through partners or suppliers working on our behalf: This could be if you access a service which is delivered through a trusted organisation working on our behalf and always under our instruction.
- When you interact with us through third parties: This could be if you provide a donation through a third party such as Just Giving or one of the other third parties that we work with and provide your explicit consent for your personal information to be shared with us.

• 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.

• From other information that is available to the public: In order to tailor our communications with you to your background and interests we may collect information about you from publicly available sources.

## 4. INFORMATION WE COLLECT AND WHY WE USE IT

#### **Personal Information**

Personal information we collect includes details such as your name, date of birth, email address, postal address, telephone number and credit/debit card details (if you are making a purchase or donation), 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, registering to attend one of our services or your GP or health care professional has referred you to us to attend one of our services.

We will mainly use this information:

- To process your donations or other payments, to claim Gift Aid on your donations and verify any financial transactions.
- To provide the services or goods that you have requested.
- To update you with important administrative messages about your donation, an event or services or goods you have requested.
- 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.
- To keep a record of your relationship with us.
- Where you volunteer with us, to administer the volunteering arrangement.

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 goods and services you have requested.

We may also use your personal information with your explicit consent:

- To contact you about our work and how you can support Self management UK (see section 8 on 'Marketing' below for further information).
- To invite you to participate in surveys or research.

### Sensitive Personal Information

If you provide us with any Sensitive Personal Information (e.g. about health conditions) 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.

#### A special note about the Sensitive Personal Information we hold

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, offending history, sexual orientation or religious beliefs.

We will only use this information:

- For the purposes of dealing with your enquiry, training, and quality monitoring or evaluating the services we provide.
- We will not pass on your details to anyone else without your express permission 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.
- Where you have given us your express consent or otherwise clearly indicated to us.

### 5. LEGAL BASIS FOR USING YOUR INFORMATION

In most 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 or service obligation with you.

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 Self management UK to process your information to help us to undertake our work.

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.

Some examples of where we have a legitimate interest to process your personal information are where we contact you about our work via post, use your personal information for data analytics, conducting internal research to better understand who our supporters are, improving our services, for our legal purposes (for example, dealing with complaints or claims), or for complying with guidance from the Charity Commission or other regulatory bodies.

### 6. MARKETING

We will only contact you about our work and how you can support Self management UK by phone, email or text message, if you have specifically 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 Self management UK by mail, unless you have told us that you would prefer not to hear from us in that way.

You can update your choices or stop us sending you these communications at any time by contacting <u>hello@selfmanagementuk.org</u> or clicking the unsubscribe link at the bottom of the relevant communication.

### 7. SHARING YOUR INFORMATION

The personal information we collect about you will mainly be used by our staff (and volunteers) at Self management UK so that they can support you.

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.

Self management UK may, however, share your information with our trusted partners and suppliers who work with us on 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.

We enter into contracts with these service providers that require them to comply with Data Protection Laws and ensure that they have appropriate controls in place to secure your information.

#### 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.

### 8. KEEPING YOUR INFORMATION SAFE

Self management UK takes looking after your personal information very seriously. We 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 loss.

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.

Our websites 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. This privacy statement does not cover the information practices of those websites, which should be examined by you independently.

Any debit or credit card details which we receive for goods/services/events are passed securely through our payment processing partners, according to the Payment Card Industry Security Standards. No financial data is retained by self management UK.

## 9. HOW LONG WE HOLD INFORMATION FOR

We only keep your information for as long as is reasonable and necessary for the relevant activity, which may be to fulfil statutory obligations (for example, the collection of Gift Aid).

## **10. LEGISLATION AND STATUTORY REQUIREMENTS**

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 Marketing/Communications team at Self management UK 1a Trident Estate Warrington Road Warrington WA3 6AX; by email at <u>dataprotection@selfmanagementuk.org</u> or by calling us on 0333 344 5840. You can also make a complaint to the data protection supervisory authority, the Information Commissioner's Office <u>https://ico.org.uk/</u>.

- Access to your personal information: 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 and how long we keep it for. You can make a request for access free of charge. Please make all requests for access in writing, and you will need to provide us with evidence of your identity. For more information on Subject Access Requests please see our policy and request form.
- **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.
- **Consent:** If you have given us your consent to use personal information (for example, for marketing), you can withdraw your consent at any time.
- **Rectification:** You can ask us to change or complete any inaccurate or incomplete personal information held about you.
- **Erasure:** You can ask us to delete your personal information 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.
- **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.
- **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.
- 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.

Please note, some of these rights only apply in certain circumstances and we may not be able to fulfil every request.

## 11. COOKIES

<u>'Cookie'</u> 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.

#### 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.

#### 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:

- Strictly necessary cookies are essential for you to move around our website and to use its features;
- Performance cookies collect anonymous information about how you use our site, like which pages are visited most;
- 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;
- Targeting or advertising cookies collect information about your browsing habits in order to make advertising relevant to you and your interests.

#### No cookies, please

You can opt out of all our cookies (except the strictly necessary ones). <u>Find out how to control and delete</u> <u>cookies</u> in your browser.

But, if you choose to refuse all cookies, our website may not function for you as we would like it to.

If you have any questions about how we use cookies, please contact us via one of the options below.

### Monitoring

Your communications with our teams (including by telephone or email) may be monitored and/or recorded for training, quality control and compliance purposes to ensure that we continuously improve our customer service standards.

To find out more about this policy and how we look after your personal information, contact our Marketing/Communications team at hello@selfmanagementuk.org or on 0333 344 5840.