

Interim Privacy Notice

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 sets out how we collect, use and store your personal information (this means any information that identifies or could identify you).

The Aware Privacy Policy may change so please remember to check back from time to time, this is version 1 and was last updated on the 21st June 2018. Where we have made any changes to this Privacy Policy, we will make this clear on our website or contact you about any changes.

We are reviewing our data protection policies across the charity to comply with the new EU General Data Protection Regulations and expect to update this policy further in the coming weeks.

Aware Defeat Depression, trading as AWARE, is the depression charity for Northern Ireland - and the only charity working exclusively for people with depression and bipolar disorder.

We are a charitable organisation (NIC100561) and a company limited by guarantee (NI030447).

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1. Who we are

Here at Aware 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.

We are a "data controller" for the purposes of 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.

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

- Writing to Data Protection Lead, 15 Queen Street Queen Street, Londonderry, Northern Ireland, BT48 7EQ.
- Calling us on 028 9035 7820
- Emailing: info@aware-ni.org

2. How we collect information about you

Everything we do is in pursuit of our purpose of relieving need and improving health amongst those affected by depression and related mental illnesses, as well as their carers.

We want to make sure you receive the communications that are most relevant to you, be it through visiting our website or receiving emails, post or phone calls. We want to make sure you receive the best attention when you book on an event, participate in our programmes or support us through volunteering and fundraising.

We collect information from you in the following ways:

When you interact with us directly: This could be if you ask us about our activities, register or attend training or an event, ask a question about our services, participate in one of our projects/programmes, apply for a job or volunteering opportunity or otherwise provide us with your personal information. This includes when you phone us, visit our website, or get in touch through the post, or in person.

When you visit our website: We don't analyse personal data when you visit our website but if you make an enquiry via our contact pages you will be providing contact information so we can deal with your query. This will only be shared with those who can help in response to that query or comment. If we wish to use your details for other purposes we will seek your consent.

3. Information we collect and why we use it

Personal Information

Personal information we collect may include your name, organisation you work or volunteer for, email address, postal address and telephone number as well as information you provide in any communications between us. You will have given us this information whilst registering for an event, participating in one of our programmes or any of the other ways to interact with us.

We will mainly use this information:

- To provide the services or goods that you have requested.
- To update you with important administrative messages about an event or services or goods you have requested.
- To comply with the grant terms of our funders
- To keep a record of your relationship with us.
- Where you volunteer with us, to administer the volunteering arrangement.

We may also use your personal information:

- To inform you about our work or important news about mental health
- To ask you about supporting us with fundraising or volunteering
- To invite you to participate in surveys or research

Sensitive Personal Information

In the course of our work – we may receive information – particularly through our funded projects about personal experiences of those who have benefited or will benefit from our work. We will have agreements in place or receive explicit consent to further use this 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.

You can of course decide if you want to remain anonymous, if you are happy to share your personal details with staff members or if you would like us to share your story with the media or other parties as part of our work telling people's personal stories about mental health.

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, sex life, sexual orientation or religious beliefs.

If you contact us you may choose to provide details of a sensitive nature.

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 that you are happy for us to share your story, then we may publish it on our blog or in other media.

Photographs

During our events and workshops we may ask to take your photograph, individually or in a group context. In these circumstances we will first ask your permission to do so and provide an opportunity to not be photographed or to remove consent from a photo recently taken. We will at the time explain how the images may be used and if further use is sought beyond this later we will seek your explicit consent.

4. Legal basis for using your information

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, because you are booking on one of our training workshops).

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 us to process your information to help us to achieve our vision.

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 research to better understand who we help, improving our services, for our legal purposes (for example, dealing with complaints and claims), or for complying with guidance from the Charity Commission NI.

5. Marketing & Fundraising

We will only contact you about our work and fundraising by phone, email or 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 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 our data protection lead on info@aware-ni.org or clicking the unsubscribe link at the bottom of the relevant communications.

When you give to us we may ask you to complete a Gift Aid declaration to add 25% extra to the value of what you have given. Information you provide in this way will only be used as required legally by HMRC for the purposes of claiming Gift Aid. If we want to keep in touch beyond this we will ask for your further consent separately.

6. Sharing your Information

The personal information we collect about you will mainly be used by our staff (and volunteers) 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.

When we add personal details to our information systems, or you complete online bookings it is retained on eTapestry software through our provider Blackbaud. They do not have access to the personal records.

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 grant terms and other agreements.

7. Keeping your information safe

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.

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. Please be aware that advertisers or Web sites 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.

8. How long we hold your information for

We only keep it as long as is reasonable and necessary for the relevant activity, which may be to fulfil statutory obligations. We keep personal data in line our data retention policies based on best practice guidelines, to provide you and ourselves with insurance cover and legal protection. We will not keep your information for longer than is necessary.

9. Your rights

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 Data Protection Lead;

You can also make a complaint to the data protection supervisory authority, the Information Commissioner's Office, <https://ico.org.uk/>: [

- **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, 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, and provide us with evidence of your identity.
- **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.

Privacy Notice – Children

We are currently assessing the need for a child specific privacy notice and this will feed into our review of this policy. We will either make a child specific policy available shortly or ensure our policy is written in a way comprehensible to the typical child who is 14 years or older.

To find out more about this policy and how we look after your personal information, contact our data protection lead.