



Privacy Policy

Charities like St Martin's Centre for Health and Healing often have information about people.

- It is the law that all charities and companies must keep this information safe and secure.
- To do this must let people know that they have information about them, and how they will use it.

This document sets out St Martin's Centre for Health and Healing Privacy Policy. It will tell you:

- why St Martin's Centre for Health and Healing needs information about you.
- what St Martin's Centre for Health and Healing does with information about you.
- your rights around how you information is used.

Who we are

St Martin's Centre for Health and Healing is a charity and company.

We are registered with The Information Commissioners Office (ZA3978070)

Here at St Martin's Centre for Health and Healing 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 Data Protection Act 2018 and the EU General Data Protection Regulation 2016 ("Data Protection Law"). This means that we are responsible for the processing of your personal information.

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

- Writing to St Martin's Centre for Health and Healing, Edgbaston Street, Birmingham. B5 5BB
- Calling us on 0121 600 6025
- Emailing to data@smchh.co.uk

How we collect data about you

- Everything we do, we do to ensure that we can help people experiencing a mental health problem receive the support they request. 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 contact us for an initial assessment, book recurring appointments or make a donation.
- 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 for an initial assessment, make a donation to us, purchase counselling, complete a survey providing feedback on our services, 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 interact with us through partners or suppliers working on our behalf: This could be if you access our service through the Living Well Consortium, a school or from the NHS
- 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.
- When you visit our website: We gather general information which might include which pages you visit most often and which services 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 or through third party subscription services or service

providers (we have provided further details about this below – see 'Profiling: Making our work unique to you').

Information we collect and how we use it

Personal Information

The Personal Information we collect includes details such as your name, date of birth, email 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, making a booking on our website or any of the other ways to interact with us.

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, or provide the services you have requested.

We may also use your personal information:

- To contact you about our work and how you can support St Martin's Centre for Health and Healing (see section 8 on 'Marketing' below for further information).
- To invite you to participate in surveys or research.

Sensitive Personal Information

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.

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 (for example, on our blog).

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.

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 explicit 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.

Information about Children and Young People

Where the child is below the age of 16 years, such processing shall be lawful only if and to the extent that consent is given or authorised by the holder of parental responsibility over the child.

Profiling: how we make our work more unique to you

We want to improve how we talk to you and the information we provide through our website, services, and information. To do this we sometimes use profiling and screening methods so that we can better understand our supporters, your preferences and needs to provide a better experience for you.

We may carry out targeted fundraising activities using profiling techniques based on the information that we hold about you. We may also work with third party organisations who provide additional insight, this may include providing wealth screening information or general information about you that is publicly available.

This information can be appended to the information that you have provided which allows us to use our resources more effectively by better understanding the background of our supporters and making appropriate requests based on what may interest them and their capacity to give.

You can of course opt out of this activity at any time. To do this, email 'data@smchh.co.uk with the subject line 'Please stop analysis of my data' or by contacting our Ryan Peters – St Martin's Centre for Health and Healing, Edgbaston Street, Birmingham. B5 5B or by phone on 0121 600 6025

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 have booked counselling sessions on our website website).

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 of ensuring that everyone experiencing a Mental Health problem receives timely counselling and psychotherapy.

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 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.

Cookies

When you first visit our website, we will ask for consent to set any cookies (and to process any personal data collected by these cookies) which are not strictly necessary to make our pages work: you will be able to set your preferences at this stage. Where cookies are strictly necessary, we consider that we have a legitimate interest in processing the personal data they collect.

You can always withdraw your consent by clearing cookies from the cache in your computer and rejecting them next time you visit our site.

We may also use similar technologies to identify when our emails are opened. This allows us to identify whether our marketing campaigns are effective and we consider that we have a legitimate interest in doing so.

For more information about our use of cookies and tags, different types of cookies, the information they collect and further information about how you can control the types of cookies that are placed on your browser, please see [How we use Cookies](#).

Marketing

We will only contact you about our work and how you can support St Martins Centre for Health and Healing by phone, email or text message, if you have agreed for us to contact you in this manner.

If you agree for us to contact you through one of these channels we will send you information about our work and how you can help us to make sure that everyone experiencing a mental health problem receives timely counselling. As well as sharing our latest news, we may contact you about events and fundraising for St Martins Centre for Health and Healing our campaigns and the many ways you can shape our work - or you can choose just the areas that mean the most to you by ticking the boxes when you provide us with your information.

However, if you have provided us with your postal address we may send you information about our work and how you can support St Martins Centre for Health and Healing Mind 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 data@smchh.co.uk or clicking the unsubscribe link at the bottom of the relevant communication. Please

note that when you update your communication preferences it can take up to 28 days to take effect across all of our systems.

Sharing information

The personal information we collect about you will mainly be used by our staff (and volunteers) at St Martins Centre for Health and Healing Mind 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.

St Martins Centre for Health and Healing 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. Some examples of where we may share your information with our partners who help us to process donations and claim Gift Aid and our partners who help us to manage our social media accounts.

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.

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.

Any debit or credit card details which we receive on our website are passed securely to Stripe our payment processing partner, according to the Payment Card Industry Security Standards.

How long do we keep information for

We only keep it 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).

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 contact us at data@smchh.co.uk and by phone on 0121 600 6025. 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, or 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, where one of your rights does not apply, we will communicate the reason to you.

Monitoring

Your communications with our team (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 data@smchh.co.uk or on 0121 600 6025